

Privacy notice

This privacy notice tells you what to expect when we process personal information. It applies to information about customers and other service users. Orangutan is the Data Controller of all personal information that you provide to us.

Why do we collect and store personal information?

We need to collect, process and store personal information about you and other household members in order to fulfil our obligations under the Membership Benefits programme.

Information we may hold about you and how we use this

The information we hold on our records concerns our relationship with you. For example:

- we hold name, user name and password so you can log in
- we hold your contact details so we can communicate with you
- we record information about what awards you win at auction so we can send them to you
- we record the things you do and events you attend in order to allocate points to your account
- we will hold recordings of your telephone calls to us, as calls to our contact centre are recorded for training and monitoring purposes so we can ensure we're delivering a good service*
- we may carry out insight and satisfaction surveys to help us to monitor our performance, to keep our records up to date and to improve our services to our customers. This information is store in line with our retention policies.

*call recordings will be held in accordance with Orangutan's Information Security Policy.

This list is not exhaustive, as we hold records of most contacts we have with you, or about you, and we process this information so we can deliver services to you.

Our legal basis for processing your information for all of the above purposes are:

1. Contract: for a contract we have with you, or because you have asked us to take specific steps before entering into a contract
2. Legal Obligation: for us to comply with the law (not including contractual obligations)
3. Vital Interests: to protect someone's life
4. Legitimate interests: for our legitimate interests, or the legitimate interests of a third party, unless there is a good reason to protect your personal data which overrides those legitimate interests. Legitimate interests are those uses of personal data by a data controller that are deemed necessary (e.g. to provide the product or service) or reasonably to be expected by a data subject. A clear example of the latter is the basis of an existing customer relationship.
5. Consent: You have given clear consent for us to process your personal data for a specific purpose.

Generally the information we hold will have been provided by you (on application or enquiry forms or when we communicate with you), but we may also hold information provided by third parties where this is relevant to your housing circumstances eg from social workers and health professionals.

We will only ask for personal information that is appropriate to enable us to deliver our services. In some cases, you can refuse to provide your details if you deem a request to

be inappropriate. However, you should note that this may impact on our ability to provide some services to you if you refuse to provide information that stops us from doing so.

How we manage your personal information

Processing of your personal information will be undertaken in accordance with the principles of the General Data Protection Regulation 2018 (GDPR 2018). Access to personal information is restricted to authorised individuals on a strictly need to know basis. We will treat your personal information fairly and lawfully and we will ensure that information is:

- processed for limited purposes
- kept up-to-date, accurate, relevant and not excessive
- not kept longer than is necessary
- kept secure.

We are committed to keeping your personal details up to date, and we encourage you to inform us about any changes to ensure your details are accurate. To help us to ensure confidentiality of your personal information we may ask you security questions to confirm your identity when you call us or when we call you.

We will not discuss your personal information with anyone other than yourself, unless you have given us prior written authorisation to do so. Anyone calling on your behalf may also be subject to security questions to ensure we're taking adequate steps to protect your personal information.

We may apply notifications to your information (for example, in relation to your vulnerability or health status) to enable us to tailor and deliver services to you.

Membership Benefits only holds records during the period of our relationship and for a set period afterwards to allow us to meet our legal obligations, including resolving any follow up issues between us.

Sharing your personal information

Normally only our employees, and senior members of staff are able to see and process your personal information. However, there may be times when we need to share relevant information with third parties for the purposes as outlined in section two, or where we are legally required to do so. When sharing personal information, we will comply with all aspects of the GDPR 2018.

Sensitive information about health, sexual orientation, race and religion for example is subject to particularly stringent security and confidentiality measures.

Where necessary or required, we may share personal information:

- with our contractors to undertake some repairs, maintenance or improvement works
- with third party service providers, in connection with services performed on our behalf. For example if we use a mailing house to distribute our newsletters or to undertake surveys on our behalf
- our relationships with such providers are governed by our contracts with them which include strict data sharing and confidentiality protocols
- with community partners in connection with the delivery of coordinated local services
- with local authorities and government departments as necessary for administering justice, or for exercising statutory, governmental, or other public functions
- with police and other relevant authorities (eg Probation Service, Department of Work and Pensions, HM Revenues and Customs) in relation to the prevention or detection of crime and fraud; the apprehension or prosecution of offenders and the assessment or collection of tax or duty

- with other statutory organisations, eg social services and health authorities, as necessary for exercising statutory functions
- with the Regulator of Social Housing, to comply with our regulatory obligations
- this list is not exhaustive as there are other circumstances where we may also be required to share information, for example:
 - o to meet our legal obligations
 - o in connection with legal proceedings (or where we are instructed to do so by Court Order)
 - o to protect the vital interests of an individual (in a life or death situation)

International transfer of personal information

We do not envisage transferring any information about or relating to you to anyone who is located outside of the UNITED KINGDOM other than as indicated above and we have a commitment from our business partners and data processors that they too will honour this commitment.

Your rights

Right of Access

You have the right of access to personal information we hold about or concerning you. This can all be viewed, deleted and amended in the My Account section of the website.

Right of Rectification or Erasure

If you feel that any data that we hold about you is inaccurate you have the right to correct or rectify it. You also have a right to ask us to erase information about you where you can demonstrate that the data we hold is no longer needed by us, or you withdraw the consent upon which our processing is based, or you feel that we are unlawfully processing your data. Your right of rectification and erasure extends to anyone we have disclosed your personal information to and we will take all reasonable steps to inform those with whom we have shared your data about your request for erasure.

Right to Restriction of Processing

You have a right to request that we refrain from processing your data where you contest its accuracy, or the processing is unlawful and you have opposed its erasure, or where we don't need to hold your data anymore but you want us to in order to establish, exercise or defend any legal claims, or we are in dispute about the legality of our processing of your personal data.

Right to Portability

You have a right to receive any personal data that you have provided to us in order to transfer it onto another data controller where the processing is based on consent and is carried out by automated means. This is called a data portability request.

Right to Object

You have a right to object to our processing of your personal data where the basis of the processing is our legitimate interests including but not limited to direct marketing and profiling.

Changes to this privacy notice

This Privacy Notice is kept under regular review and was last updated in September 2019.

Cookies

We do not use cookies

Third party cookies

Some of the content on this website is provided by third party services who also use cookies, these include:

- Share/Like/Follow Buttons - if you are logged into Twitter, Facebook or Google Plus, then they may be setting cookies when you visit this site. You can control this by logging out of those services or seeing if they have options to turn this off
- Google Translate - if you use our translation functionality, Google will set cookies to monitor usage of their service
- YouTube - embedded YouTube videos will set cookies. Where possible we have used enhanced privacy options which means this only happens when you watch a video.

Google anti-spam reCAPTCHA

If you complete an online form on our website, Google will capture your IP address.

Further information

For more details on how to request your personal information and how and why we process your information, please contact us:

- by post: Data Protection Officer, Orangutan, 63 Somerset Road, Redhill RH1 6ND
- by phone: 08456 441122
- email: membership.benefits@orangutan.co.uk

The Information Commissioner (ICO) is also a source of information about your data protection rights. The ICO is an independent official body and one of their primary functions is to administer the provisions of the General Data Protection Regulations. You also have a right to lodge a complaint with the ICO about any aspect of how we are handling your data and can do so at:

- Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
- tel: 0303 123 1113
- web: www.ico.org.uk

Copyright Policy

We respect the intellectual property rights of others and expects users of the service to do the same. We will respond to notices of alleged copyright infringement that comply with applicable law and are properly provided to us. If you believe that your content has been copied in a way that constitutes copyright infringement, please contact us.

We reserve the right to remove content alleged to be infringing without prior notice and at our sole discretion. In appropriate circumstances, we will also terminate a user's account if the user is determined to be a repeat infringer.

The copyright of this service and its content is owned by, or licensed to us.

We grant to you a worldwide non-exclusive royalty free revocable license to view this service and to copy, store and print from this service for your own personal and non-commercial use.