



Your personal data and how we look after it

Introduction

Connexus takes the privacy and security of personal information very seriously. Personal information is any information that can identify you as an individual. We recognise that when you provide your information to us, you trust us to handle it appropriately, keep it secure, and only keep it for as long as necessary.

This includes ensuring that individuals have a clear and accessible route to raise concerns or complaints about how their personal data is handled.

We process personal data in accordance with applicable data protection legislation, including the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 (DPA 2018), the Data (Use and Access) Act 2025 (DUAA), and the Privacy and Electronic Communications Regulations (PECR), where applicable.

Connexus has appointed a Data Protection Officer (DPO). The DPO acts independently and has direct access to the highest levels within the organisation including the Chief Executive and Connexus' Board.

This statement tells you more about the information we collect, how we collect it, what we use it for, how we store it and who we share it with and why.

Who are we?

Connexus is the name used for the Connexus Group.

This means Connexus Homes Limited and all its subsidiaries, which currently includes:

- Floreat Living Limited
- Herefordshire Capital PLC
- Rise Partnership Developments Limited.

The registered office for Connexus Homes Limited and all subsidiaries is The Gateway, Auction Yard, Craven Arms, Shropshire, SY7 9BW.

How do we collect personal data?

We only collect personal data for specific purposes. This includes information about current and former tenants, current and former housing support service users, other service users, potential purchasers of our homes for sale, applicants for housing or for other services. This may also include information about other household members or next of kin.

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connexus-group.co.uk

hello@connexus-group.co.uk

[@weareconnexus](https://www.instagram.com/weareconnexus)

We collect this information in many ways, most commonly through paper and on-line application forms, other requests for our services, requests for information about our homes and services and through our ongoing relationship with you if you are a tenant, leaseholder or service user.

Typically, the type of information we collect and use includes:

- Name and address
- Date of birth
- Contact details (including telephone numbers and email address)
- Previous address details
- Income details
- Bank details
- Ethnicity
- Disability details
- Health/medical details
- Religion
- Gender
- NI Number
- Advocate details, if appropriate
- Next of Kin.

For housing applications, we may request and hold on file any references necessary to assess your application.

If relevant to your enquiry, service or accommodation, we may collect other information such as bank details, details about your physical or mental health, details of convictions, proceedings and criminal acts.

Where we collect and hold more sensitive personal data (including that described by the law as 'special category' information) we will always explain why we need it and who we may need to share it with. 'Special categories' data includes information about:

- race
- ethnic origin
- politics
- religion
- trade union membership
- genetics
- biometrics (where used for ID purposes)
- health
- sex life or
- sexual orientation.

We aim to minimise the holding and use of this type of personal information but given the service we provide there are times when we need to use it, for example, when providing housing/accommodation for someone who has disabilities or problems with substance abuse, when resolving neighbourhood disputes or when helping someone to access care and support services.

We collect information from applicants for employment, work placements and volunteers and from colleagues employed by Connexus. We also collect information from individuals who are on our boards and committees or who apply to join them.

If you apply to work at Connexus we will use the personal information you provide to process your application, produce and monitor recruitment statistics. Your information will not be shared or disclosed unless we have your consent to do so or we are required to by law. Personal information about unsuccessful applicants will be held for a period of time after the recruitment process has been completed.

Where there is a requirement for a Disclosure and Barring Service check we will comply with the law and your rights when carrying out those checks.

More detailed information about what we do with the personal information of successful applicants and existing Connexus colleagues is provided to them by our HR team.

We will only collect and use personal data that is adequate, relevant and limited to what is necessary for the purposes for which it is processed.

How we use your personal information?

We keep and use this information to allow us to:

- Provide appropriate homes;
- Manage tenancies;
- Provide repair and maintenance services;
- Receive rent and service charge payments;
- Offer help with debts and benefits;
- Provide support services;
- Provide homes for sale and provide information about these to those who have said they are interested in these;
- Resolve disputes and respond to anti-social behaviour;
- Promote safety and the quiet enjoyment of our neighbourhoods and communities;
- Seek the views of our customers about our homes and services to help us to make improvements to them;
- Provide information about homes and/or services that you request from us;
- Promote equal opportunities and fair treatment for all colleagues and customers;
- Provide employment and training advice and opportunities;
- Manage employment and colleague development;
- Complete reports and notifications as required by our regulators and the law.

There are some details which we may also ask you to provide which are not required for the main purposes of, for example, having a tenancy agreement or being employed by Connexus.

For example:

To improve our service to you – you can provide us with the following:

- Details of friends, relatives or a neighbour you trust to contact us on your behalf for example to arrange a repair or other service.

- A signed advocacy form for someone to act on your behalf when you are not available or able to discuss rent for example.
- Name and contact details to enable us to send information to you about other services that we provide that might be useful to you.
- Your name, photo, video or story for brochures, advertising or press releases for use by the media for which we need your consent.
- If you request additional services we will collect: -
 - Your name and contact details, which will be passed on to someone to contact you, either from Connexus or from another organisation.
 - If you have care and support requirements, we will hold details about you and/or your families' needs and pass them on to other organisations.
 - If you contact us about money problems, we will hold detailed information about your income and debts.
 - If you are involved with any of our projects we will ask for information relevant to these projects.
 - If you make a complaint about Connexus or our services we will keep the details to enable us to investigate the issue and to respond to you.

We will also record factual information whenever you contact us or use our services, as well as about other action we take, so we have a record of what happened or was agreed.

Lawful basis for processing

We only process your personal data where we have a lawful basis to do so. Depending on the circumstances, this may include:

- Performance of a contract (e.g. managing your tenancy)
- Compliance with a legal obligation
- Legitimate interests (e.g. improving services, managing risk)
- Consent (where you have given clear permission)
- Protection of vital interests
- Public task (where applicable to our functions)

Where appropriate, we will explain the specific lawful basis that applies to your personal data when it is collected. Further detail is available within our privacy information and internal policies, or on request if required.

Where we process special category data (such as health or disability information), we will ensure that a valid condition under Article 9 UK GDPR and Schedule 1 of the Data Protection Act 2018 is met.

Credit reference agencies/ Debt recovery agencies

We may use credit reference agencies in order to perform a credit check if you apply for a property. This information will only be viewed by authorised staff and will not be used for other purposes.

We may also use a debt recovery agency to contact you in relation to any accounts you may have had with us, in order to recover any debts that you may owe.

Violent or abusive behaviour

If you exhibit violent or abusive behaviour towards Connexus staff, contractors, other agencies or other residents we may place a marker on your record in order to protect colleagues, contractors or other agencies.

You have the right to request a review of this decision to record this information. We will make colleagues, contractors and partners aware that you are on the register.

Other 'markers'

Markers may be applied to your information (for example in relation to your vulnerability or health status) to enable us to tailor and deliver services to you for example if you need more time to get to the door we can let our contractors know.

Keeping your information up to date

We will do our best to keep personal data up to date, if your information changes, you can help us to do this by telling us about any changes.

If you provide information about your family/household or your 'associates', you should check that you have their consent for this. We will assume that you have provided the information with their knowledge and their consent to the collection and use of the information.

Photographic and CCTV recordings and telephone conversations

Some of our properties and offices have CCTV in public/communal areas to deter crime and anti-social behaviour and to promote public safety by helping to identify and prosecute criminal offenders.

Some phone calls to our offices are recorded for training and quality purposes; the recordings are retained for a period of time and may be used in connection with subsequent service enquiries or complaints.

These images and recordings are not shared outside of Connexus with third parties, except in exceptional circumstances, for example, relating to law enforcement.

We will always ask for your consent if we wish to use photos or video footage of you for brochures, advertising or press releases for use by the media.

Security of your personal information

Connexus takes security of your data seriously and we will take appropriate technical and organisational precautions to prevent unauthorised access, loss, misuse or alteration of your personal information.

Our network is secured with Firewall permission and anti-virus software which is continually updated. Our standard security involves password access, and passwords have to be changed regularly, files and applications are only shared with colleagues who have the correct rights/permissions to gain access to the information. We use secure means to transfer information when we need to share it with others (e.g. secure email or encryption).

We periodically use independent companies to test these measures. Old equipment is disposed of securely and environmentally, which means not only is all the data removed from the devices, but they are also then broken down and recycled.

We take appropriate steps to keep paper records secure in our offices.

We will only retain personal data for as long as necessary for the purposes for which it was collected, in line with our retention schedule and legal obligations. At the end of the retention period all data and documents are securely destroyed. A copy of this schedule is available on our website or from our Data Protection Officer.

Sharing data

Personal information will normally only be used by Connexus, but there may be times when we disclose your details to others. In most cases this will be basic contact details to enable us to carry out our duties as a landlord. Examples include:

- Contractors e.g. to undertake repairs or improvements to your home.
- Our contractors who handle the out-of-hour service calls for us.
- Banks, so that secure payments can be carried out.
- Companies that assist us in mailing out newsletters and rent statements.
- Additional colleague resources, such as consultants or agency staff.
- Our professional advisors and auditors.
- External assistance where you have consented to a referral, for example to do with money problems or care and support.
- Collecting feedback is a legitimate interest in improving our services.

In some circumstances Connexus may disclose information to authorised third parties without your consent. Such circumstances include:

- Where there is clear evidence of fraud;
- To comply with the law;
- In connection with legal proceedings;
- Where it is essential to enable Connexus to carry out its duties;
- Where the health and safety of an individual, including any children, would be at risk by not disclosing the information;
- Where the data is anonymised and to be used for statistics/research.

We do not give anyone else access to your information in return for payment or for their marketing or commercial purposes.

Where we use third parties to process personal data on our behalf, we ensure appropriate contractual terms are in place in accordance with Article 28 UK GDPR.

Any transfer of data by Connexus will be in full compliance with the UK GDPR, DPA 2018 and DUAA and where data is shared it will only be with compliant organisations.

Connexus does not routinely transfer personal data outside of the UK. Where this is necessary, we will ensure that appropriate safeguards are in place in accordance with UK data protection

law, such as UK adequacy regulations or the UK International Data Transfer Agreement (IDTA) or Addendum to EU Standard Contractual Clauses.

Any sharing of personal data will be carried out in accordance with applicable data protection legislation, including UK GDPR, the DPA 2018 and the DUAA.

Where we share data with third parties, we will ensure appropriate safeguards are in place, including contracts and data sharing agreements where required.

Your rights

Under UK-GDPR, DPA 2018 and DUAA, you have rights including:

- The right of access (to request a copy of your personal data)
- The right to rectification
- The right to erasure (in certain circumstances)
- The right to restrict processing
- The right to object to processing
- The right to data portability (in certain circumstances)
- Rights in relation to automated decision-making and profiling
- The right to lodge a complaint

Connexus does not currently carry out solely automated decision-making that has legal or similarly significant effects on individuals.

When responding to requests, we will carry out reasonable and proportionate searches in line with our legal obligations.

We are committed to meeting enhanced transparency and accountability requirements under the DUAA, including ensuring individuals can easily understand how their data is used and accessed.

Consent

Where Connexus is using your information because you have provided your consent to that use, you are entitled to withdraw your consent at any time. Where we rely on consent, this will be freely given, specific, informed and unambiguous. The lawfulness of Connexus' use of your information before consent was withdrawn is not affected.

More Information

You can get more information about your rights from the Information Commissioner's Office (ICO) at:

Wycliffe House

Water Lane

Wilmslow, Cheshire, SK9 5AF

Tel: 0303 123 1113

Website: <https://ico.org.uk>

You may request a copy of information held about you by Connexus (we call these data subject access requests). There are certain rules and exceptions to these rights; if you wish to know more about these rights, please ask.

You are not required to pay a fee for exercising your rights (unless a request is manifestly unfounded or excessive). We aim to respond within one month, although this may be extended where permitted by law or where further information is required to process your request.

Complaints

You have the right to raise a complaint with Connexus if you believe we have mishandled your personal data. We have a clear process in place to receive, investigate and respond to data protection complaints.

Complaints can be made via email, telephone or in writing, and will be handled promptly and fairly in line with our complaints policy.

We encourage you to contact us in the first instance so that we can investigate and resolve your concerns directly.

You can contact our Data Protection Officer at connexus.GDPR@connexus-group.co.uk or hello@connexus-group.co.uk.

You also have the right to complain to the Information Commissioner's Office (ICO). Their contact details are above.