



Gofal a Thrwsio Conwy a Sir Ddinbych
Conwy & Denbighshire Care & Repair

Privacy Policy

1. Background

Gofal a Thrwsio Conwy a Sir Ddinbych is a subsidiary company to Grwp Cynefin which is also registered with the Welsh Government and is registered under the Co-operative and Community Benefit Societies Act 2014 and a registered charity with the Charities Commission.

Gofal a Thrwsio Conwy a Sir Ddinbych retains its own Management Board with responsibility for the assets and liabilities of the agency but reports to the parent association Grwp Cynefin.

The principal activity of Gofal a Thrwsio Conwy a Sir Ddinbych is providing housing services to older people or vulnerable people to remain living independently and safely in their own homes. Gerddi Gwyrdd Home Improvement Gardening & Handypersons service is self-sustaining and enhances the Core service delivery in supporting older or vulnerable people within Conwy and Denbighshire.

Care & Repair helps older people to repair, adapt and maintain their homes so they can stay living independently in their own homes.

Our vision is a Wales where all older people can live independently in safe, warm, accessible homes

As the Older People's Housing Champion, we have delivered; evolved and innovated services that help older people live independently in their own homes for over 30 years. We work with a wide range of local and national partners including Welsh Government, Local Authorities, Health Boards, DWP, Grwp Cynefin.

Our service is person centered and tailored to each individual's needs providing advice and support on a range of issues.

Changes to this privacy policy

We may change this privacy policy from time to time by updating this page in order to reflect changes in the law and/or our privacy practices. We encourage you to check this privacy notice for changes whenever you visit our website.

C&D Care and Repair and our Data Protection Officer

We have a dedicated data protection officer ("DPO"). You can contact the DPO using the details below or by writing to the above address, marking it for the attention of the DPO.

2. What kinds of personal information about you do we process?

Personal information that we'll process in connection with all of our products and services, if relevant, includes:

- **Personal and contact details**, such as title, full name, contact details and contact details history
- **Your date of birth, gender and/or age**
- **Your nationality**, if needed for the product or service
- **Family members** if necessary
- **Records of your contact with us**, if you get in touch with us online using our online services.
- **Products and services** you hold with us, as well as have been interested in and have held and the associated payment methods used
- **Marketing to you and analyzing data**, including history of those communications, whether you open them or click on links, and information about products or services we think you may be interested in, and analyzing data to help target offers to you that we think are of interest or relevance to you.
- **Information about your health or if you are a vulnerable customer**
- **Information about your property**, such as location, value, number of rooms, property type and building work you've had done
- **Financial details about you**, such as your salary and details of other income, details of your savings, details of your expenditure, and payment method(s)
- **Details about all of your existing borrowings and loans**, if relevant
- **Information about your employment status**, if relevant
- **Information about your property occupier status**, such as whether you are a tenant, live with parents or are an owner occupier of the property where you live at the time of your application
- **Your residency and/or citizenship status**, if relevant, such as your nationality, your length of residency in the UK and/or whether you have the permanent right to reside in UK
- **Your marital status, family, lifestyle or social circumstances**, if relevant to the product (for example, the number of dependents you have or if you are a widow or widower)
- **information about any guarantor** which you provide in any application
- **Third party transactions**; such as where a person other than the account holder uses the service, information about that person and the transaction

3. What is the source of your personal information?

We'll collect personal information from the following general sources:

- From you directly, and any information from family members, associates or beneficiaries of products and services
- Information generated about you when you use our products and services
- From other sources such as Fraud Prevention Agencies, Credit Reference Agencies, other lenders, HMRC, DWP, publically available directories and information (for example, telephone

directory, social media, internet, news articles), debt recovery and/or tracing agents, other organisations to assist in prevention and detection of crime, police and law enforcement agencies

4. What do we use your personal data for?

We use your personal data, including any of the personal data listed in section 1 above, for the following purposes:

- Assessing an application for a product or service, including considering whether or not to offer you the product or service, the price, the risk of doing so, availability of payment method and the terms
- Managing products and services relating to that the product or service, or application for one
- Updating your records, tracing your whereabouts and recovering debt
- Managing any aspect of the product or service
- To make automated decisions on whether to offer you a product or service, or the price, payment method, risk or terms of it
- To perform and/or test the performance of, our products, services and internal processes
- To improve the operation of our business and that of our business partners
- To follow guidance and best practice under the change to rules of governmental and regulatory bodies
- For management and auditing of our business operations including accounting
- To monitor and to keep records of our communications with you and our staff (see below)
- To administer our good governance requirements and those of other members, such as internal reporting and compliance obligations or administration required for Annual General Meeting (“AGM”) processes
- For market research and analysis and developing statistics
- To comply with legal and regulatory obligations, requirements and guidance
- To provide insight and analysis of our clients both for ourselves and for the benefit of business partners either as part of providing products or services, helping us improve products or services, or to assess or improve the operating of our businesses
- To share information, as needed, with business partners (for example, financial services institutions, insurers), account beneficiaries, service providers or as part of providing and administering our products and services or operating our business

5. What are the legal grounds for our processing of your personal information (including when we share it with others)?

We rely on the following legal bases to use your personal data:

1. **Where it is needed to provide you with our products or services**, such as:
 - a) Assessing an application for a product or service you hold with us, including consider whether or not to offer you the product, the price, the payment methods available and the conditions to attach
 - b) Managing products and services you hold with us, or an application for one
 - c) Updating your records, tracing your whereabouts to contact you about your account and doing this for recovering debt (where appropriate)
 - d) Sharing your personal information with business partners and services providers when you apply for a product to help manage your product
 - e) All stages and activities relevant to managing the product or service including enquiry, application, administration and management of accounts, illustrations,
 - f) For some of our profiling and other automated decision making to decide whether to offer you a product and/or service, particular payment method and the price or terms of this

2. **Where it is in our legitimate interests to do so**, such as:
 - a) Managing your products and services relating to that, updating your records, tracing your whereabouts to contact you about your account and doing this for recovering debt (where appropriate)
 - b) To perform and/or test the performance of, our products, services and internal processes
 - c) To follow guidance and recommended best practice of government and regulatory bodies
 - d) For management and audit of our business operations including accounting
 - e) To carry out monitoring and to keep records of our communications with you and our staff (see below)
 - f) To administer our good governance requirements and those of other members of our Group, such as internal reporting and compliance obligations or administration required for AGM processes
 - g) For market research and analysis and developing statistics
 - h) For direct marketing communications and related profiling to help us to offer you relevant products and services, including deciding whether or not to offer you certain products and service.
 - i) Subject to the appropriate controls, to provide insight and analysis of our customers to business partners either as part of providing products or services, helping us improve products or services, or to assess or to improve the operating of our businesses
 - j) For some of our profiling and other automated decision making
 - k) Where we need to share your personal information with people or organisations in order to run our business or comply with any legal and/or regulatory obligations

3. To comply with our **legal obligations**
4. With your **consent or explicit consent**:
 - a) For some direct marketing communications
 - b) For some of our profiling and other automated decision making

c) For some of our processing of special categories of personal data such as about your health, if you are a vulnerable customer.

5. For a **public interest**, such as:

a) Processing of your special categories of personal data such as about your health, or if you are a vulnerable customer

6. When do we share your personal information with other organisations?

We may share information with the following third parties for the purposes listed above:

- Business partners (for example, financial services institutions, insurers), account beneficiaries, or others who are a part of providing your products and services or operating our business e.g. Grwp Cynefin
- Governmental and regulatory bodies such as HMRC, the Financial Conduct Authority, the Prudential Regulation Authority, the Ombudsman, the Information Commissioner's Office
- Other organisations and businesses who provide services to us such as Grwp Cynefin, debt recovery agencies, back up and server hosting providers, IT software and maintenance providers, document storage providers and suppliers of other back office functions
- Market research organisations who help us to develop and improve our products and services

7. How and when can you withdraw your consent?

Where we're relying upon your consent to process personal data, you can withdraw this at any time by contacting us using the details below.

8. What should you do if your personal information changes?

You should tell us so that we can update our records using the details in the Contact Us section of our website. We'll then update your records if we can.

9. Do you have to provide your personal information to us?

We're unable to provide you with our products or services if you do not provide certain information to us. In cases where providing some personal information is optional, we'll make this clear.

10. Do we do any monitoring involving processing of your personal information?

In this section monitoring means any: listening to, recording of, viewing of, intercepting of, or taking and keeping records (as the case may be) of calls, email, text messages, social media messages, in person (face to face) meetings and other communications.

We may monitor where permitted by law and we'll do this where the law requires it, or to comply with regulatory rules, to prevent or detect crime, in the interests of protecting the security of our communications systems and procedures and for quality control and staff training purposes. This information may be shared for the purposes described above.

11. For how long is your personal information retained by us?

Unless we explain otherwise to you, we'll hold your personal information based on the following criteria:

- For as long as we have reasonable business needs, such as managing our relationship with you and managing our operations
 - For as long as we provide goods and/or services to you and then for as long as someone could bring a claim against us; and/or
 - Retention periods in line with our retention policy requirements, legal and regulatory requirements or guidance.
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12. What are your rights under data protection laws?

Here is a list of the rights that all individuals have under data protection laws. They don't apply in all circumstances. If you wish to use any of them, we'll explain at that time if they are engaged or not. The right of data portability is only relevant from May 2018.

- The right to **be informed** about the processing of your personal information
- The right to have your personal information **corrected if it is inaccurate** and to have **incomplete personal information completed**
- The right to **object** to processing of your personal information
- The right to **restrict processing** of your personal information
- The right to **have your personal information erased** (the "right to be forgotten")
- The right to **request access** to your personal information and to obtain information about how we process it
- The right to **move, copy or transfer your personal information** ("data portability")
- Rights in relation to **automated decision making which has a legal effect or otherwise significantly affects you**

You have the right to complain to the Information Commissioner's Office which enforces data protection laws: <https://ico.org.uk/>. You can contact us using the details below.

13. Your right to object

You have the right to object to certain purposes for processing, in particular to data processed for direct marketing purposes and to data processed for certain reasons based on our legitimate interests. You can contact us here <https://careandrepair.org.uk/contact> to exercise these rights.

14. What are your marketing preferences and what do they mean?

We may use your home address, phone numbers, email address and social media or digital channels (for example, Facebook, Google and message facilities in other platforms) to contact you according to your marketing preferences. You can stop our marketing at any time by contacting us using the details below or by following the instructions in the communication.

Contact Us

If you have any questions about this privacy notice, or if you wish to exercise your rights or contact the DPO, you can contact us by going to <https://careandrepair.org.uk/contact> or alternatively, you can write to Conwy & Denbighshire Care and Repair, Unit 10-11 Ffordd Richard Davies, St Asaph Business Park, LL17 0LJ marking it for the attention of the DPO.