



Privacy Notice

April 2025

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Part 1: Introduction

1.1 The General Data Protection Regulation (UK GDPR)

1.1.1 The processing of personal data in the United Kingdom is regulated by law, principally the United Kingdom General Data Protection Regulation ("UK GDPR") and the Data Protection Act 2018 ("DPA 2018"). Other laws inter-relate with the Act and the UK GDPR including but not limited to the Privacy and Electronic Communications Regulations (2003) ("PECR"). In addition, various guidelines, codes of practice, and case law contribute to the Data Protection Legislation.

1.1.2 For independent advice about data protection and privacy concerns in the UK, you can contact the Information Commissioner (ICO) online at www.ico.org.uk or by phone on 0303 123 1113.

1.1.3 settle group and each of its subsidiaries are registered with the ICO as follows:

	ICO Notification Number
settle group	Z7725378
Rowan Homes Limited	ZA245168

1.2 The Notice

1.2.1 settle group ("the Group") is a non-profit making social business limited by guarantee and registered with the Regulator of Social Housing (RSH). Where we refer to "we" or "us" in this Privacy Notice, we are referring to settle group or one of our subsidiaries. The Group consists of one subsidiary, Rowan Homes Limited.

1.2.2 Service delivery within the Group is governed and controlled by a series of intra group and service level agreements that clearly set out the services to be provided by each Company, their rights and responsibilities and ensures the smooth running of the organisation.

1.2.3 settle group and its subsidiary, Rowan Homes Limited are "data controllers" of your personal identifiable information. The data controller is responsible for determining the means of collection and the use of this information.

1.2.4 settle group ("the Group") needs to collect and process personal data to deliver services such as:

- Tenancy management & property maintenance services,
- Providing, managing and developing affordable housing,
- Delivering independent living services,
- Helping to support individuals to prosper and contribute to their community.

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- 1.2.5 We are committed to handling your personal information fairly, lawfully and securely in line with current data protection laws.
- 1.2.6 We take your privacy seriously and this privacy notice explains the categories of personal data we process and for what purposes. It explains the personally identifiable information we will collect and hold about you. This information may be provided by you or from a third party.
- 1.2.7 By reading this notice you will understand what to expect when settle group processes your personal information and your rights in relation to your data. It applies to information about tenants, home owners, non Settle tenants, housing applicants, potential home buyers, employees, job applicants, board members and other service users.
- 1.2.8 We keep our privacy notice under regular review and we will place any updates on our website (www.settlegroup.org.uk) if you would like to receive a printed copy of our privacy notice, please contact our customer contact centre. This privacy notice replaces any previous notices that we have published about using your personal identifiable information.
- 1.2.9 If you have any questions about how we use your personal information, 'the Groups' Data Protection Officer can be contacted by email at dpo@settlegroup.org.uk or by post at "The Data Protection Officer", Blackhorse Road, Letchworth Garden City, Hertfordshire. SG6 1HA

Part 2: Your Eight Privacy Rights

2.1 The right to be informed

This privacy notice informs you of who is obtaining and using your personal information, how this information will be retained, shared and secured and what lawful grounds will be used to obtain and use your personal identifiable information.

2.2 The right of access

You have the right to obtain a copy of the personal information we hold about you. This is known as a "subject access request" (SAR). A request for data can be made in writing, via telephone or email us to request subject access request form. We ask that your request is accompanied by proof of your address and identity. In accordance with the Data Protection Act (DPA) we must provide you with the information pertaining to your request within 30 days.

If you are seeking to obtain specific information, it helps if you clarify the details of what you would like to receive in your request. If someone is requesting information

on your behalf, they will need written confirmation from you to evidence your consent in order for us to release this and proof of ID (both yours and theirs).

2.3 The right to rectification

You can ask us to rectify your personal data if it is inaccurate or incomplete. Please help us to keep our records accurate by keeping us informed if your details change.

2.4 The right to erasure

The right to erasure is also known as “the right to be forgotten”. In some circumstances, you can ask us to delete or remove personal data where there is no compelling reason to continue to hold it. This is not an absolute right, and we will need to consider the circumstances of any such request and balance this against our need to continue processing the data, and any legal/regulatory requirements for the data.

2.5 The right to restrict processing

You can object and ask us to restrict processing if you feel that we are using your personal information unlawfully and/or holding inaccurate, inadequate or irrelevant personal identifiable information which if used may have a detrimental impact on you and/or has an impact on your rights.

2.6 The right to object

You have the right to object to how we use your personal identifiable information in certain circumstances as well as the right to obtain a copy of the personal identifiable information we hold about you. This is not an absolute right and can depend on settle’s justifications as to whether this right is upheld.

2.7 The right to data portability

For such companies as utility providers (e.g. gas, electricity suppliers), you can request that information you have provided to them, such as meter readings be transferred to another company. If the situation arises where it would be helpful for you to move, copy or transfer personal data we hold about you, across different services, you may be able to ask us to do this.

2.8 Rights in relation to automated decision making and profiling

You can ask us to review any decisions that are determined by automated means, and object to our use of your personal data for profiling activities.

Part 3: Contact and Complaints

- 3.1 To make enquiries for further information about exercising any of your rights in this privacy notice, then please contact us by email at dpo@settlegroup.org.uk or by post at “The Data Protection Officer”, Blackhorse Road, Letchworth Garden City, Hertfordshire. SG6 1HA

- 3.2 You can also make a complaint to the relevant data protection supervisory authority. Where your personal identifiable information is held and processed in the UK, you can complain to the Information Commissioner's Office, at www.ico.org.uk.

Part 4: Lawful reasons for using your personal information

PERSONAL DATA PROCESSED	LAWFUL BASIS	PURPOSE FOR PROCESSING
<p>Special category information - Sensitive information about your health status, racial or ethnic origin, political views, religious or similar beliefs, sexual orientation, or criminal convictions and allegations.</p> <p>Health – to support our housing functions and vulnerable customers; Ethnicity – to support our equality monitoring purposes; Religion - to support our equality monitoring purposes; Sexual life or sexual orientation - to support our equality monitoring purposes, and; Convictions – to prevent and detect anti-social behaviour, crime, fraud, anti-money laundering and to aid in the prosecution and rehabilitation of offenders.</p>	Legal obligation	<p>It is necessary for us to so do to protect your vital interests (e.g. if you have a severe and immediate medical need); It is in the substantial public interest; (e.g. to protect vulnerable people</p> <p>It is necessary for the prevention or detection of crime; It is necessary for insurance purposes; or You have specifically given us consent to use the information.</p>
<p>Contact details Identity data</p>	Legal obligation	<p>To confirm a person(s) eligibility for housing and their right to reside in the country. We will need to obtain details your citizenship, previous countries you have lived, and a copy of identification documents (such as passport, home office residence papers and driving license).</p>

		To help support our customers who have a vulnerability and/or receive a support service from us we might also need health and social care information (such as physical, social or mental health information or medication).
We will collect detailed personal information about you and other household members, including age, gender, date of birth, ethnicity, income, National Insurance number, income and benefits details, employment status, gender identity, relationship status, any disabilities, any communication and accessibility requirements, religion, sexuality, nationality, caring responsibilities, access to financial services such as banks and credit unions, bank details, benefits, council tax, medical information or details of any unspent criminal convictions.	Legitimate Interests	<p>To assess service eligibility and complete tenancy sign-ups; to complete our assessments (e.g. affordability) and subsequently if we sign-you-up to our services. Without this information, we will be unable to accept an application for services</p> <p>information relating to other occupants who will be living in our premises, to ensure that accommodation offered is adequate for current and the short/medium term needs of your family, to check that household members' needs are being met and to ensure that the surrounding community will have quiet enjoyment of their homes.</p> <p>To manage and administer our tenancies, leasehold agreements or support services.</p>
Up to date contact details (telephone number and email address)	Legal or Regulatory obligations Contractual obligations	<p>So we can reach you when we need to discuss your services, e.g. payments, essential servicing, access for repairs, maintenance and improvements, to resolve or investigate complaints or housing management issues such as antisocial behaviour and to enforce the terms of your tenancy/lease.</p> <p>We may ask you for supporting information about any change in circumstances or to make changes to</p>

		<p>your tenancy. For example; if you have a medical need that means your housing requirements need to be re-assessed; or if you want to change your name on our records.</p> <p>We will hold records of all our contact with you, your contact with us, and any contact from third parties representing you or about you. This include call recordings.</p> <p>We will keep financial records about the money you have paid us, any amounts outstanding and our actions to recover that money. Depending on how you pay; we may hold your bank account details, or share/receive information from payment bureaus such as AllPay. Where you are in receipt of certain benefits, we will receive information from and share information with relevant agencies.</p> <p>We may also use your contact information to communicate with you about products or services which may help you sustain your tenancy, and news stories relating to settle group.</p> <p>Without this information, we may be unable to adequately provide your services</p>
Your personally identifiable and special category information as well as information about vulnerabilities or your behaviour.	Legal and Regulatory obligations	<p>We may hold information about vulnerabilities or your behaviour if we need to ensure services are tailored to meet your needs, or to look after our staff or anyone else working on our behalf.</p> <p>Indicators may be placed on your record and shared with contractors and subcontractors to ensure health and safety measures are in place. We would have informed you of the reason for this indicator, when it will be applied and for</p>

		<p>how long. For example, a marker is applied for a tenant with a mobility restriction, to ensure that sufficient time is given for the tenant to answer the door.</p> <p>We may capture your image on our CCTV systems if you visit one of our offices or residential buildings covered by this facility. Signage at each location provides details of the purpose of the system.</p> <p>To fulfil our health & safety and crime prevention obligations and to support our vulnerable people.</p>
Your personally identifiable and special category information.	Vital Interests Legal and regulatory obligations	<p>Where is it deemed necessary to protect you or others.</p> <p>We do this where you or another person is at risk of physical, mental, sexual, harm or damage or where it is believed there is a risk to life to you or other persons.</p> <p>Where you or another person needs to be protected as a vulnerable person from significant harm or serious exploitation.</p> <p>When you engage with our teams to obtain extra support, guidance or advice.</p>
<p>We use your personally identifiable information such as :-</p> <p>Contact details – name, address, email, home and mobile telephone numbers; Age – date of birth, age range. Gender. Identification – information to allow us to check your identity (e.g. official documents);</p>	Legitimate interest Contractual obligation	<p>To ensure our tenancies are sustainable, and it is necessary to fulfil the contractual relationship formed with you when you engage with us. Where information relates to other household members, it is in our legitimate interests to ensure that we are providing the correct advice based on your exact circumstances. By choosing not to provide information it may not be possible to provide the correct advice and fully benefit from the service.</p>

<p>Financial information – information about your financial circumstances, or where you make payment by credit/debit card.</p> <p>Photograph – information to record your identity;</p> <p>On-line computer identifiers (IP address) – information recorded when you engage with us electronically.</p> <p>National insurance numbers – information to carry out functions such as universal credit and/or personal support services.</p> <p>Next of kin – contact details.</p>		
Information about your education, job history and skills and experience.	Legitimate interest	Our training and employability teams can support you to improve your financial circumstances our Financial Inclusion advisors may hold detailed information about your household income and expenditure.
Information about settle Group's Board and Committee members	Contractual obligation and Legitimate interest	Our governance team may hold as part of their duties, recruitment, skills appraisals and remuneration
Your contact details and your personally identifiable information.	Legitimate interest	<p>To monitor our performance in regard to our services we provide to you.</p> <p>To understand how we are performing so we can meet our goals and objectives.</p> <p>To carry out research and customer satisfaction surveys to help us to monitor our performance and to improve our services to our customers.</p> <p>To undertake call recordings for training and quality monitoring purposes.</p> <p>To perform statistical analysis to manage and reduce complaints, or to help us target our resources and prioritise services</p>
<p>Data relating to your:-</p> <p>Ethnicity</p> <p>Religion data</p> <p>Sexual life or sexual orientation</p>	Legal obligation	<p>In order to comply with our housing regulator.</p> <p>To process the information or to demonstrate to our regulator that we are fulfilling our obligations, for example</p>

		equality laws and to support our equality monitoring purposes.
Your personal identifiable information you have given us e.g. by post, email, text message, or social media.	Contractual obligation	To fulfil our contractual obligations in providing our services to you To communicate with you for operational purposes.
Your personal identifiable information you have given us e.g. by post, email, text message, or social media.	Legitimate interest Legal/ Regulatory obligations	To communicate with you about products and services which relate to services you already receive from us, and to keep you up to date with news and events which meet our objectives around social inclusion and helping to build communities. Where you have given us consent to receive marketing, you can withdraw consent and update your marketing preferences by contacting us.
Personal identifiable information relating to recruitment. Such as:- CVs of graduate applicants. Attendance and examinations records Name, address, email address, contact numbers, date of birth, exam records, attendance records Health data/ disability, Racial or ethnic origin, religious beliefs.	Legitimate Interest	To provide our graduates with proper training and further qualifications To process the personal data of our Graduates to enrol them to the GEM Programme and provide training to pursue a housing qualification.

Part 5: The data we hold and how we collect it

- 5.1 Depending on the products and services we deliver to you, the types of personally identifiable information used will vary. We will only collect personal information when we need it. When you provide your information, we will explain why we need it. We will also explain when information is optional and the impact of not providing this.
- 5.2 For most products and services, we need to use some or all the following items of personally identifiable information about you, occupants of your home, or your representatives:
- a) Personal information
 - Contact details – name, address, email, home and mobile telephone numbers;
 - Age – date of birth, age range;
 - Gender;
 - Identification – information to allow us to check your identity (e.g. official documents);
 - Financial information – information about your financial circumstances, or where you make payment by credit/debit card;
 - Photograph – information to record your identity;
 - On-line computer identifiers (IP address) – information recorded when you engage with us electronically;
 - National insurance numbers – information to carry out functions such as universal credit and/or personal support services, and;
 - Next of kin – contact details.
 - b) Special category information
 - Health – to support our housing functions and vulnerable customers;
 - Ethnicity – to support our equality monitoring purposes;
 - Religion - to support our equality monitoring purposes;
 - Sexual life or sexual orientation - to support our equality monitoring purposes, and;
 - Convictions – to prevent and detect anti-social behaviour, crime, fraud, anti-money laundering and to aid in the prosecution and rehabilitation of offenders.
- 5.3 We may collect a reduced set of information for the other occupants of your property unless they also have a direct relationship with us (e.g. obtain services from us directly).

- 5.4 Supplying your personally identifiable information may be essential to enter into a contract/agreement with you or to meet some of our legal or regulatory duties. Examples of these are:
- Tenancy or leaseholder agreements;
 - Support Service;
 - Processing housing or council tax benefit, and;
 - Equality monitoring and regulatory reports.
- 5.5 If you choose not to supply the personal information required, then we may not be able to provide some of our housing support or products and services.
- 5.6 Most of the time the personal information we hold about you is information you have given to us or has been gathered by us when we provide products and services to you.
- 5.7 We may also obtain information from third parties such as the local authority, your doctor (or other health professional), a previous landlord or another relevant community partner. In addition, we may also obtain information from publicly accessible sources or engage the service of research organisations to validate, or where appropriate, enhance the information that we hold. Examples of our means of collecting data include:
- Directly from you - in person, by email, telephone, text message, letter or form;
 - By observing how you use our housing, support, products and services, or those of other members of the Group, for example from the transactions and operation of your accounts and online services;
 - From other organisations such as former housing and support providers, health and social care agencies, law enforcement agencies, debt collectors, energy or utility companies, benefit agencies and/or credit reference and fraud prevention agencies;
 - From other people you know and/or are linked to you - for example; a joint tenant, a relative, a person nominated to act on your behalf, your legal representative, or people who live in the same community as you (e.g. those making reports of antisocial behaviour);
 - From monitoring or recording calls as part of quality and complaint monitoring. We record these calls for training and to ensure the safety of our staff. We will not record any payment card details as part of our accounts and payments operations;
 - From the CCTV systems for the prevention and detection of crime or to detect damage/ vandalism to our properties and to ensure the safety and security of our staff and individuals obtaining services from us.

PERSONAL DATA PROCESSED	LAWFUL BASIS	PURPOSE FOR PROCESSING
On occasion, data can be provided by tenants relating to neighbours who are not settle tenants. Where this is the case we may collect the following information about neighbours: contact details and identifiable personal information (telephone number and email address) of non tenants of settle ie. homeowners.	Legitimate interest / Contractual agreement/ Legal or regulatory obligations	We may use personally personal information to meet the conditions set out in the, as follows: So that we can reach our tenants and non-tenants such as private homeowners when we need to discuss related services, e.g. payments, essential servicing, access for repairs, maintenance and improvements, to resolve or investigate complaints or housing management issues such as antisocial behaviour /neighbour disputes and to enforce the terms of your tenancy/lease.

Part 6: Sharing your personal information

- 6.1 We will share your personal information within settle group and with others outside the Group where we need to do that to provide products and services to you, market products and services to you, meet or enforce a legal obligation or where it is fair and reasonable for us to do so.
- 6.2 Who we share your personal information with depends on the products and services we provide to you and the purposes we use your personal information for. For most products and services, we will share your personal information if it is in our legitimate interests to do so without seeking your consent first. This may be with:
- Our contractors to facilitate repairs, maintenance or improvement works.
 - Debt and money management advisors.
 - Local authority teams such as social services, environmental health and benefit agencies.
 - Utility companies (and their representatives) and Council Tax Departments to ensure billing details are correct.
 - Third parties providing services on our behalf. For example, a mailing company distributing our newsletter; a research company carrying out a customer satisfaction survey, or a debt collection agency pursuing former tenant arrears.
 - Agencies committed to protecting public funds and/or preventing fraud in line with the National Fraud Initiative.

- Police and other relevant authorities (e.g. Department of Work & Pensions, Probation Service, HM Revenue and Customs) in relation to the prevention and detection of crime, the apprehension of offenders or the collection of tax or duty.
- Other statutory organisations e.g. social services and health authorities as necessary for exercising statutory functions.
- First Actuarial, which has been entrusted in providing employer pension services such as pension benefits advise and related services.
- Centre for Partnership to assess the eligibility of our Graduates to be enrolled within the GEM Programme and facilitate the development of our Graduates.
- Personal data may also be shared to consultancies for monitoring or benchmarking employee performance for example.

6.3 Where the information is of a sensitive nature, for example about your health, we will generally obtain consent from you prior to sharing this information, unless we are required or permitted to share this by law.

6.4 We may also share information when required by law for example where ordered by the Court or to protect an individual from immediate harm.

6.5 settle group will never sell your personal data to third-party organisations for marketing purposes.

Part 7: Automated decision making

Sometimes we use your personal identifiable information in automated processes to make decisions about you, for example determining your position on a housing waiting list or eligibility for a mutual exchange. We do this to help ensure decisions are made accurately, fairly and efficiently and to offer you services tailored to you. You have a right to challenge the validity of any decisions made in this way. You may also ask us not to process your information in this way. Contact us if you would like more information.

Use of Artificial Intelligence

As part of Settle's recruitment process, the Teamtailor Applicant Tracking System will process the data for people who apply for roles at Settle. This includes name, address, work history and diversity data. The system will use an AI powered summarisation feature, which is used to append the candidates' profile with a summary. The data generated will not be a decision-making data or a data used to 'rank' or 'promote' candidates. Thus reduces the risk of AI bias. It remains the responsibility of the hiring manager to use the un-edited CVs data to make decisions.

The use of AI in the Teamtailor Applicant Tracking System will therefore not be making any automated decisions on a candidates' application. The aim in using this AI summarisation feature is to reduce unconscious bias.

Settle has ensured appropriate action is taken with the use of the AI in order to meet the principles, specifically transparency and purpose limitation in line with the ICO's recommendations.

Part 8: Transfers outside the UK

To ensure the safety and security of information you provide, it will not generally be transferred or processed outside of the UK and EU. There may be occasions where we need to process your information outside of the European Economic Area (EEA), for example where we use a third-party computer system within the USA to distribute marketing emails or complete internet-based surveys. Where we do this, any personally identifiable information will be limited, we will communicate where the information you provide will be stored, and we will take all necessary steps to ensure that your information remains as secure as possible.

Part 9: Retaining and storing your personal information

- 9.1 The length of time we keep your personal information for depends on the services we deliver to you. Documents are retained in accordance with the latest Document Retention guidelines for Housing Associations published by the National Housing Federation. These are available on request. We will never retain your personal identifiable information for any longer than is necessary for the purposes for which we need to use it.
- 9.2 settle group will apply appropriate technical and organisational measures to ensure your personal information is secure.
- 9.3 When we need to engage a contractor or third-party suppliers to process your personal information, our contracts with them shall include strict controls on their security and confidentiality protocols.
- 9.4 To help us ensure confidentiality of your personal information we will ask you or anyone contacted on your behalf security questions to confirm your identity. We will not discuss your personal information with anyone other than you unless you have given us prior written authorisation to do so or where we have received a clear verbal instruction from you.
- 9.5 If we need to share your personal information with one of our third parties it will be protected with suitable encryption software.

Part 10: Online Activity

10.1 Information we collect when you visit our website

- Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another, allowing a website to provide you with a personalised experience and the website owner with statistics about how you use the website so that it can be improved. Some cookies may last for a defined period of time, such as one day or until you close your browser. Others last indefinitely. Your web browser should allow you to delete any you choose. It also should allow you to prevent or limit their use.
- We use cookies in the following ways:
 - ✓ to track how you use our website.
 - ✓ to record whether you have seen specific messages we display on our website;
 - ✓ to keep you signed in to our site;
 - ✓ Analytical/performance purposes – this allows us to recognise and calculate the number of visitors and to see how visitors navigate around the website when they are using it. Therefore, helping us improve our website functionality for example, by ensuring that users can find what they are looking for easily;
 - ✓ Functionality purposes – to help us recognise you when you return to our website. This allows us to personalise our content for you and remember your preferences and settings (e.g. your choice of language or region);
 - ✓ Recruitment statistics – to allow us to monitor the download statistics of job packs and other downloadable content.
- Please see our information on cookies and privacy here <https://www.settlegroup.org.uk/cookies-and-privacy>
- When you first visit our website, we ask you whether you wish us to use cookies. If you choose not to accept them, we shall not use them for your visit except to record that you have not consented to their use for any other purpose. By choosing this option, you will not be able to use all the functionality of our website.
- The software platform this website runs on and associated technology operations are provided by Granicus LLC. Click this link for the Privacy Policy governing their service.

10.2 Personal identifiers from your browsing activity

- Requests by your web browser to our servers for web pages and other content on our website are recorded.
- We may record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.
- We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.
- If combined with other information we know about you from previous visits, the data possibly could in theory be used to identify you personally, even if you are not signed in to our website.

10.3 Third party advertising or notices on our website

- We do not currently have any third-party advertisements on our website. If this changes in future, we will update this notice accordingly.
- At present, we may provide information about third party events or services, with a click through link to further information. In doing so, those parties, their agents or other companies working for them may use technology that collects information about you when you use such a link.
- They may also use other technology such as cookies or JavaScript to personalise the content of, and to measure the performance of their adverts.
- We do not have control over these technologies or the data that these parties obtain. Accordingly, this privacy notice does not cover the information practices of these third parties.

10.4 Use of our website by children

- We do not provide services to children directly though we recognise they may be part of the household of one of our residents.
- If you are under 18, you may use our website only with consent from a parent or guardian.
- We collect data about all users of and visitors to these areas regardless of age, and it is possible that from time to time some of those users and visitors will be children.