



Privacy Statement (Commercial Members)

Identity and Contact details of Data Controller

Community Housing Cymru (CHC) is an umbrella body of 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

Our details:

Community Housing Cymru
2 Ocean Way, Cardiff, CF24 5TG
www.chcymru.org.uk
02920674810
privacy@chcymru.org.uk

We are Registered Charity (1128527) and a Registered Data Controller (ZA334456).

Data collected and purpose of processing

As an organisation, we will only hold the information that is absolutely necessary to us carrying out our role as a membership body, as well as to contact you about:

- Your individual action plan
- Information from the sector
- Invitations to bi-annual briefings

As such, we will only collect the following information from you:

- Contact Person
- Organisation
- Email
- Address
- Opinions
- Job title
- Membership Packages Details
- Phone Number
- Marketing preferences

We do use data processors, which provide services to us and help us to process your data, including Goldvision (our CRM system) and Sabre Computing (our IT suppliers). We have contracts in place with these processors which means that they will only use your data in ways we have instructed them to do so. They will not share your personal information and will only retain it for as long as we instruct.

As an example, we will often collect your opinions and marketing preferences through SurveyMonkey. Although this organisation is outside the remit of the GDPR, they are signed up to the US Privacy Shield, and are therefore considered as an 'adequate data processors'. After transferring this data to our own private CRM system, any data stored on these systems will be



deleted after a period of up to 3 years. They may collect your IP address and browser information, for analytical purposes.

We will not share your information with any third parties for the purposes of direct marketing, and will only share information where we are legally obliged to.

Legal basis for processing

We hold this information under the Article 6 of the GDPR, for the performance of a contract. However, the collection of your marketing preferences and opinions is gathered on the basis of legitimate interest, as we need this information to ensure we are providing you with the best service possible.

The membership agreement, which stands between us, means that we have to hold this data on you for us to contact you about the service we provide and how we can promote your interests to our members. We will not provide you with the names of our members but will contact them on your behalf if they have expressed a preference to receive information from you.

Recipients or categories of recipients

All staff at Community Housing Cymru are able to access the database of information, which we hold on individual members. However, the computers and laptops, which are used to access it, are password protected. It is also our policy that if a member of staff is found to be misusing data, they will be subject to disciplinary procedures.

We will not pass your data on to any third party, unless we are explicitly asked by you to do so, or in compliance with a legal obligation.

Retention Period or criteria applied

The application form you completed to become a Commercial member will be stored by us in a locked filing cabinet for a period of a year. The membership agreement between us will be renewed at the point at which it is dictated in the agreement. If you choose to not renew your agreement with us, then we will retain the relevant information we have on you for a period of up to 3 years, in case there is a resumption of interest.

Individual rights under GDPR

Under GDPR, every data subject has the following rights:

- **Access** – every data subject is entitled to request any information which is processed by our organisation. Please contact 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.



- **Rectification** – you, as the data subject, have the right to have any inaccurate data held on you updated without delay. Please contact privacy@chcymru.org.uk with the subject title 'Data Rectification' and we will deal with your enquiry within 10 working days.
- **Erasure** –if you request for us to delete your information, we will do so. However, if you are the contact person for the organisation, we will not then be able to exercise our agreement with you and you will have to nominate another point of contact. Please contact privacy@chcymru.org.uk with the subject title '**Data deletion**' and we will deal with your enquiry within 10 working days.
- **Restriction of processing** – you are entitled to restrict what we use your data for. If, at any time, you no longer wish to receive a particular category of information from us then please let us know so we are able to restrict what we contact you about. Please contact 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** – you have the right to object to our processing of your data at any point. If you no longer wish for us to hold data on you, then please contact privacy@chcymru.org.uk with the Subject line '**Objection to Processing**' and we will deal with your enquiry within 10 working days.