



Privacy Statement (Members)

Identity and contact details of data controller

Community Housing Cymru (collectively referred to as "CHC" "we", "us" or "our" in this notice) is an umbrella body for housing associations in Wales. As an organisation, we seek to:

- Influence government policy
- Support and promote the work of our members
- Be a voice for the sector

CHC is a registered "data controller" (ZA334456). This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to our current and former members. It aims to give you information on how we collect and process your personal data when you register to be a member, including information you provide through our website (www.chcymru.org.uk).

It is important that you read and retain this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information and what your rights are under data protection legislation.

Our details:

If you have any questions about this privacy notice or how we handle your personal information, please contact us in the following ways:

Postal address: Community Housing Cymru, 2 Ocean Way, Cardiff, CF24 5TG

Telephone number: 02920674800

Email address: privacy@chcymru.org.uk

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

CHC is a registered charity in Wales (1128527).



Personal data we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier, job title, organisation name.
- **Contact Data** includes postal address, email address and telephone numbers.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website.
- **Profile Data** includes your username and password, your interests, your feedback and survey responses, your photograph (if applicable).
- **Usage Data** includes information about how you use our website and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication and language preferences.

If you fail to provide personal data

If you fail to provide personal data when requested, we may not be able to register you as a member or we may have to cancel your registration with us but we will notify you if this is the case at the time.

How we collect personal data

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact, Marketing and Communications Data when you:
 - complete our online form to register as a member;
 - complete a booking form to attend a service we're providing (eg conference, training, webinar etc)
 - create an account on our website;
 - register an account on our conference platform, Hopin;



- contact us by post, phone, email or otherwise;
 - request marketing to be sent to you;
 - subscribe to our publications; or
 - enter a survey or otherwise give us feedback.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy for further details.
 - **Third parties.** We will receive personal data about you from various third parties as set out below:
 - Technical Data from analytics providers such as Google based outside the EU;
 - Technical, Profile and Usage data from website developers and designers such as User Fusion Ltd.
 - Contact, Identity and Technical Data from video conferencing and webinar providers, such as Hopin, Zoom and GoToMeeting.
 - Contact, Identity, Marketing and Communications Data from event management and ticketing providers such as Eventbrite based outside the EU.
 - Profile Data from online survey providers such as SVMK Inc., trading as SurveyMonkey, based outside the EU.

How we use your data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.



We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Activity	Lawful basis for processing including basis of legitimate interest
To register you as a new member, including creating an account on our website for you	Necessary for our legitimate interests (to deliver our services)
To manage our relationship with you, including communicating with you and asking you to take a survey	Necessary for our legitimate interests (to keep our records updated and to study how members use our services)
To administer and protect our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Necessary for our legitimate interests (provision of administration and IT services, network security, to prevent fraud) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you	Necessary for our legitimate interests (to study how members use our services, to develop them, to grow our services and to inform our marketing strategy)
To use data analytics to improve our website, services and marketing	Necessary for our legitimate interests (to keep our website updated and relevant, to develop our services and to inform our marketing strategy)
To make suggestions and recommendations to you about services or training courses that may be of interest to you	Necessary for our legitimate interests (to develop our services)
To consult with you on policies and practices impacting the social housing sector in Wales	Necessary for our legitimate interests (to provide our services)
To register you for our events, including our workshops, webinars, training and conferences	Necessary for our legitimate interests (to provide our services)
To send you our publications where you have requested them	Necessary for our legitimate interests (to provide our services)



Photographs

We will obtain your express consent before we store or share copies of any photographs of you.

Photographs will be stored for up to 5 years.

You have the right to withdraw the consent you have given at any time by contacting us. This will not affect the lawfulness of any processing carried out by us before you withdraw your consent.

Marketing

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and events may be relevant for you.

You will receive marketing communications from us if you have requested information from us or have registered as a member and you have not opted out of receiving that marketing.

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Data sharing

We may share your personal data with the following third-parties for the purposes set out in the table above:

- Esteiro Business Solutions Limited trading as “Goldvision” – a service provider based in the UK who provides system administration services.
- Sabre Computer and IT Services Ltd – a service provider based in the UK who provides IT services/supplies.
- User Fusion Ltd based in the UK who provide website design and development services.
- Eventbrite Inc. based outside the EU who provide event management and ticketing services.
- SVMK Inc., trading as SurveyMonkey, based outside the EU who provides online survey platforms.
- Professional advisers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- The Charity Commission for England and Wales, HM Revenue & Customs, regulators and other authorities based in the UK who require reporting of processing activities in certain circumstances.



We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

International transfers

Some of our third-party processors are based outside the European Economic Area so their processing of your personal data may involve a transfer of data outside the EEA.

Where we engage third parties whose processing of your personal data will involve a transfer of data outside the EEA, we will ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- We may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

Retention period

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

In some circumstances you can ask us to delete your personal data: see below for further details.



Marketing preferences can be altered by you on a regular basis through the unsubscribe link on our communications to you or by contacting us. We also send out a link every year to allow you to amend any contact information.

Individual rights

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it. Please contact us by email at privacy@chcymru.org.uk with the subject title '**Subject Access Request**'. We will require you to provide two pieces of ID to ensure that we are giving the information to the right person. We will respond to your request within one month. There is no charge for a subject access request, but repeated and burdensome requests may incur a charge.
- **Request rectification** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected. Please contact us by email at privacy@chcymru.org.uk with the subject title 'Data Rectification' and we will deal with your enquiry within 10 working days.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. Please contact by email at privacy@chcymru.org.uk with the subject title '**Data deletion**' and we will deal with your enquiry within 10 working days.
- **Request restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it. Please contact us by email at privacy@chcymru.org.uk with the subject title '**Data Processing Restriction**' and we will deal with your enquiry within 10 working days.
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes. Please contact us by email at privacy@chcymru.org.uk with the subject line '**Objection to Processing**' and we will deal with your enquiry within 10 working days.



- **Request the transfer** of your personal information to another party. If you wish to request a transfer, please contact us by email at privacy@chcymru.org.uk with the subject line '**Transfer Request**' and we will deal with your enquiry within 10 working days.