

# Homes England's Privacy Notice

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Homes England (the trading name adopted by the Homes and Communities Agency) is committed to protecting the privacy and security of your personal data.

This privacy notice aims to give you information on how Homes England collects and processes the personal data provided to us, including information that you provide directly, and tell you about your rights and how the law protects you.

Homes England's websites are not intended for use by children and we do not knowingly collect personal data that could identify individual children.

Please use the **Glossary** to help you understand the meaning of some of the terms used in this privacy notice.

## Our specific processing notices

For ease of use, this privacy notice is provided in a layered format. Please refer to the sections of this notice that are relevant to you. Alternatively you can download a full pdf version of the notice [here](#).

- [Users of our websites and web portals, including suppliers of goods, services and works](#)
- [Help to Buy](#)
- [Contractors and agency workers](#)
- [Information Governance and enquiries \(making a Freedom of Information Request, exercising Data Subject Rights, making a complaint or making a general enquiry\)](#)
- [Applicants for employment](#)
- [Former employees](#)
- [Home Building Fund and Affordable Housing Programmes \(and legacy programmes\)](#)
- [Visitors to our buildings/sites/premises](#)

It is important that you read this privacy notice together with the specific section of the notice that governs the processing activity that is relevant to you, in addition to any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

## How we keep your personal data secure

Homes England takes the security of all the data we hold very seriously. We adhere to internationally recognised security standards. Our Information Security Management System (ISMS), utilises ISO/IEC27001:2013 as a framework and the Plan-Do-Check-Act (PDCA) model is adopted.

We have policies, procedures and training in place covering data protection, confidentiality and security and regularly review the appropriateness of the measures we have in place to keep the data we hold secure.

## Disclosures of your personal data

We may share your personal data with **Third Parties** including **Third-Party** service providers, regulatory bodies, the Police and other Government departments and agencies. Where we do so, we will require all **Third Parties** to respect the security of your personal data and to treat it in accordance with the law.

We or our **Third Parties** may transfer your personal data outside the EU. Where we do so, we have put in place measures to ensure your personal information is provided with adequate protection in accordance with data protection legislation.

For more information about the purposes for which we may share your data with **Third Parties**, please refer to the relevant section of this privacy notice that governs each specific processing activity.

## Retention

Homes England will only retain your personal data for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, regulatory accounting, or reporting requirements.

### [Read more](#)

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal or regulatory requirements.

By law we have to keep basic information about our customers and suppliers for tax and VAT purposes for a certain period after the last transaction.

In some circumstances you can ask us to delete your data: see the Data Rights section for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## Our role as Data Controller

The Homes and Communities Agency, trading as Homes England, is a “data controller” for the purposes of the General Data Protection Regulation (GDPR) and the Data Protection Act 1998 (as updated, amended and re-enacted from time to time). This means that we are responsible for deciding how we hold and use your personal data.

## Data Protection Officer

The contact details for our data protection officer are as follows:

**By post:** For the attention of the Data Protection Officer, Homes England, Windsor House, 50 Victoria Street, London, SW1H 0TL

**By email:** [DPO@homesengland.gov.uk](mailto:DPO@homesengland.gov.uk)

**By phone:** 0300 1234 500

## Data Rights

Under the data protection legislation, with effect from 25 May 2018, you have certain rights with regard to your personal data. Homes England must respond to a request to exercise these rights within one month. If you would like to request details of the personal data we hold about you, please contact the Data Protection Officer.

### Read more

Under certain circumstances and with effect from 25 May 2018, by law you have the following rights in regard to your personal data:

- **Right to be informed** – you have the right to request details of how your personal data is processed. This privacy notice is a proactive document designed to meet this right.
- **Right to request access** – you can request copies of the personal data we hold about you. This is commonly known as a “subject access request” or SAR. The purpose of this request is to establish the accuracy of the personal data we hold and to check we are processing it lawfully.
- **Right to request correction or rectification** – if you think that some or all of the personal data we hold on you is incorrect or incomplete, you can ask for it to be corrected.
- **Right to request erasure** – you have the right to ask us to delete your personal data if you think that we do not have a legal reason to continue to process it.
- **Right to request suspension of processing** – this enables you to request we suspend processing your personal data; for example while we establish the accuracy of the data.
- **Right to object** – you have the right to object to the processing of your personal data for direct marketing purposes.
- **Right to request data portability** – you can request that your personal data is transferred to a third party directly in a readable format.

In the limited circumstances where you may have been asked for, and provided, your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Data Protection Officer. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another lawful basis for doing so.

## Complaints

If you are unhappy with how any aspect of this privacy notice, or how your personal information is being processed, please contact the Data Protection Officer.

If you are still not happy, you have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)).

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Tel: 0303 123 1113

Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

<https://ico.org.uk/global/contact-us/>

## Glossary

### LAWFUL BASIS

**Public Interest** A data controller may process personal data without consent where necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### SPECIAL CATEGORIES OF PERSONAL DATA

Personal data revealing race or ethnicity, political opinions, religion or beliefs, trade union membership, health or sex life, sexual orientation, genetic data or biometric data.

### THIRD PARTIES

- Service providers who provide IT and system administration services to Homes England. In particular, Homes England's e-tendering tool (ProContract) is hosted by ProActis (Due North). If you register to use the e-tendering system, you will be required to agree to the ProActis Terms and Conditions of using the system, and also their privacy notice.
- Professional advisers including lawyers, bankers, auditors and insurers based who provide consultancy, banking, legal, insurance and accounting services.
- Ministry for Housing, Communities and Local Government who are the sponsor body for Homes England and commissions Homes England to administer and deliver Government programmes
- HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances, including those involved in the prevention or

detection of fraud and money laundering.

- The Police
- HM Treasury and National Audit Office
- Credit reference, CDD providers and rating agencies who may help us decide whether to provide you with a product or a service
- Third parties to whom we may choose to outsource, sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

# Users of our website and web portals

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This section of our privacy notice applies to all individuals who visit our websites or provide information to us via one of our web portals.

It is important that you read this section of our privacy notice together with the main section of our [privacy notice](#), or any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you. This is so that you are fully aware of how and why we are using your data.

## Gov.uk and third party links

Please note that our Gov.uk web address is provided to us by the Government Digital Service (GDS). Please ensure that when visiting this website that you read the [GDS privacy notice](#) to understand how this may affect your personal data.

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 notice of every website you visit.

## Information we collect

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, data such as:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, nationality and gender.
- **Contact Data** includes billing address, residential address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details and information about the financial status of you or your business, including ownership structures and shareholdings etc.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **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 this website.

- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Procurement Data** includes information that we may need to obtain and consider to ascertain in connection with UK and EU public procurement legislation (eg whether grounds for exclusion under the Public Contracts Regulations 2015 may apply)
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

### [Read more](#)

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data is data that may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not request any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). However, we recognise that where you are applying for a service or product, or tendering to provide goods, services or works, you may choose to provide us with information that falls within the definition of Special Categories of Personal Data. For example, when you are using our Property Consents web portal to apply for our consent to make alternations to a property, you may decide to supply information about any mobility-related issues faced by occupants in support of your application.

**You are not required to provide any Special Category information as part of any application you make to us and your application will still be processed if you do not provide it.**

Special categories of particularly sensitive personal information require higher levels of protection than other personal data. Where you do supply such information, we will rely on the ground that it is being processed by us in furtherance of the establishment and exercise of your legal rights.

## If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested by us, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with products or services). In this case, we may have to cancel a product or service you have with us, or decline your application, but we will notify you if this is the case at the time.

## How is your personal data collected?

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

- Direct interactions.

You may give us your Identity, Contact, Financial Data and Procurement Data by filling in forms (eg Know your customer form) or by corresponding with us by post, phone, email or otherwise.

This includes personal data you provide or that you may have provided when you:

- apply for our products or services;
- complete KYC (know your customer) or CDD (customer due diligence)
- create an account on our website;
- subscribe to our service or publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey;
- submit a tender or quote;
- give us feedback; and
- have applied for products in the past, such as the Get Britain Building funding or Build to Rent funding

- Automated technologies or interactions.

As you interact with our website, or those of **third parties**, we may automatically collect Technical Data and Procurement Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

- Third parties or publicly available sources.

We may receive personal data about you from various **third parties** and public sources as set out [here](#) and as detailed below:

- Technical Data from the following parties:
  - analytics providers such as Google based outside the EU;
  - search information providers inside or outside the EU.
- Contact, Procurement Financial and Transaction Data from providers of technical, payment and delivery services inside or outside the EU.
- Identity Procurement and Contact Data from data brokers or aggregators based inside or outside the EU.
- Identity Procurement and Contact Data from credit reference agencies and CDD providers, publicly available sources such as Companies House and the Electoral Register based inside



the EU.

## How we process your information

We will only process your personal information if there is a lawful basis to do so. Most commonly, we will use your personal information in the following circumstances:

- When processing is necessary for the performance of a contract or when processing is required prior to entering into a contract with you.
- When 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, for example, for one of our statutory functions.
- When processing is necessary for compliance with a legal or regulatory obligation.
- To prevent and detect crime, including fraud

Generally we do not rely on consent as a legal basis for processing your personal data.

### [Read more](#)

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. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where it is this is required or permitted by law.

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.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [Contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new customer or supplier and to comply with our customer due diligence and “know your customer” (CDD/KYC) processes	(a) Identity (b) Contact (c) Procurement	(a) Performance of a contract with you  (b) Necessary in the public interest to prevent and detect fraud and money laundering  (c) Necessary to comply with a legal obligation

Purpose/Activity	Type of data	Lawful basis for processing
<p>To process and deliver your application for a service or product (or process a tender or quote supplied by you in response to our tendering an opportunity to provide goods, works or services, and to enter into a contract for the supply of any of these) including:</p> <p>(a) To manage payments, fees and charges</p> <p>(b) To collect and recover money owed to us</p> <p>(c) To evaluate and monitor our exposure to you including credit risk</p> <p>(d) To evaluate a tender or quote that you submit in accordance with our procurement policies and the Public Contracts Regulations 2015</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Transaction</p> <p>(e) Marketing and Communications</p> <p>(f) Procurement</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary in the public interest (eg to recover debts due to us or to perform our statutory functions)</p> <p>(c) Necessary to comply with a legal obligation</p>
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy notice</p> <p>(b) Asking you to leave a review or take a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p> <p>(e) Procurement</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation including obligations to prevent and detect fraud and money laundering</p> <p>(c) Necessary in the public interest (to keep our records updated and to study how customers use our products/services) or how suppliers interact with us when we are considering purchasing goods, service and works from them</p>
<p>To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for the public interest (for running our business, provision of administration and IT services, network security, to prevent and detect fraud and money laundering and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>

Purpose/Activity	Type of data	Lawful basis for processing
To use data analytics to improve our website, products/services, marketing, customer and supplier relationships and experiences	(a) Technical (b) Usage	Necessary in the public interest (to define types of customers for our products and services, and suppliers from whom we purchase goods, works and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To provide information to Government about the take-up and effectiveness of our programmes and to compile National Statistics	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications (f) Procurement	Necessary in the public interest to compile National Statistics (compiled from Aggregated Data) and provide information to Government

## Disclosures of your personal data

We require all **Third Parties** to respect the security of your personal data and to treat it in accordance with the law.

We may share your personal data with **Third Parties** for the purposes set out in the table above including third-party service providers, regulatory bodies and other Government departments and agencies.

### [Read more](#)

For example, our e-tendering tool (ProContract) is hosted by ProActis (Due North). If you register to use the ProContract e-tendering system, you will be required to agree to the ProActis Terms and Conditions of using the system, and also their privacy notice.

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. We or our Third Parties may transfer your personal information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

## **Retention**

Homes England will only retain your personal data for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, regulatory accounting, or reporting requirements.

### **[Read more](#)**

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal or regulatory requirements.

Details of retention periods for different aspects of your personal data are available in our retention schedule.

By law we have to keep basic information about our customers and suppliers (including Contact, Identity, Financial and Transaction Data) for a certain period after they cease being customers for tax and VAT purposes.

In some circumstances you can ask us to delete your data: see the Data Rights section for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

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# Help to Buy

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This section of our privacy notice applies to all applicants for and customers of the Help to Buy scheme.

It is important that you read this section of our privacy notice together with the main section of [privacy notice](#), or any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you. This is so that you are fully aware of how and why we are using your data.

## Information we collect

Homes England collects personal data about you through the Help to Buy application process. We may sometimes collect additional information from **third parties** including the Help to Buy agent to whom you submit your application. We will collect additional personal information throughout the course of your Help to Buy agreement.

### [Read more](#)

We will collect, store, and use the following categories of personal data about you:

- Name(s) of applicant(s)
- Address at the point of application
- Contact details
- Address details of the plot to be purchased Name of the Help to Buy Provider you are purchasing from
- Details of the date of build and completion dates
- Build type and layout of the Property to be purchased
- Contact details of your conveyancing solicitor
- Contact details of your financial advisor or mortgage broker
- Cost of the property you are purchasing
- Financial information (Bank details, income(s) etc.)

## How we process your information

We will only process your personal information if there is a lawful basis to do so. Most commonly, we will use your personal information in the following circumstances:

- When processing is necessary for the performance of a contract or when processing is required prior to entering into a contract with you;
- When 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, for example, for one of our statutory functions; or
- When processing is necessary for compliance with a legal obligation.

Generally we do not rely on consent as a legal basis for processing your personal data.

### [Read more](#)

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. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where it is this is required or permitted by law.

We may process your data for the following purposes:

- Assessing your application
- Making a decision as to whether to accept your application
- Verifying your identity

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

## **Disclosures of your personal data**

We may share your data with third parties, including third-party service providers and other Government departments and agencies.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

### [Read more](#)

Homes England shares your data with:

- Help to Buy Agents
- Target (mortgage administrator)
- Conveyancing Solicitors

These organisations act as our “data processor” for the purposes of the Help to Buy scheme. They may also act as a “data controller” in their own right. For more information on how these organisations process your personal data, please read their own privacy notices.

## **Retention**

Homes England has a records retention schedule that outlines how long we will retain information.

To determine the appropriate retention period for personal data collected as part of your relationship with us, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for

which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer participating in the Help to Buy scheme we will retain and securely destroy your personal information in accordance with our records retention schedule.

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# Contractors and agency workers

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This section of our privacy notice applies to all contractors and agency workers.

It is important that you read this section of our privacy notice together with the main section of our [privacy notice](#), or any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you. This is so that you are fully aware of how and why we are using your data.

## Information we collect

Homes England collects personal data about contractors and agency workers during the engagement process, either directly from contractors, tenderers or sometimes from an employment agency, intermediary or background check provider. We may sometimes collect additional information from third parties including former employers, former clients, credit reference agencies or other background check agencies.

We will collect additional personal information in the course of job-related activities throughout the period of your engagement.

### [Read more](#)

We may collect, store, and use the following categories of personal data about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth
- Gender
- Next of kin and emergency contact information
- National insurance number
- Copy of identification (Passport/driving licence)
- Bank account details
- Tax status information
- Start date
- Location of engagement or workplace
- Right to work documentation
- References and other information included in a CV or cover letter or as part of the tendering or engagement process)
- Prior employment records (including job titles, work history, working hours, training records and professional memberships)
- CCTV footage and other information obtained through electronic means such as swipe card records
- Information about your use of our information and communications systems
- Photographs



## How we process your information

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

1. Where we need to perform the contract we have entered into with you or the employment agency or intermediary through whom you are working.
2. Where we need to comply with a legal obligation.
3. 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.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest or for official purposes.

### [Read more](#)

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. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

We may process your data for the following purposes:

- Making a decision about your engagement.
- National Security Vetting and BPSS checking.
- Determining the terms on which you are engaged to work for us.
- Checking you are legally entitled to work in the UK.
- Paying you or any agency or intermediary
- Deducting tax and National Insurance contributions and other lawful deductions where required by law (e.g. under Chapter 10 ITEPA 2003).
- To notify you of any disaster or business continuity event, and recovery action.
- Making decisions about the terms of your engagement
- Assessing your suitability or qualifications for a particular job or task
- Making decisions about your continued engagement.
- Making arrangements for the termination of the engagement.
- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work.
- Complying with health and safety obligations.
- To prevent and detect fraud.
- To monitor your use of our information and communication systems to ensure compliance with our IT policies.

- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- Equality and diversity monitoring
- Publicising our activities (e.g., group photos of events, site visits, etc.).
- To ensure that gifts and hospitality you receive are documented in accordance with our policy
- To ensure that any potential conflicts between your work-related interests and your personal interests are identified and managed appropriately. This includes making a declaration of interest periodically or as requested and whenever a new conflict or potential conflict is identified and also in relation to investment information where required under the Market Abuse Regulation.
- To carry out relevant ‘people management’ responsibilities, if applicable to their terms of service as agreed with Homes England.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

## How we process “special categories” of more sensitive personal information

We may also collect, store and use the following “special categories” of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Information about your health, including any medical condition, health and sickness records.
- Biometric data.
- Information about criminal convictions and offences.

These “special categories” of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. Our data protection policy contains details of the safeguards which we are required by law to maintain when processing such data.

### [Read more](#)

We may process special categories of personal information in the following circumstances:

1. Where we need to carry out our legal obligations or exercise rights in connection with your engagement. For example:
  - We will use information personal information relating to medical conditions and disability to comply with employment and other laws (insofar as applicable to agency workers and contractors)
  - We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to comply with

employment law and other laws (insofar as applicable to agency workers and contractors)

2. Where it is needed in the public interest: for example, we will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equality and diversity monitoring and reporting.

3. In limited circumstances, with your explicit written consent. We do not need your consent to use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law (insofar as applicable to agency workers and contractors). In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your engagement with us that you agree to any request for consent from us.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

## Who is the information shared with

We may share your data with third parties, including third-party service providers and other Government departments and agencies.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

### [Read more](#)

Homes England shares your data with:

- A number of learning and development providers such as:
  - Eukleia
  - Clear Review (Performance Management System)
  - Cardinus
  - Civil Service Learning
  - IAM Roadsmart (essential car users)
  - Interactive Driving System
- Service providers such as:
  - Concur
  - Edenred

- Eventbrite
  - Redfern
  - Occupational Health provider
- Social Media Providers such as:
    - Facebook Workplace
    - Twitter

## **Retention**

Homes England will only retain your personal data for as long as necessary to fulfil the purposes for which it was collected.

### **[Read more](#)**

Homes England has a records retention schedule that outlines how long we will retain information.

To determine the appropriate retention period for personal data collected as part of your engagement, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer engaged by us we will retain and securely destroy your personal information in accordance with our records retention schedule.

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# Information Governance (Freedom of Information, Data Subject Request, Complaints, General Enquiries)

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This section of our privacy notice will inform you about how we look after your personal data when you contact us to make a freedom of information request, or exercise your data subject rights under data protection legislation, make a complaint or submit a general enquiry.

It is important that you read this section of our privacy notice together with the main section of our [privacy notice](#), or any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you. This is so that you are fully aware of how and why we are using your data.

## Information we collect

### Complaint

When you contact us to make a complaint, we will use the information you have provided to investigate your complaint in accordance with our [complaints procedure](#) and to respond to you with the outcome.

### Freedom of Information Request

When you contact us to make a freedom of information request, we will use the information provided to respond to you. It is our policy to publish our responses to freedom of information requests on our web site but we will not publish any information that identifies you as the requestor. We will also redact from the information that we provide in response to any freedom of information request all personal data that could identify any individual.

### Data Subject Request

When you contact us to make a data subject request, we will ask you to provide evidence of your identity and copies of identity documentation, to ensure that we only provide your personal information to you and not to third parties.

## [Read more](#)

We do not request any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

However, we recognise that where you write to us with a complaint, you may choose to provide us with information that falls within the definition of Special Categories of Personal Data.

**You are not required to provide this information and your complaint will still be processed if you do not provide it.**

## How we process your information

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

- Where necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us (for example, for one of our statutory functions).
- Where we need to comply with a legal or regulatory obligation including the Freedom of Information Act 2000, the Environmental Information Regulations 2004 and data protection legislation.

Generally we do not rely on consent as a legal basis for processing your personal data.

## Disclosures of your personal data

We may share your personal data with third parties including third-party service providers and other Government departments and agencies. This includes:

- Service providers who provide IT and system administration services to Homes England. For example, our complaints, freedom of information requests and data subject requests are processed using a cloud-based system (Microsoft Dynamics 365)
- Professional advisers including lawyers and auditors.
- Ministry for Housing, Communities and Local Government who are the sponsor body for Homes England and commissions Homes England to administer and deliver Government programmes
- HM Revenue & Customs, National Audit Office, regulators and other authorities who require reporting of processing activities in certain circumstances, including agencies involved in the prevention or detection of fraud and money laundering.
- Third parties who are mentioned in your complaint, including your landlord (but only if your landlord is a local authority or registered provider). If your landlord is not a local authority or registered provider, then we will not contact your landlord without your consent.

### Read more

We require all **third parties** to respect the security of your personal data and to treat it in accordance with the law. You can find Microsoft's contractual commitments in the [Online Services Terms](#). Microsoft's terms commit Microsoft to the requirements on processors in GDPR Article 28 and other Articles of GDPR. For more information please click [here](#).

We or the third parties may transfer your personal information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information. Microsoft relies on the Standard Contractual Clauses (also known as the Model Clauses) as a basis for transfer of data. The Standard Contractual Clauses are standard terms provided by the European Commission that can be used to transfer data outside the European Economic Area in a compliant manner. Microsoft has incorporated the Standard Contractual Clauses into all of its Volume Licensing agreements via the [Online Services Terms](#). The Article 29 Working Party has found Microsoft's implementation of the Standard Contractual Clauses is compliant.

## **Retention**

We retain personal information related to complaints for a period of **3 years** after the resolution of the complaint.

We retain information related to freedom of information requests and data subjects requests (including copies of identity documents provided in connection with a data subject request) for a period of **18 months** after the response has been provided.

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# Applicants for employment

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This section of our privacy notice applies to all individuals who apply for a position at Homes England.

It is important that you read this section of our privacy notice together with the main section of our [privacy notice](#), or any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you. This is so that you are fully aware of how and why we are using your data.

## Information we collect

Homes England collects personal data about applicants through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies.

We will collect additional personal information in the event that your application to Homes England is successful. After you start work, your information will be processed in accordance with our employee privacy notice, a copy of which will be provided to you with your offer letter.

## [Read more](#)

We will collect, store, and use the following categories of personal data about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth
- Gender
- Copies of right to work documentation (evidence to demonstrate your entitlement to work in the United Kingdom)
- References or other information that you may have included in a CV or cover letter or application form
- Records of your previous employment (including job titles, work history, working hours, training records and professional memberships and salary details)

## How we process your information

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

1. To process your application and to help us decide whether to make an offer of employment to you.
2. Where we need to comply with a legal obligation.



3. 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.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest or for official purposes.

### [Read more](#)

We may process your data for the following purposes:

- Making a decision about your recruitment or appointment.
- National Security Vetting and BPSS checking.
- Determining the terms on which you work for us.
- Checking you are legally entitled to work in the UK.
- To prevent and detect fraud.
- To conduct data analytics studies (such as recruitment trends) to review and better understand the profile of candidates who apply to us; and who amongst them are successful.
- Equality and diversity monitoring.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

## **How we process “special categories” of more sensitive personal information**

We may also collect, store and use the following “special categories” of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Trade union membership (only where you have mentioned this in your application eg where you list being a union representative in “positions of responsibility”).
- Information about your health, including any medical condition, health and sickness including pre-employment screening.
- Biometric data.
- Information about criminal convictions and offences.

These “special categories” of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. Our data protection policy contains details of the safeguards which we are required by law to maintain when processing such data.

We may process special categories of personal information in the following circumstances:

1. Where we need to carry out our legal obligations or exercise rights in connection your application. For example, we will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits; or
2. Where it is needed in the public interest: for example, we will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equality and diversity monitoring and reporting.
3. In limited circumstances, with your explicit written consent. However, we do not need your consent to use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of any offer of employment with us that you agree to any request for consent from us.
4. Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

### [Read more](#)

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. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal information without your knowledge or consent, in compliance with the rules mentioned above, where this is required or permitted by law.

### **Who is the information shared with**

We may share your data with third parties, including third-party service providers and other Government departments and agencies.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

## **Retention**

Homes England will only retain your personal data for as long as necessary to fulfil the purposes for which it was collected. Unsuccessful applicants' personal data will usually not be stored for longer than six months from the date of application.

### **[Read more](#)**

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. If you accept an offer of employment with us then our employee privacy notice will govern how we process your personal information. Records will be retained and destroyed in accordance with our records retention schedule, which you will be able to access from our intranet.

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# Former employees

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This section of our privacy notice applies to former employees of Homes England.

It is important that you read this section of our privacy notice together with the main section of our [privacy notice](#), or any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you. This is so that you are fully aware of how and why we are using your data.

## Information we collect

Homes England does not collect personal data from former employees after they have left our employment, but it may hold the information that was collected before and during the employment relationship, including:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth
- Gender
- Marital status and dependants
- Next of kin and emergency contact information
- National insurance number
- Copy of identification (Passport/driving licence)
- Bank account details, payroll records and tax status information
- Salary, annual leave, pension and benefits information
- Start date
- Location of employment or workplace
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process)
- Employment records (including job titles, work history, working hours, training records and professional memberships)
- Compensation history
- Performance information
- Disciplinary and grievance information
- CCTV footage and other information obtained through electronic means such as swipecard records
- Information about your use of our information and communications systems
- Photographs

## How we process your information

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

1. Where we need to perform the obligations in a contract we have entered into with you, such as the employment contract, or a settlement agreement. Some of the contractual obligations in these contracts continue after your employment has terminated, such as the duty to observe confidentiality.

2. Where we need to comply with a legal obligation.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).

2. Where it is needed in the public interest or for official purposes.

### [Read more](#)

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. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

We may process your data for the following purposes:

- Paying you and deducting tax and National Insurance contributions and other lawful deductions.
- Providing you with any employee related benefits to which you are entitled after the termination of your employment.
- To reimburse you for expenses incurred in the course of your employment.
- Liaising with your pension provider and the trustees/administrators of pension schemes.
- Administering any contract we have entered into with you.
- Business management and planning, including accounting and auditing.
- Gathering evidence for possible grievance or disciplinary hearings.
- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work.
- To prevent and detect fraud.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- To conduct data analytics studies (such as the staff survey) to review and better understand employee retention and attrition rates.
- Equality and diversity monitoring
- Publicising our activities (e.g., group photos of events, site visits, etc).

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

## How we process “special categories” of more sensitive personal information

We may also store and use the following “special categories” of more sensitive personal information that we have collected from you:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Trade union membership.
- Information about your health, including any medical condition, health and sickness records.
- Biometric data.
- Information about criminal convictions and offences.

These “special categories” of particularly sensitive personal information require higher levels of protection. We need to have further justification for storing and using this type of personal information. Our data protection policy contains details of the safeguards which we are required by law to maintain when processing such data.

### [Read more](#)

We may process special categories of personal information in the following circumstances:

1. Where we need to carry out our legal obligations or exercise rights in connection with employment.
2. Where it is needed in the public interest: for example, we will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equality and diversity monitoring and reporting. Where possible, we would seek to anonymise this data.
3. In limited circumstances, with your explicit written consent. However, we do not need your consent to use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else’s interests) and you are not capable of giving your consent, or where you have already made the information public.

## Who is the information shared with

We may share your data with third parties, including third-party service providers and other Government departments and agencies.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

### [Read more](#)

Homes England shares your data with:

- Occupational Pension Scheme Trustees and Administrators.
- Service providers such as:
  - Concur – employee expenses
  - Edenred – employee benefits e.g. childcare vouchers
  - OH Assist – employee assistance programme
  - Equifax – BPSS identity check
  - Redfern – employee travel and accommodation service
  - Occupational Health providers
  - Nuffield – employee health screening
  - Clear Review - performance management system
- Trade Unions of which you are a member including PCS, Unison and Unite
- Social Media Providers for employee engagement and communication such as:
  - Facebook Workplace
  - Twitter

## **Retention**

Homes England will only retain your personal data for as long as necessary to fulfil the purposes for which it was collected.

### [Read more](#)

Homes England has a records retention schedule that outlines how long we will retain information.

To determine the appropriate retention period for personal data collected as part of your employment, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee we will retain and securely destroy your personal information after the following periods

- o 12 months from date of leaving for employees; except
- o Payroll, tax and NIC records which must be retained required for 6 years. This is a legal requirement.

However, these periods only apply to your employment records and not for example to images and materials created and use for marketing and communication purposes (eg group photographs taken at away days etc). If you are concerned about the retention and use of any such materials please see the Data Rights section below.

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# Home Building Fund and Affordable Housing Programme (and legacy programmes)

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This section of our privacy notice aims to give you information on how Homes England collects and processes your personal data when you contact us in connection with an enquiry about, or an application for, Home Building Fund funding or Affordable Housing funding (AHP), including any data you may provide to us when you apply.

In this privacy notice, references to the Home Building Fund should also be taken as including two legacy programmes, Get Britain Building and Build to Rent, which are closed to new applications. It also includes the other legacy programmes that have been amalgamated into the Home Building Fund (Builders Finance Fund, Custom Build Serviced Plots Loan Fund, Housing Zones, Local Growth Fund (Housing Infrastructure) and Large Sites Infrastructure Programme).

It is important that you read this section of our privacy notice together with the main section of our [privacy notice](#), or any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you. This is so that you are fully aware of how and why we are using your data.

## Information we collect (or may have collected from you in the past)

Personal data, or personal information, means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data, data such as:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, nationality and gender.
- **Contact Data** includes Residential address, email address and telephone numbers.
- **Financial Data** includes bank account / statement details and information about the financial status of you or your business, including ownership structures and shareholdings etc.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have acquired from us.
- **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 this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.

- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

## How we process your information

We will only process your personal information if there is a lawful basis to do so. Most commonly, we will use your personal information in the following circumstances:

- When processing is necessary for the processing of your application or in connection with any loan or funding agreement or when processing is required prior to entering into an agreement with you (such as Customer Due Diligence or completing a Know your client form).
- When 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, for example, for one of our statutory functions.
- When processing is necessary for compliance with a legal or regulatory obligations.

Generally we do not rely on consent as a legal basis for processing your personal data.

### [Read more](#)

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. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where it is this is required or permitted by law.

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.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [Contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out examples of which are provided in the table below.

Purpose/Activity	Type of data	Lawful basis for processing
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Purpose/Activity	Type of data	Lawful basis for processing
<p>To register you as a customer/applicant for the Home Building Fund or AHP funding and to comply with our customer due diligence and “know your customer” (CDD/KYC) processes</p>	<p>(a) Identity &amp; Address verification (b) Contact (c) Profile (d) Financial</p>	<p>(d) Performance of a contract with you (e) Necessary in the public interest to prevent and detect fraud, money laundering, Terrorism Financing and other Financial Crime related activity. (f) Necessary to comply with a legal or regulatory obligation</p>
<p>To process and deliver your application for a Home Building Fund loan, or AHP funding or other product including:</p> <p>(a) To manage payments, fees and charges (b) To collect and recover money owed to us (c) To evaluate and monitor our exposure to you including credit risk</p>	<p>(a) Identity&amp; Address verification (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications</p>	<p>(a) Performance of a contract with you (b) Necessary in the public interest (eg to recover debts due to us or to perform our statutory functions) (c) Necessary to comply with a legal obligation</p>
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy notice (b) Asking you to leave a review or take a survey</p>	<p>(a) Identity&amp; Address verification (b) Contact (c) Profile (d) Marketing and Communications</p>	<p>(a) Performance of a contract with you (b) Necessary to comply with a legal obligation including obligations to prevent and detect fraud, money laundering, Terrorism Financing and other Financial Crime related activity. (c) Necessary in the public interest (to keep our records updated and to study how customers use our products/services)</p>
<p>To administer and protect our business and our Home Building Fund website or AHP application portals (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity&amp; Address verification (b) Contact (c) Technical</p>	<p>(a) Necessary for the public interest (for running our business, provision of administration and IT services, network security, to prevent and detect fraud and money laundering and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation</p>

Purpose/Activity	Type of data	Lawful basis for processing
To use data analytics to improve our Home Building Fund website or any AHP portal, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary in the public interest (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To provide information to Government about the take-up and effectiveness of the Home Building Fund or AHP funding and to compile National Statistics	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	Necessary in the public interest to compile National Statistics (compiled from Aggregated Data) and provide information to Government

## Disclosures of your personal data

We may share your personal data with Third Parties for the purposes set out in the table above including third-party service providers, regulatory bodies and other Government departments and agencies.

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. We or our Third Parties may transfer your personal information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

## Retention

Homes England will only retain your personal data for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, regulatory, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention schedule which you can request from us by contacting the Data Protection Officer. By law we have

to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for a certain period after their relationship ceases for tax and VAT purposes.

In some circumstances you can ask us to delete your data: see the Data Rights section for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

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# Buildings/Sites/Premises

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This section of our privacy notice applies to visitors to buildings, sites or other premises owned or controlled by Homes England.

It is important that you read this section of our privacy notice together with the main section of our [privacy notice](#), or any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you. This is so that you are fully aware of how and why we are using your data.

## **Information we collect and how it's processed**

We have security measures in place at our buildings and sites, including in some cases the use of CCTV and building access controls. This is to deter, prevent and detect crime at our premises and ensure only those people who are entitled to be admitted gain access to our premises/

Where CCTV is in use, there are signs in place to notify any individuals. The images captured are securely stored and only accessed on a need to know basis (e.g. to look into an incident).

We require visitors to our offices to sign in at reception and we keep a record of visitors for a short period of time.

## **Retention**

CCTV recordings are typically automatically overwritten after a short period of time unless an issue is identified that requires investigation (such as a theft).

Our visitor records are securely stored and only accessible on a need to know basis (e.g. to look into an incident).

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