

Privacy

Introduction

Alpha Living is strongly committed to protecting personal data. This Privacy Notice explains the following:

- Who we are.
- What information we collect.
- How we collect your information, why we need it and how we use it.
- What legal basis we have for processing your personal data.
- When do we share personal data.
- Where do we store and process personal data.
- How we secure personal data.
- How long we keep personal data for.
- Your rights in relation to personal data including your rights to withdraw consent.
- The use of automated decision making and profiling.
- How to contact us including how to make a complaint with a supervisory authority.
- The use of cookies and other technology.
- Links to other websites and third-party contact.
- How and when we review our privacy notice.

We recommend you read this privacy notice thoroughly. Please contact us with any questions or concerns regarding our privacy practices. Our contact details are on our website and also contained within this Privacy Notice.

Who we are

Alpha Living is a charitable Community Benefit Society (Mutuals Public Register no 16317R) and a Registered Social Landlord (no L1033). We act as both a Data Controller and Data Processor in the following circumstances:

- Data Controller - data collected to enable us to conduct normal business as Alpha Living.
- Data Processor - data collected in order to fulfil our role.

You can contact us either by telephone on 0330 460 9870 or via e mail on enquiries@alpha-living.co.uk

What Information do we collect?

When we talk about personal data or personal information, we are only referring to information from which an individual person can be identified. It does not include data where the identity has been removed.

Data collected includes the following categories of information:

- Identity data which includes your name, date of birth, passport number, photo driving licence number, business interests and gender
- Financial data including billing address, account details, bank account holder details and bank card details.
- Contact data (e mail address, telephone number)
- Marketing and Communications data - preferences for receiving marketing.
- Special categories of data may include:
 1. Racial or Ethnic origin supplied voluntarily during the recruitment or tenancy sign up or other tenancy or staff management processes
 2. Declaration of offences during the recruitment or tenancy sign up processes under the Rehabilitation of Offenders Act as part of our duty to follow HM Government's Baseline Personnel Security Standards (BPSS)
 3. Region and residency, social mobility, age and sex, gender re-assignment and sexual orientation, disability, caring responsibilities, race, religion/belief.

To put this into context, it includes personal information collected as a result of:

- If you contact us
- If you attend an event organised by us either externally or at our venue

- If you are a stakeholder or a member of a special interest group
- If you apply for a job with us
- If you apply for a tenancy with us
- If you supply goods or services to us
- If you book an event or meeting
- If you have entered into an agreement to utilise office space
- All forms of communication with us, including e-mail, social media, verbal and telephone communication
- If we provide services to you

How we collect your information, why we need it and how we use it

When you contact us regarding the work we do, we will handle your data with the utmost care and are sensitive to the need to handle all data lawfully, fairly and transparently.

The methodology of collection varies but includes and is not exclusive to:

- Information gathered from e-mail or written contact;
- Information gathered from telephone contact;
- Information gathered via the completion of an online form on our website, or via a third-party platform e.g. Eventbrite.
- Information gathered verbally or in writing at or in relation to events held by ourselves or others; and
- Information gathered in support of special interest groups, programmes and projects.
- Information gathered via social media.

- Information supplied by third parties or publicly available sources, e.g. Companies House, Credit Safe as part of our due diligence checks.

You should also be aware of our responsibilities under Freedom of Information legislation, our remit to provide information to meet internal and external audit requirements and our legal obligations (e.g. fraud prevention).

Use of Automated decision making and Profiling

As part of its day to day business activity, Alpha Living may utilise computer automated decision making and profiling to meet its legal obligations. This includes such checks that are required by the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (“New Regulations”). Consent will always be obtained from you prior to these checks being conducted.

We do not conduct marketing profiling.

Use of Cookies and other technologies

This Notice lays out how and why we use cookies on the website and offers resources that will allow you to make an informed decision regarding the acceptance, rejection or deletion of any cookies that we use.

By using our website, you consent to our use of cookies, so we recommend that you read through the information below. This cookies policy may change at any time, so please check it regularly.

A cookie is a small file of letters and numbers which often includes an anonymised, unique identifier. This means that it can be used to identify you without revealing

your personal information. When you visit a website, it asks permission to store a cookie in the cookies section of your hard drive. Cookies are widely used on the internet to make websites work, to make them work more efficiently, or to provide information about your usage of the site to the site owner or other third parties. For example, if you add items to a shopping basket, a cookie allows the website to remember what items you're buying, or if you log in to a website, a cookie may recognise you later on so that you do not have to put in your password again.

How do we use cookies?

We use cookies to improve the way our website works. We also use third-party cookies set by Google Analytics to review our site functionality,

Third-party cookies

A third-party cookie is one that is associated with a different domain or website than the one that you visit. For example, on this site, we use third-party cookies built by Google to enable website analytics, but as our site is not on the Google domain, this makes their cookies “third-party” cookies. The Google Analytics cookie will recognise and count the number of people who visit our site, as well as providing other information such as how long visitors stay, where they move to on our site, and what pages receive the most visits. We cannot directly control how Google cookies behave.

What legal basis we have for processing your personal data

We always have a legal basis for processing personal data, the legal basis we use are as follows:

- Where processing is necessary for the performance of a contract to which the data subject is party; or

- Where the data subject has given consent to the processing of his or her personal data for one or more specific purposes; or
- Where processing is necessary for compliance with a legal obligation to which we are subject; or
- Where processing is necessary in order to protect the vital interests of the data subject or of another natural person; or
- Where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us (the controller); or
- Where processing is necessary for the purposes of legitimate interests pursued by us or a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data

To put the use of the six legal bases we use for processing personal data into context we will use the personal data and information we collect for the following purposes:

- To reply to any enquiry, you make and to provide you with information regarding the services we provide
- To deliver on any of our programmes and other services we offer
- To make a payment to you including a transfer of funds on completion of a transaction on which you have provided services to us.
- To manage our relationship with you
- To comply with our legal and regulatory obligations
- To undertake credit checks and any checks we deem necessary to confirm your identity.
- To deal with any client feedback or complaint you may make.
- To administer, develop and improve our business.
- To protect our business e.g. should it be necessary to commence debt recovery actions or defend any legal claim.

- To make suggestions and recommendations to you about the services we undertake and which may be of interest to you.
- To invite you to any hospitality or networking events (physically and online) we may hold or of which we may be a party and which may be of interest to you.

We must have a lawful reason for processing your personal information. Most commonly, we will use your personal information in the following circumstances:

- Where we need to deliver the programme or perform the contract for services we are about to enter into or have entered in to 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 or regulatory obligation
- Where you have given your consent to process your personal information

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. Information is only held for as long as there is a legitimate reason to do so, information that is no longer required is destroyed in such a way that it cannot be reconstructed. If you wish to obtain an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

When do we share personal data?

Disclosure of Information for legal or regulatory purposes

We may need to disclose your information to a third party as part of ongoing programme management and audit requirements.

Additionally, as part of our remit to conduct due diligence we may also need to release information to progress governance checks for specific requirements,

programmes, other parties (or projects. We will carry out this process lawfully, proportionately and securely).

Third parties include:

- External advisors and consultants directly engaged with programme/project delivery (please note that all advisors/consultants are bound by confidentiality requirements in their contracts);
- Organisations with which we have a shared financial relationship (e.g the housing benefit departments of local authorities);
- Organisations who provide funding and/or support for innovation
- Our professional advisers e.g. lawyers, bankers, accountants
- Third party service providers who provide administrative and support services to us
- HMRC
- The Regulator of Social Housing

We will ensure that if information is required to be shared, then it will be shared securely, and you will be informed that we have shared it, who we have shared it with and how we shared it.

Where do we store and process personal data?

Alpha Living data may be stored within Microsoft 365, a Customer Relationship Management (CRM) system, a HR system and project management software.

We undertake regular security reviews of all our third party platforms and conduct risk assessments as required under Article 35 of the EU GDPR and Chapter 2 of the Data Protection Act 2018 (UK GDPR) to comply with our duty as a Data Controller. The systems identified are third party systems which have not been created by or owned us and are outside our control with their own privacy

policies. Please contact our Data Protection Officer for further information should you wish to understand how your data is processed by the relevant platform.

How do we secure personal data?

We have in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised manner or otherwise used or disclosed.

To achieve this, we use encrypted secure technology to protect all personal information stored by us. We operate up to date and regularly review policies for Data Protection, Password Policy, Information Security and Business Continuity (including Risk Assessments via the DPIA process and individual risk assessments) to support our business processes and to ensure that all personnel are aware of the importance of data security.

Access to information is permitted on a need-to-know basis.

How long do we keep your personal data for?

We only keep and process personal data for as long as there is a contractual or business requirement to do so or we are otherwise obliged to keep the same under any contractual, regulatory or legal requirement. Once the requirement has expired, the information is deleted safely and securely from our systems in such a way that Information which is deleted is done so in accordance with current security regulations.

Keeping us up to date

As part of our responsibility to ensure that information we hold about you is up to date, we rely on you to keep us updated. We request that where any of your details change, that you inform us so that we may update our records accordingly.

Your legal rights in relation to personal data including your rights to withdraw consent.

As a data subject, you have rights in relation to your Personal data. These are:

- You have a right to access your personal information,
- You have a right for incorrect information held about you to be rectified
- You have a right for information which you no longer wish us to hold to be erased (also known as the right to be forgotten)
- You have a right for the processing of your information to be restricted
- You have a right to data portability - for your personal information to be transported in a structured, commonly used, recognisable format
- You have a right to object to the processing of your personal information,
- You have a right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or significantly affects you.

You also have the right to make a Subject Access Request. As part of this process you will be able to ascertain:

- Whether or not your data is processed, and if so why
- The categories of personal data concerned
- The source of the data if you have not provided the original data

- To whom your data may be disclosed, including outside the EEA and the safeguards that apply to such transfers.

We reserve the right to validate your identity prior to release of information. We will not make any charges for such requests, unless the requests are made repeatedly and are considered excessive. We will respond to your request within 28 days.

We provide a form for you to fill in which we use to ensure that your rights are addressed in full.

If you have provided consent to us to process any of your data, then you also have a right to withdraw that consent unless we are contractually or legally obligated to retain data. Withdrawal of consent will also result in withdrawal of support from the service or programme(s) to which you are signed up to. In cases where we do not need to retain data for contractual, legal or regulatory reasons, we will delete the data as soon as possible and at the very least within 28 days.

Links to other websites and third party contact

Alpha Living does link to external sites and resources as part of our normal business activity. This includes news stories and links to other websites as part of the information being shared on our website. Use of those links may allow third parties to collect or share your personal information. As we have no control over how such third parties may collect and share your information we do not take any responsibility for their use of your information.

How to contact us, including how to make a complaint with a supervisory authority.

You can contact Alpha Living via a number of different routes. We will deal with your enquiry in the same way regardless of how you choose to contact us. For further information on how we process your data, please contact us in writing at:

Alpha Living, Management Office, Poppyfields, Woodpecker Close, Upton, Wirral, CH49 4AA

or via e-mail to enquiries@alpha-living.co.uk

If you are unhappy with the way in which your personal data has been processed and wish to raise a complaint, please do so by one of the methods described above. We will handle your complaint sensitively, and confidentially and will write to you with a response within 10 working days.

If you are dissatisfied, you have the right to communicate directly to the Information Commissioner (ICO). The Information Commissioner can be contacted at:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

www.ico.org.uk

We would appreciate if you would let us try and resolve the matter first before referring it to the ICO.

Review of the Privacy Notice

We regularly review all of our policies and procedures, we will post updates on our documentation and webpage, this Privacy Notice was last reviewed and amended in March 2024.