

**Providing quality services that make a
real difference to people's lives**

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1. Summary

This Privacy Notice is a public document and applies to customers of Ring Stones Maintenance and Construction LLP to explain how the organisation collects and processes personal information to conduct normal business activities as a UK Construction Company Building social and other types of housing.

1. Property and grounds maintenance and repair.
2. We also provide additional optional services including:
3. Promoting, organising and assisting community events.
4. Offering opportunities to be involved (co-regulation).
5. Adaptations made to the properties we have developed.
6. Buying, Selling and maintenance of land and properties.

Our purpose is:

'Providing quality services that make a real difference to people's lives'

2. Who we are

Ring Stones is a values-led construction company who aspire to be unique in the market place, working collaboratively with stakeholders to deliver exceptional quality. By fulfilling our purpose we focus on developing people, places and communities for future generations.

Ring Stones Maintenance and Construction LLP is the Data Controller in its own right whose **Head Office is located at Centenary Court, Croft Street, Burnley Lancashire BB11 2ED Telephone 0300 321 8585 or 01282 686400.**

The company Data Protection Officer can be contacted at dataprotection@calico.org.uk or for general enquiries email: contact@calio.org.uk

Other Parts of 'The Calico Group'

The Calico Group

We are part of The Calico Group, which is made up of innovative businesses and charities, working together to make social profit, rather than financial profit, the driving force behind a wide range of high quality services. We do this by understanding the community's needs and harnessing the widest possible range of expertise; combining our growing range of complementary services to create innovative, new opportunities for the benefit of the community. The Group is made up of the following companies:

Calico Homes

They own and manage approximately 4,600 homes in Lancashire by providing accommodation for families and older people, plus supported housing and services for homeless people. They and aim to make a difference to the quality of life of individuals and the wider communities in which they work.

Delphi Medical Ltd

Delphi Medical is a leading independent provider of drug and alcohol treatment in the UK. They focus on ensuring excellent clinical and psychosocial provision as part of an integrated recovery pathway, which supports and facilitates patients to engage in genuine recovery. Their areas of expertise include Community Drug and Alcohol Treatment, Offender Health, Inpatient Detoxification Services, Clinical Systems and Training.

Acorn Recovery Projects

Acorn Recovery Projects is a registered charity set up to help individuals struggling with addiction and de-motivational issues to find and live a **Life worth Living**. By providing innovative recovery services, Acorn Recovery Projects enables individuals and their families to break free from drug, alcohol and other addictions. They do this by helping their clients find substance, emotional, social and lifelong recovery.

SafeNet Domestic Abuse Services

SafeNet protects victims and survivors of domestic abuse through the provision of safe refuge and support services, and promotes the prevention of further harm, through various initiatives including, working to build safe and healthy relations and promote equality.

Calico Enterprise

Calico Enterprise works with a host of organisations to deliver a range of services across the North West that: provide housing-related support; tackle worklessness; and give information and advice. Such services include: Calico Interiors; Constructing the Future; Calico Careers; and Floating Support contracts.

3. How we collect your information

Ring Stones Maintenance and Construction LLP collects information from you via a variety of sources, including when you apply for one of our properties or services, complete one of our forms or respond to a survey, also when you call, write, e-mail or meet with us. Additionally we may collect information when you use our social media sites and websites.

We take photographs at our properties, events and in our communities to use for record keeping, marketing and publicity. Photographs of individuals will only be used for marketing and publicity with the individual's consent.

We may also receive information about you from other companies within our Group in the form of a referral of our services or in the performance of our services.

4. What information we collect about you

The information we require from you, the tenant(s) or leaseholder(s), includes:

- Full name (and proof of your identity / photo ID).
- Date of birth.
- Contact details (phone number, home address, e-mail or correspondence address).
- Details of anyone authorised to act on your behalf, if applicable.
- Banking details.

If you do not provide the above information as required, we may not be able to provide all our services to you.

5. Withdrawing Consent

Where you have provided your consent to the collection, processing and transfer of your personal data, you may withdraw that consent at any time. This will not affect the lawfulness of data processing based on consent before it is withdrawn. When we obtained your information, we would have provided you with information on how to withdraw same. Alternatively, you can contact us on dataprotection@calico.org.uk if you wish to withdraw your consent.

6. How we process your information

The information we require from you is used to manage your tenancy, leasehold agreement or other contract between you and Calico Homes. Please read your contract carefully for specific details as 'performance of a contract' is usually the legal basis for processing your information and carrying out our activities.

The processing activities we conduct can be summarised as:

- Managing the repairs, maintenance and adaptations of our properties.
- Complying with relevant legislation and regulation.

Warning and vulnerability information may be processed as part of any function we legitimately perform for safeguarding of our workforce, including contractors.

Ring Stones Maintenance and Construction LLP conduct research and statistical analysis to help improve our business processes and the services offered to our customers, as well as to evaluate our performance against other benchmarks. When possible, statistical information is anonymised or pseudonymised.

Ring Stones Maintenance and Construction LLP conducts surveys regularly and periodically relating to our services in order to gauge satisfaction and make improvements based on feedback.

Ring Stones Maintenance and Construction LLP operate a range of information, communications systems and technologies for efficient operation of the business. Personal information is stored and managed within those systems which are maintained to achieve a high level of Confidentiality, Integrity and Availability (CIA) including following best practice cyber security standards.

We hold information in IT systems which may be copied for testing, backup, archiving and disaster recovery purposes. All data is held within the UK.

The table below lists the type of information we collect, the purpose of collecting them and the lawful basis for doing so:

What personal data we process	Our purpose for doing so	Our lawful basis
Personal contact details such as name, addresses, telephone numbers, email addresses, date of birth	Providing our services	Performance of a contract
Financial information such as bank account details, payment information	To take payment for the service we provide	Performance of a contract
Information regarding your marketing preferences	To deliver marketing materials such as our newsletter or make note of preferences.	Consent
Information about any complaints made by you or about you	To investigate and resolve any complaint you have raised	Legitimate interest of the organisation; Legal Obligation

7. Additional voluntary services

Ringstones Maintenance and Construction LLP conducts a number of additional voluntary services including organising community events, adapting the property you live in, and gathering information to improve our services.

For these voluntary services, where your personal information is needed and your consent is required, we will always explain the service and obtain your consent to proceed, usually by way of a sign up / consent form for that service.

8. Our Legitimate interests

Certain information is processed as it is deemed to be in our business or commercial interests. When we rely on any legitimate interest, we will ensure that we take a balanced approach and have appropriate safeguards in line with your expectations. If we rely on any legitimate interest, we will tell you what that is. Our legitimate interests include:

- Having appropriate security, for our offices and on our sites
- CCTV and identification photographs.
- Handling and investigating complaints.
- Keeping our records up to date.
- Recording threatening behaviour.
- Appending data from other sources.
- Official Communications.
- Keeping our records up to date, working out which of our products and services may interest you and telling you about them.
- Seeking your consent when we need it to contact you.

9. Property information

Much of the data we use relates to Calico Group properties, which includes their maintenance and repair. However, information such as the age of the kitchen, the results from an asbestos survey, planning to replace windows or a repair to a tap etc., we do not consider to be classed as personal information.

We are happy to assist you in any questions or queries you may have about the property you are living in and any work done to it.

As soon as your name, contact details or other personal information is used in conjunction with property information, such as to complete a property repair visit, then this is treated as personal information.

10. Automated decision making and profiling

Our services or activities are not based on any automated decision-making or profiling.

11. How we will communicate with you

Ring Stones Maintenance and Construction LLP need to communicate with its customers and this will usually be in writing or by telephone, but is more commonly becoming electronic and paperless. We are moving many of our services on-line as this is usually more convenient for you and more efficient for us.

We will only discuss or communicate our services to you with those named on the agreement or those authorised (temporarily or permanently) by you. Authorisation of a temporary person can be done verbally over the phone, however to nominate someone permanently you must contact us via email at: info@ringstones.co.uk.

12. Who we share data with

Ring Stones Maintenance and Construction LLP shares limited personal information with our contractors who carry out services on our behalf. Our contractors are required to comply with the law and our own Data Processing Agreements to ensure data is appropriately managed for specified purposes, including running our out-of-hours telephone service or to complete emergency, responsive or planned property repairs and improvements.

We may share your information with a language translation service if it is necessary to translate any information into or from a foreign language for you.

We may also share your data with companies in the same group of companies as us for the purpose of providing a service to you. These companies are listed above, under the Calico Group.

More information about who we share data with can be seen in the table below:

Who we share your personal data with	Our purpose for sharing it	Our justification (lawful basis) for sharing
People who provide services on our behalf, such as a managing agent, contractors carrying out repairs.	To deliver our services.	Performance of a contract.
People or agencies who provide services to you or who work with us to provide services to you such as utility companies.	To deliver our services.	Performance of a contract.
Our regulator or other bodies which look at how we provide services to you, our auditors & other people where we are legally required to provide information to them.	Legally required to share.	Legal obligation.
A language translation service.	Where necessary to translate any information into or from a foreign language for you.	Legitimate interest.
Solicitors, agents, mortgage brokers, financial advisors, court agents, surveyors and valuers.	Relating to a property sale.	Legal obligation, performance of a contract.
Companies in our Group such as Calico Homes, Hobstones, Delphi Medical Ltd, SafeNet Domestic Abuse Services, Acorn Recovery Projects, Calico Enterprise.	Providing a service to you.	Performance of a contract.

13. What we will not do

We will not send individuals unsolicited direct marketing material without their consent. However, we may conduct business to business marketing campaigns.

We will not sell individuals personal information on to third parties.

We will not pass on your personal information to unrelated third parties unless we are allowed or required to do so by law or we have your explicit permission to do so.

We will not transfer or store your personal information outside of Europe (the European Economic Area) outside of the control of the UK / European regulations.

14. How the organisation protects your data

We take the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed to unauthorised persons. Our controls ensure that data is accessed only by relevant employees of Ring Stones Maintenance and Construction LLP on a need to know basis, in the performance of their duties.

Where we engage third-parties to process personal data on our behalf, we will do so based on written instructions and a signed Data Processing Agreement is in place with the Processor. We will also ensure that the processor and all relevant employees of the processor involved in the processing activity are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

We operate a range of information, communications systems and technologies for efficient operation of the business. Personal information is stored and managed within those systems which are maintained to achieve a high level of Confidentiality, Integrity and Availability (CIA) including following best practice cyber security standards.

We hold information in IT systems which may be copied for testing, backup, archiving and disaster recovery purposes. All data is held within the UK.

15. How long we retain your data for

Information related to any service that we have provide to you will be kept for 7 years as legislated by HMRC for accounting purposes.

If you require more information on this, please contact us on info@ringstones.co.uk and we will provide you a copy.

16. Your rights, the right to complain and the ICO

Data protection regulations have conferred certain rights on you as the data subject regarding your personal data which we hold. These rights include:

- **Right to be informed** about the collection and use of your personal information. This is called 'privacy information'. We are required by data protection regulations to provide you with information regarding the purposes for processing your personal information, the retention period and who it will be shared with. This Privacy Policy serves that purpose.
- **Right of access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Right of rectification** – This enables you to have any incomplete or inaccurate information we hold about you to be corrected.
- **Right to erasure** – (also known as right to be forgotten) this enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Right to object** to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. In some cases, we may be able to continue processing if you can show

that you have a compelling reason for doing so. You also have the right to object where we are processing your personal information for direct marketing purposes.

- **Right to restriction** of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

In the first instance please contact our Customer Services team on 01282 686 400 or e-mail info@ringstones.co.uk to raise a complaint.

You have the right to complain about any matter relating to our service, including how we use your personal information. In the first instance please contact our Customer Services Team on 0800 169 2407 or 01282 686300 or email contact@calico.org.uk. If you are still not happy with our service, you may complain to the Housing Ombudsman Service at <http://housing-ombudsman.org.uk/>. If you wish to complain about our use of your personal information you may complain to the UK Information Commissioner's Office (ICO) at <http://ico.org.uk/> Our ICO registration number is **ZA052661**

17. Changes to our Privacy Notice

This privacy notice was last updated in November 2018 and subsequently will be updated to reflect changes either to the way in which we operate or changes to GDPR legislation. We will bring any significant changes to your attention but to make sure that you keep up to date, we suggest that you revisit this notice from time to time. The latest full version is always available from our website at www.ringstones.co.uk