

## Privacy notice

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### **How your personal information is used by Leapfrog Lettings and Sales...**

Leapfrog Lettings Limited, trading as Leapfrog Lettings and Sales (Registered office; 4 Torver Way, Skelton, Cleveland. TS12 2WQ, Registration No: 8454446) is committed to protecting your personal information, being transparent about what data we hold and giving you control over how we use it. Leapfrog Lettings Limited is a controller of information for our trading name Leapfrog Lettings and Sales who is a processor of information.

### **1. Introduction**

At Leapfrog, your privacy is really important to us and you can find out more here about your privacy rights and how we gather, use and share your personal information; that includes the personal information we already hold about you now and further personal information we might collect about you, either from you or a third party. How we use your personal information will depend on our relationship with you, if you are customer, or the services we provide you with.

This Privacy Policy provides up to date information about how we use your personal information and will update any previous information we have given you.

This policy forms part of Leapfrog Lettings Limited obligation to be open and fair with all individuals whose personal data we process and to provide details around how we process such personal data and what we do with it.

Leapfrog is committed to safeguarding, protecting and processing the privacy of personal data and complying with the European General Data Protection Regulation (2016/679) and the UK Data Protection Bill 2017, and any future changes in data protection legislation with which Leapfrog will be required to comply when regularly reviewed and updated.

When selling, purchasing, renting or financing a property through our company, we process your personal data such as name, address, contact details, email address and passport amongst other things. Processing of this data implies collecting, storing, using or disclosing your personal data.

This Privacy Policy relates to the processing of personal data by Leapfrog Lettings Limited and any of its subsidiaries. Unless otherwise stated, all references to “we” or “our” shall imply all Leapfrog lines of business that process personal data.

None of the lists or examples provided in this Privacy Policy is intended to be exhaustive or fully representative of every individual.

### **Purpose of this Privacy Notice**

This Privacy Notice tells you what to expect when Leapfrog Lettings Limited (hereinafter called Leapfrog) processes personal information. It applies to information about applicants, residents and other service users. It tells you the purposes for which we may process your personal information, the legal basis and your rights with respect to processing. Processing includes any operation which is performed on your personal information including just keeping your information.

### **Why do we collect and store personal information?**

Leapfrog needs to collect process and store personal information about you and other household members. We do this for the fulfilment of tenancy agreements and to deliver efficient and effective services.

### **Information we may hold about you and how we use it**

The personal information we hold on our records concerns our relationship with you.

For example:

- We hold names and dates of birth, right to rent identification, anti-money laundering identification and information about your previous housing circumstances. This is to assess housing applications and help prevent tenancy fraud.
- We hold contact details for you so we can communicate with you about our services. When you provide information about household members we assume that you do so with their full knowledge and consent.
- We record information about your needs. You may need large print to make sure we understand any support needs or to improve our communications with you.
- We record information to enable us to provide housing management services. For example, reports of anti-social behaviour; and complaints.
- We record changes in your circumstances. For example, when your financial status changes. or information about housing options (e.g. if you have a medical need which means you need to move).
- We keep bank details and financial records about the amount of money you have paid us; any amount(s) outstanding and action taken to recover money you owe when renting a property.
- We may hold information about you to arrange or provide repairs and maintenance services.
- We record the findings of surveys and other research to help us improve our service to customers. The information you provide will be anonymous unless you agree that we can use your details.

This list is not exhaustive, as we hold records of most contact we have with you, or about you. We process this information so we can deliver services to you. Generally, the information we hold will have been provided by you (on application or enquiry forms or when we communicate with you). However, we may also hold information provided by third parties where this is relevant to your housing circumstances. An example would be for a Landlords or previous Landlords Reference. 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. You should note that this may impact 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**

We process your personal information in accordance with the principles of Data Protection Regulation 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 necessary
- Kept secure

Access to personal information is restricted to authorised individuals on a strictly need to know basis. We are committed to keeping your personal details up to date and ask that you inform us about any changes needed to ensure your details are accurate.

We may ask you security questions to confirm your identity when you call us. This is to help us to protect the confidentiality of your personal information. We will not discuss your personal information with anyone other than you, unless you have given us prior written authorisation to do so.

### **Legal basis for processing**

Our main legal basis for processing personal data is where it is necessary for the purposes of the legitimate interests pursued by Leapfrog or by a third party to process your information in order to manage your tenancy. We can do that so long as we do not interfere with your fundamental rights or freedoms.

The other reasons we can rely upon to process your personal information under Data Protection Act is as follows:

- With your consent (i.e. agreement) to us processing your personal information You can withdraw your consent at any time. This is explained further below in the section entitled 'Your rights';
- Where we are under a legal obligation or an obligation under a contract to process/disclose the information;

- Where we need to protect the vital interests (i.e. the health and safety) of you or another person

Special categories of personal data are defined within the regulation and covers racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, processing or genetic or biometric data for the purposes of identifying a natural person, data concerning health or data concerning a persons sexual orientation. The legal basis for processing these special categories of personal information is more limited. To lawfully process special categories of personal data, we must identify a lawful basis for the processing and meet a separate condition for the processing. The basis on which we can use these are:

- With your consent;
- Where we need to protect the vital interests (i.e. the health and safety) of you/another person;
- Where you have already made your personal information public;
- Where we or another person needs to bring or defend legal claims; and/or
- Substantial public interest grounds

### **Periods for which we will store your personal information**

We will only hold your records during the period of our relationship with you and for a set period afterwards to allow us to meet our legal obligations. This includes resolving any follow up issues between us. For example, if you live in one of our properties we will hold information about you for the duration of your tenancy. When your tenancy ends we will usually keep records about you for up to 7 years.

### **Sharing your personal information**

Normally, only Leapfrog staff will be able to see and process your personal information. However, there may be times when we will share relevant information with third parties. We do this for the purposes as outlined above or where we are legally required to do so. When sharing personal information, we will comply with all aspects of the Data Protection Act. Sensitive information about health, sexual life, race, religion and criminal activity, for example, is subject to particularly stringent security and confidentiality measures.

Where necessary or required, we may share information as follows:

- With our contractors, in order to undertake repairs, maintenance or improvement works
- With third party service providers, in connection with services performed on our behalf. Our relationships with such providers are governed by our contracts with them which include strict data sharing and confidentiality protocols.
- With other housing associations, trusts and landlords, in connection with tenancy references and associated enquiries.
- With Tenancy Deposit Providers, inline with the government backed schemes.
- With community partners in connection with the delivery of coordinated local services.

- With utility companies and their representatives, in connection with unpaid bills (gas, electricity & water).
- With credit reference agencies and debt collection agencies, in connection with some housing applications and in relation to any outstanding charges owed once residents leave their Leapfrog home.
- 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 (e.g. Probation Service, Department of Work & Pensions, HM Revenues & 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, e.g. social services and health authorities, as necessary for exercising statutory functions
- Our regulator UKALA and NLA.

This list is not exhaustive as there are other circumstances where we may also be required to share information, for example:

- To meet our legal obligations
- In connection with legal proceedings (or where we are instructed to do so by Court order)
- To protect the vital interests of an individual (in a life or death situation)

### Your Rights under the Data Protection Regulations

Data Protection law grants you certain rights (“information rights”) which provide:

Right of access and of date portability	You have the right of access to information we hold about or concerning you and/or to have it transferred to another data controller in some circumstances. If you would like to exercise this right you should contact us as outlined below.
Right of rectification or erasure	If you feel that any data that we hold about you is inaccurate you have the right to ask us 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. Your right of rectification and erasure extends to anyone we have disclosed your personal information to and we will/shall 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 need us to in order to establish, exercise or defend any legal claims, or we are in dispute about the legality of our processing your personal data. If you need us to correct any mistakes please email [insert email address]
Right to object	You have the 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. To object to our processing your personal data please email [insert email address]
Right to withdraw consent	You have the right to withdraw your consent for the processing of your personal data where the processing is based on consent. To withdraw consent please email [insert email address]

Right of complaint	You have a right to lodge a complaint about any aspect of how we are handling your data with the Information Commissioner's Office who can be contacted at <a href="http://www.ico.org.uk">www.ico.org.uk</a>
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### **Changes to this Privacy Notice**

We keep our privacy notice under regular review and will place any updates on our website; you will be notified of any major changes to this policy.

### **Identity and contact details of Controller**

Leapfrog Lettings Limited is the controller of personal information for the purposes of the Data Protection Act. The data controller is responsible for deciding how your information is used and ensuring it is private and secure.

The individual responsible for data protection compliance at Leapfrog is Sarah Hartley. They can be contacted at: [sarah@leapfroglettings.co.uk](mailto:sarah@leapfroglettings.co.uk) or at 4 Torver Way, Skelton, Cleveland. TS12 2WQ.

### **Further information**

For further information on how to request your personal information please contact Sarah Hartley.

The Information Commissioner (ICO) is also a source of further 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 Data Protection Act.

You have the right to complain to the ICO if you think we have breached the Data Protection Act. You can contact the ICO at:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

0303 123 1113 / <http://www.ico.org.uk/>

### **Contacting you**

We may contact you to deal with matters about your tenancy or application for housing. We will also contact you when we need to consult with you about any proposed changes to our service.

“We” “us” or “Leapfrog” means Leapfrog Lettings Limited (trading as Leapfrog Lettings and Sales). Company Registration number 8454446 of 4 Torver Way, Skelton, Cleveland. TS12 2WQ