

## **Privacy Policy – Cass and Claredale HRA Limited**

Cass and Claredale is committed to protecting your privacy. We treat your privacy seriously and this Privacy Policy explains how we use and share your personal information and how you can exercise your rights in relation to your personal information.

We are registered with the Information Commissioner's Office.

### **Who We Are**

Cass and Claredale HRA Limited is a charitable registered society under the Co-operative and Community Benefit Societies Act 2014

The Association's core purpose is to provide support for those studying at educational institutions in London, by providing affordable, secure accommodation.

### **When this Privacy Policy applies**

This Privacy Policy applies to personal information collected by Cass and Claredale and to any collection of personal information by third party companies, individuals, organisations or via other websites which the Cass and Claredale website might link to. Where third parties collect your personal information their own privacy policies will apply. We urge you to read these carefully.

### **What we mean by personal information**

When we refer to personal information in this Privacy Policy, we mean information that can identify you as an individual or is capable of doing so. By personal information we do not mean general, statistical, aggregated or anonymous information.

### **How we collect information about you**

You may provide personal information when communicating with us (for example, if you contact us).

We will collect information about your tastes and preferences both when you tell us what these are and by analysis of customer traffic, including by using cookies (as described below).

### **How we use your information**

We use your information for the following purposes:

- to process your application for a licence;
- to administer your accommodation agreement with us;
- to communicate with you prior to, during your stay and respond to your requests;
- to process payments
- to recover any unpaid sums due to us;
- to prevent and detect criminal activity, fraud and misuse of or damage to our property;

- to invite you to form part of our consumer panel or research groups;
- to personalise your visits to our website; and
- to help us develop the design and layout of our website to ensure it is as useful and enjoyable as possible.

### **Other information we may collect**

We may collect traffic data related to your use of and access to our services. Such data would include time spent online. We may use this information to understand and keep you informed about what is the best internet access package for you according to your use of the services.

We may provide aggregated statistics about our traffic patterns and other site information to third parties, but these statistics will not include any information that could personally identify you. We use this information along with your preferences to tailor content, services and offers for you.

### **How long do we keep your information**

The periods for which we keep your information will vary according to the purpose for which we use the information.

Unless there is a specific legal requirement to keep your information we will not keep it for longer than necessary for the purposes for which the data was collected or for which it is to be further processed. We have an internal data retention policy that details the duration for which we keep certain categories of data (we need to agree a Data Retention Policy).

### **Disclosing your information to third parties**

We may share your personal information with third parties in the following ways:

- where we have a legal or regulatory obligation to do so – this will include sharing your personal information with local councils for the provision of electoral roll services;
- where we use third party suppliers to provide services to us (for example, our Booking System and IT providers) and they need access to your personal information in order to deliver that service;
- where it is necessary to do so to protect or defend our legal rights or the legal rights of others;
- if you are housed by us and you fail to pay your rent we may contact our debt collection agent.
- We may also provide aggregated statistics about our sales, customers, traffic patterns and other site information to third parties, but these statistics will not include any information that could personally identify you.

### **How we protect your information**

When you review your account information or order services or products online, Cass and Claredale offers the use of a secure server. The secure server software encrypts the information that you input before it is transmitted to us. In addition, we have strict security procedures covering the storage and disclosure of your

information in order to prevent unauthorised access and to comply with statutory data protection requirements. This means that sometimes we may ask you for proof of identity before disclosing any personal information to you.

### **Cookies explained**

A cookie is a piece of information that is stored on your computer's hard drive by your web browser, or stored as a temporary object in your web browser for the time of that connection.

### **When we use cookies**

There are two types of cookies we use. The first is known as a 'session-based' cookie and is allocated to your computer only for the duration of your visit to our web site. The second type of cookie is known as a 'persistent' cookie. These cookies will remain on your computer for a period of time set for each cookie.

### **Updates to this Privacy Policy**

If we change the way in which we use or share your personal information we will update this Privacy Policy. We will notify you of any significant changes and where necessary we will obtain your consent before using your personal information for any new purpose.

### **Your rights in relation to your personal information**

You may request access to your personal information.

You also have the right to request that inaccurate information is updated or erased.

If you have consented to us sending you marketing communications you can request that we stop using your personal information for this purpose at any time.

All requests to exercise your rights in relation to your personal information should be sent by email to [dataprotection@cassandclaredale.co.uk](mailto:dataprotection@cassandclaredale.co.uk)

If you are unhappy about the way in which we have used your personal information please let us know by contacting [dataprotection@cassandclaredale.co.uk](mailto:dataprotection@cassandclaredale.co.uk) and we will try to resolve your complaint. If we are unable to resolve your complaint to your satisfaction you may lodge a complaint with the Information Commissioner's Office.

### **Contact details**

If you have any questions or complaints about how we use your personal information please contact us at [dataprotection@cassandclaredale.co.uk](mailto:dataprotection@cassandclaredale.co.uk)