PRIVACY NOTICE

In this document the expression ‘we’ refers to, ClwydAlyn Housing Limited, Tir Tai Limited, PenArian Limited and Tai Elwy Limited, that provide housing and related services across North Wales.

Each entity is the controller of its own personal data although data may be processed by other Group members on its behalf.

This privacy notice sets out how we collect and use information about you.

Read about our use of cookies at **https://www.clwydalyn.co.uk/cookie-notice/**

ClwydAlyn are signatories to the Welsh Accord on the Sharing of Personal Information (WASPI) you can visit their website **www.waspi.gov.wales** .

Please read this privacy notice carefully to understand how we will use your personal information. If you have any questions or queries in relation to this privacy notice, you can contact our Data Protection Officer at:

E-mail/online	**datacontroller@clwydalyn.co.uk**
Postal address	72 Ffordd William Morgan St Asaph Business Park St Asaph Denbighshire LL17 0JD
Customer Services	Monday to Friday 08:00 to 17:00 Freephone from a landline **0800 183 5757** or **01745 536800**

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1 What information we may collect about you

The following links cover how we collect information about you in the following ways:

- **If you call our Contact Centre**
- **If you e-mail us**
- **If you make a complaint to us**
- **If you use our services**
- **When you visit our website**
- **When we receive Information from others**
- **If you visit our premises**
- **If you make a job application**
- **If you are an employee**
- **Board, Committee and Panels**
- **Equality, Diversity and Inclusion**

The information we collect about you depends on why you are dealing with us. For example, if you make a housing application or become a Contract holder (Tenant), we will need more information from you than if you are making a simple enquiry.

1.1 If you call our Contact Centre

When you call our contact centre, we collect Calling Line Identification (CLI) information. We use this information to help improve our efficiency and effectiveness.

We record calls for training and monitoring purposes. Additionally, our call handlers make a record of your call to manage your query. We may need to share information with other organisations to properly respond to your call, for example so that we can organise maintenance or repairs or other support. We will usually tell you if it is necessary for us to pass information on to other organisations.

If you call outside of our normal business hours your call may be handled by a third-party contact centre service or passed to a third-party emergency cover service.

1.2 If you email us

Any email sent to us, including any attachments, may be monitored and used by us for reasons of security and for monitoring compliance with policy. Email monitoring or blocking software may also be used. Please be aware that you have a responsibility to ensure that any email you send to us is within the bounds of the law.

1.3 If you make a complaint to us

When we receive a complaint, we create a record containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide. If a complainant doesn't want to be identified to any person that the complaint is about, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

1.4 If you use our services

We hold the details of the people who request and use our services so that we can provide these services and for other closely related purposes. For example, we use information about our service users to develop and improve our services and to make sure we are delivering services to different groups fairly.

If you apply for housing or become a Contract holder (Tenant), there is certain information that we require to process your application and manage your tenancy. If you do not provide us with this information, we will not be able to progress your application.

Some residents may move into properties that contain energy monitoring equipment that collects data for Welsh Government to help them in becoming carbon neutral. The way data protection law works means that some information about your home and your energy usage could, in some circumstances, include personal data. You have the right to opt out of this service.

You can read the Welsh Government statement by clicking the link below:

https://businesswales.gov.wales/privacy-notice-index-digital/business-wales-operational-privacy-statement

1.5 When you visit our website

We automatically collect certain information when you visit our website. Please see our Cookie Policy above for more information about this.

When you use our customer portal you view information held in our housing management system including personal details, account statements, tenancy information, repair history and your rent and service charges. Please note that we use a third-party provider to support our customer portal.

1.6 Information we receive from others

We work closely with other organisations, such as government departments, local councils, police forces, voluntary sector organisations, other housing providers and our contractors, and we may receive information about you from them.

1.7 If you visit our premises

We may ask you to sign in and out if you visit staff or residents at our premises. Access is controlled for the purposes of building and occupant security and is recorded to assist with fire and other evacuation procedures. Furthermore, your image may be captured on CCTV to monitor and collect visual images for the purpose of security and the prevention and detection of crime. In certain specific circumstances we reserve the right to monitor events on CCTV.

If you use our Wi-Fi or computer to access our IT systems, access and activity may be monitored to prevent misuse of our property, according to our policies.

1.8 Job applicants

When you apply to work for us, we will only use the information you supply to us to process your application and to monitor recruitment statistics.

Personal information about unsuccessful candidates will be held for 12 months after the recruitment exercise has been completed; it will then be destroyed or deleted. We retain de-personalised statistical information about applicants to help inform our recruitment activities, but no individuals are identifiable from that data.

1.9 If you are an Employee

We have a People Management system to keep employee information. This is kept secure and will only be used for purposes directly relevant to each person's employment. Once employment with us has ended we retain the file in accordance with the requirements of our retention schedule and then delete it.

The personal information about you which we expect to collect, hold and use ('process') is likely to include the following. This list is not exhaustive but is intended to give you a clear idea of the personal information about you which we process:

- Contact names, address, date of birth, personal telephone numbers and personal email addresses for you and your emergency contacts.
- Information gathered during your recruitment process (including references, right to work checks and unspent or spent convictions and criminal records checks where applicable).

- Details of the terms of your employment or appointment (including pension and other benefits).
- Payroll, tax and national insurance information, your bank account details and information about expense claims.
- Details of your job title/job role and related duties, management, and the organisation of work.
- Information about your performance including appraisals, pay rises, promotions and complaints (whether made by you or about you).
- Time, attendance, absence records including holiday records, self-certification forms, medical certificates and health records
- Details of leave for family or personal reasons (e.g. maternity, paternity, shared parental or adoption leave).
- Details of any disciplinary investigations, grievance investigations or complaints, whether or not any disciplinary action was taken.
- Records of your education, training, qualifications and achievements.
- Health and safety incidents.
- Monitoring of EDI (including, for example, age, race/ethnicity, religion, whether you have a disability, sexual orientation, gender identity and marital status).
- Information on your membership of, or being a representative of, a trade union.
- Access you may have to our property or a customer's property.
- Your photograph for company ID procedures.
- Your inclusion in photographs, recordings or filming of meetings, events or other activities (based upon you granting consent).
- Digital data including building access (such as swipe cards or CCTV footage) and your use of our telephone and IT systems including laptops, computers, tablets, smartphones, and other devices provided by us (in some circumstances this may include us monitoring those systems).
- Communications with your manager(s), others working with you and with the People Department: for example, if you make a flexible working request.

- To comply with legal obligations such as Health and Safety laws, your wellbeing and welfare or safeguarding vulnerable people, which may include us working with approved specialist third party providers.

1.10 Board, Committee or Panels

If you are a member of one of our Boards, Committees or Panels, we ask for personal details for managing and statistical purposes, including a declaration of interests.

1.11 Equality, Diversity and Inclusion (EDI)

We are dedicated to becoming fully inclusive, where differences are celebrated and our staff and service users feel supported and valued. Collection of EDI data can help us to continue this journey of inclusivity.

We use EDI data to comply with the data submission requirements from Welsh/UK Government and complete gender, disability and ethnicity pay gap reviews in line with legislation. We collect language preferences in line with legislation (particularly Welsh Language Standards), including using this information to identify our Welsh speaking staff. Anonymised EDI data and reports are shared with the Government for their use when they request it.

As an organisation, we closely monitor and analyse EDI data confidentially to ensure that our processes are fair, transparent and promote equity of opportunity for all staff and service users. We use this data to help ensure everyone can access the support they require and that the services we offer make a meaningful difference.

Any missed or unanswered responses on EDI forms are recorded as ‘prefer not to say’ and the remainder of the form is recorded as normal.

2 How we use your information if you are a Contract holder (Tenant)

We process your personal information primarily in connection with managing our housing services. If you are a Contract holder (Tenant), this includes managing your tenancy and dealing with any applications, queries or complaints that you make. If you are an employee this includes managing your employment.

Examples of how we use your information include:

- to confirm your identity
- to assess your suitability to access any of our services
- to manage your tenancy, care or support

- to ensure our properties are appropriately maintained and in accordance with legal obligations, such as periodic gas safety checks
- to notify you about important changes to our services
- to let you know about other relevant services, both ours and those of other parties whose products and services we have agreed should be made available to you (see the section below on 'Contacting you' for more information)
- to update and correct our records
- to carry out statistical and market analyses including benchmarking exercises, to enable us to understand you better and improve our services and in accordance with our operating regulations
- to develop, test and improve our systems
- to ensure the content of our website is presented in the most effective manner for you and for your computer
- to administer our website and for internal operations including troubleshooting, data analysis, testing, research, statistical and survey purposes
- to comply with other legal obligations such as Health and Safety laws or safeguarding vulnerable people

We may combine information we receive from other sources with information you give to us for the purposes set out above.

3 Contacting you

We will use your contact information to send you important information via letters, emails, text messages, or to telephone you, depending upon any preference that you have expressed. We are required to provide certain information to you by letter. We may record telephone calls for security and training purposes.

We may use the information we hold about you to provide you with information about our services which we feel may interest you.

You can opt out of receiving marketing communications at any time, although please note that we will continue to send you important messages about your tenancy or employment.

If you have changed your mind about being contacted for marketing purposes, please contact our Customer Services Team on **0800 1835757** (freephone from a

landline) or **01745 536800** to update your preferences. Or e-mail us at help@clwydalyn.co.uk.

4 MyClwydAlyn Portal

MyClwydAlyn is a self-service portal for Contract holders (tenants) where preferences and personal details can be updated. You can register here **https://www.myclwydalyn.co.uk/**

5 Sharing your information

We do not sell your information to any third party, but in certain limited circumstances we may disclose your personal information to:

- any part of ClwydAlyn, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 736 of the UK Companies Act 1985; and/or other third parties in the following circumstances
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation
- to enforce or apply our terms and conditions and other agreements
- to protect the rights, property, or safety of ClwydAlyn, our customers, employees or others
- to investigate or prevent a crime. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction
- to enable us to perform our legitimate interests as a provider of housing and associated services (for example, to undertake satisfaction surveys) or to fulfil our role as an employer
- to obtain any professional advice; and/or
- with your consent.

6 Our legal basis for collecting, holding and using your information

Data protection law sets out various lawful legal bases (or 'conditions') which allow us to collect, hold and use your personal information:

Where you have a contract with us, we may need to use your information to provide you with our services. An example of this is where you have a tenancy with us.

Where we are under a legal obligation which requires us to process your personal information. For example, notifications of Health and Safety incidents.

We will sometimes use your personal information based upon your consent. We will always tell you where this is the case and ask you to agree before we process your information. An example of using your personal information with your consent is publishing your image as part of a photograph on our website.

Finally, sometimes it is necessary to process your personal information for the purposes of our own legitimate interests. We will only do so where these interests are not overridden by the interests and fundamental rights or the freedoms of the individuals concerned. An example of this is when we may contact you to ask about your experience of contacting our Customer Services Team or a recent repair to your property. We are compelled to work within the Renting Homes Act which you can learn about here: https://www.gov.wales/housing-law-changed-renting-homes

Data protection law recognises certain "special categories" of personal information, which is information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic information, biometric information for uniquely identifying a person, information concerning health, and information concerning a person's sex life or sexual orientation. Information about criminal offences and records is placed in a similar category.

These special categories of personal information are considered particularly sensitive and we will only collect and use this information where you have given us your explicit consent or where we consider it necessary to do so.

7 Security and storage of your personal information

The information we collect about you may be transferred to, and stored at, a destination outside the European Economic Area (EEA). It may also be processed by staff operating outside the EEA who work for one of our suppliers.

We take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

We keep personal information about you no longer than necessary and in keeping with our Retention Schedule.

8 Your rights

You have the right to request access to your own personal information from us. This is known as a 'subject access request'.

You also have the right to ask us not to process your personal data for direct marketing purposes. We will tell you if we intend to use your data for this purpose or if we intend to disclose your information to any third party for this purpose. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data or by contacting our Customer Services Team on **0800 1835757** (freephone from a landline) or **01745 536800**.

Under UK GDPR you have additional rights to request from us:

- That any inaccurate information we hold about you is corrected
- That your information is deleted
- That we stop using your personal information for certain purposes
- That your information is provided to you in a portable format
- That decisions about you are not made by wholly automated means
- Many of the rights listed above are limited to certain defined circumstances and we may not be able to comply with your request. We will tell you if this is the case.
- If you choose to make a request to us, we will aim to respond to you within one month. We will not charge a fee for dealing with your request.

9 Smart Doorbells and CCTV installed by Tenants

The use of CCTV in a private domestic dwelling in Wales is regulated by the Protection of Freedoms Act 2012 which aims to balance people's right to protect their property with others' right to privacy. The capturing of images outside your own property is subject to the Data Protection Act 2018 and the UK General Data Protection Regulation (GDPR).

The installation of CCTV has been the subject of many disputes between neighbours and complaints to the police and Information Commission (ICO) by people who believe the cameras are being used to spy on them and their families.

Remember that you are responsible for what happens to the information captured by your cameras; keep all recordings secure and keep access to them to a minimum. If you collect footage that may be used to identify potential offenders, you should only share this with the police or other relevant law enforcement body. It is strongly advised not to share images or recordings with ClwydAlyn or to publish them on social media sites without police permission as doing so could jeopardise a police investigation. If you share footage with ClwydAlyn we may pass the recording to the police or other authorities where appropriate without your

further consent and where appropriate, we may disclose where the original footage came from.

10 The Data (Use and Access) Act 2025 (DUAA)

The Data (Use and Access) Act amends the UK GDPR and the Data Protection Act 2018. Where relevant, we apply these changes when processing personal data, for example when verifying identity or sharing data with trusted partners. This does not reduce your data protection rights, which continue to be protected under UK data protection law.

11 Complaints regarding Personal Data

In keeping with DUAA, you can address complaints or concerns regarding how we collect or use your **personal data** to our Data Protection Officer as below and we will try to resolve any issues you may have.

E-mail/online	**datacontroller@clwydalyn.co.uk**
Postal address	72 Ffordd William Morgan St Asaph Business Park St Asaph Denbighshire LL17 0JD
Customer Services	Monday to Friday 08:00 to 17:00 Freephone from a landline **0800 183 5757** or **01745 536800**

You can learn how ClwydAlyn will handle your data protection complaint and you may wish to use our dedicated complaints form via the ClwydAlyn Website using the link **https://www.clwydalyn.co.uk/compliments-complaints/** "**Make a Data Protection Complaint**"

You also have the right to complain to the UK statutory regulator for data protection law, the Information Commission (ICO) at https://ico.org.uk/concerns/ or telephone **0303 123 1113.**

12 General Complaints

Compliments, concerns and complaints that do not directly concern your personal data should continue to be addressed to our Complaints Team at **https://www.clwydalyn.co.uk/compliments-complaints/**. ClwydAlyn's Complaints Policy is available on our website under external publications **Complaints Policy GOV-POL-19.pdf**

13 Social Tenant Access to Information Requirements (STAIRs)

STAIRs is a UK government transparency standard enabling social housing tenants in England to access management information from their landlord. As a Welsh

organisation ClwydAlyn are not subject to STAIRs but we acknowledge that it aims to provide positive additional rights to information to tenants of social landlords. You can find information that equates to the rights granted to tenants by STAIRs on our website and by accessing your login to our Tenant Portal.

Read about our use of cookies at https://www.clwydalyn.co.uk/cookie-policy/

14 The use of Artificial Intelligence (AI)

Any processing of your personal data using AI Tools is undertaken to improve the efficiency, quality, and speed of processes that are already happening manually. Using AI to automate these processes allows ClwydAlyn resources to be used where they are needed most.

Personal data may be contained within documents uploaded to our AI tools. We are the data controller of your personal data when it is used, and the AI provider is a data processor, with whom we have a signed agreement in place to ensure that your personal data is protected. Users of our AI tools have been trained in their practical and ethical use and process personal data in accordance with UK GDPR and ClwydAlyn policies.

Any supplier who has access to your data is assessed for compliance with Data Protection legislation before any information is processed by them and none of your personal data is used solely by the AI technology provider to improve their AI products.

We do not use AI to make automated decisions. There is always a human intervention to review and approve any outputs from the AI tools. Decisions are not made solely by automated means.

We strongly advise that you too, do not upload information into any online AI tools without considering the implications of providing your potentially sensitive personal data to AI that may not prioritise your protection or wellbeing.