



whg SALES CUSTOMERS' PRIVACY NOTICE

whg needs to hold and process information about you and your circumstances. Some of this information is personal data; this means it can be used to identify you. The law gives you rights around what happens to this personal information.

This Privacy Notice is for prospective purchasers of homes for shared ownership. It tells you who we are, what information we will collect, how we will use it, who we will share it with and how we will keep it.

About whg

whg is a Data Controller registered with the Information Commissioner's Office, registration reference Z667510X.

"whg" means Walsall Housing Group Limited, a registered provider of social housing. Our registered company address is 100 Hatherton Street, Walsall WS1 1AB.

More information about the organisation can be found on our website at www.whg.uk.com or please ask a colleague from the Sales team.

The Data Protection Officer for whg is Suzanne Gill. She can be contacted at DataProtection@whgrp.co.uk

What information we process about you and why

This is the information we will collect/process and how we will use it:

DATA WE PROCESS

PURPOSE

	To register your interest in buying a property
Your name and contact details (address, phone numbers, email address)	For marketing purposes – to send you details of properties you may be interested in. We may do this by post/email/text.
	To arrange any necessary repairs in the 12 months defects period
Current housing situation (renting / own home etc.)	To establish your eligibility to buy a shared ownership property
Working status/salary/dates of employment	
Proof of savings	To buy a shared ownership property



Details of your solicitor.

To process the sale.

Details of your mortgage and mortgage lender.

Ethnicity*

To monitor equality of opportunity

Nationality

To monitor equality of opportunity.

* Some of the above information that we need to collect is sensitive in nature and is in a 'special category' i.e. ethnicity.

Lawful basis for collecting and processing your information

The law says that we must meet a legal condition under the Data Protection Act 2018 before we can process (which includes sharing) your personal data. The conditions which apply for the personal data that we process for prospective purchasers are:

- **To enter into a contract:** to purchase one of our homes
- **Necessary for compliance with a legal obligation:** for example, in relation to anti money laundering regulations.
- **Our legitimate interests:** this allows us to collect your non-sensitive information (name, contact details) and where necessary share it with our partners for our own administrative purposes, to ensure compliance with whg policies and to set up your utility services etc.
- **Consent:** For marketing purposes to send details of properties you are interested, referrals to financial advisors and providing 'special category' data i.e. ethnicity

The conditions that apply for processing special categories of personal data are as follows:

- **The processing is necessary to monitor equality of opportunity or treatment:** ethnic origin/nationality.

Statutory or contractual requirements

Most of the personal data that we hold about you is processed to fulfil a **contractual obligation** (between whg as the vendor of the property and you as our customer) or a legal obligation (providing your details to the Land Registry).

Failing to provide your personal data would mean that we would be unable to sell you a property.

Who we will share your information with



We will share some or all of the information we hold about you with:

- Other companies that deliver services on behalf of whg, for example:
 - Expert Agent – to process your application
 - Independent Financial Advisor – to carry out an affordability assessment
 - Solicitors
 - Developers – to carry out repairs in the defects period
- Utility providers – to set up your services
- Your local Council – for payment of Council Tax
- Land Registry

If asked to do so, we may share your information with the police for the prevention and detection of crime, including fraud and benefit fraud.

We only share the minimum amount of personal data necessary to enable us to fulfil our legal obligations.

We will not sell your personal data.

Keeping your information

We will usually keep this information for:

- 12 years after completion for leases
- For as long as you own an interest in the property plus one year – for contact details and information about the original purchase
- For customers who don't proceed with purchase contact and personal details will be kept for one year after initial contact

whg uses our industry standard Document Retention Schedule to determine retention periods.

We will store your information securely in computer systems or in certain circumstances in manual files. We will dispose securely of all information when we no longer have a contractual relationship with you.

Your rights

You have the following rights set out in law concerning your personal information – the right to:

- be informed about how we process your personal data (which is why we have developed this Privacy Notice);



- have access to a copy of the personal information we collect and keep (known as a Subject Access Request);
- have inaccurate or incomplete personal data rectified;
- restrict processing of your personal data in certain circumstances, for example when you are contesting the accuracy or you object to the processing;
- object to processing for direct marketing or for the company's legitimate interests or performance of a task in the public interest, or for purposes of scientific/historical research and statistics
- have your personal data erased in certain circumstances where there is no compelling reason to continue processing it;
- data portability, to enable you to receive a copy of your personal data in a machine readable format, allowing you to move, copy or transfer personal data easily to another company;
- object to automated decision making that would affect you significantly, in certain circumstances;
- claim compensation for damages caused by a breach of the Data Protection Act (this can only be done via the Courts); and
- withdraw your consent for whg to use or share your personal information where you have previously given us your consent for this.

Questions and concerns

If you have any questions about the way in which we collect, process and store your information please speak to a colleague or the Data Protection Officer.

Right to lodge a complaint

If you have concerns about the way in which whg has handled your information, firstly contact the Data Protection Officer. If you remain unhappy, you have the right to speak to the Information Commissioner's Office (ICO). Go to <https://ico.org.uk/concerns/> for more details or phone 0303 123 1113.