

# open

Privacy Policy | 2020

This privacy notice is to let you know how companies within the heylo group will look after your personal information. This includes what you tell us about yourself, what we learn by having you as a customer, and the choices you give us about what marketing you want us to send you.

## Who We Are

The heylo housing group is made up of several different legal entities. We will tell you which one you will have a relationship with when we enter into contracts with you or receive a service from us.

You can find out more about us at [www.heylohousing.com](http://www.heylohousing.com).

If you have any questions, or want more details about how we use your personal information, then please email Graeme Moran, MD, Portfolio & Public Sector at [helpdesk@heylohousing.com](mailto:helpdesk@heylohousing.com).

This privacy notice explains our approach to data protection. In this privacy notice, “we”, “us”, “our” and “heylo group” means any of the heylo group entities (including Heylo Housing Group Limited, HH No.1 Limited, HH No.2 Limited, Heylo Housing Registered Provider Limited, Heylo Housing Secured Bond plc, HH No.3 Limited, HH No.5 Limited and ResiManagement Limited).

## How the Law Protects You

Your privacy is protected by law. Data Protection law says that we are allowed to use personal information only if we have a proper reason to do so. This includes sharing it outside the heylo group.

The law says we must have one or more of these reasons:

- To fulfil a contract we have with you, or
- When it is our legal duty, or
- When it is in our legitimate interest, or
- When you consent to it

A legitimate interest is when we have a business or commercial reason to use your information. If we rely on our legitimate interest, we will tell you what that is.



## How We Use Your Records

Here is a list of all the ways that we may use your personal information, and which of the reasons we rely on to do so. This is also where we tell you what our legitimate interests are.

What we use your personal information for	Our reasons	Our legitimate interests
Provide home ownership products.	<ul style="list-style-type: none"><li>• Our legitimate interests</li><li>• Fulfilling contracts</li></ul>	<ul style="list-style-type: none"><li>• Being efficient about how we fulfil our contractual obligations.</li><li>• Complying with regulations that apply to us.</li></ul>
Make housing assessments and allocations.	<ul style="list-style-type: none"><li>• Our legitimate interests</li><li>• Fulfilling contracts</li></ul>	<ul style="list-style-type: none"><li>• Being efficient about how we fulfil our contractual obligations.</li><li>• Complying with regulations that apply to us.</li></ul>
Manage leases including collecting rent, service charges and other changes such as Ground Rent.	<ul style="list-style-type: none"><li>• Our legitimate interests</li><li>• Fulfilling contracts</li></ul>	<ul style="list-style-type: none"><li>• Being efficient about how we fulfil our contractual obligations.</li><li>• Complying with regulations that apply to us.</li></ul>
Provide any relevant repairs and maintenance services.	<ul style="list-style-type: none"><li>• Our legitimate interests</li><li>• Fulfilling contracts</li></ul>	<ul style="list-style-type: none"><li>• Being efficient about how we fulfil our contractual obligations.</li><li>• Complying with regulations that apply to us.</li></ul>
Keep in touch with our customers, understand your needs and preferences and invite you to events.	<ul style="list-style-type: none"><li>• Our legitimate interests</li><li>• Your consent</li></ul>	<ul style="list-style-type: none"><li>• Being efficient about how we fulfil our contractual obligations.</li><li>• Seeking your consent when we need it to contact you.</li></ul>

What we use your personal information for	Our reasons	Our legitimate interests
Prevent and detect fraud and money laundering. To obey laws and regulations that apply to us.	<ul style="list-style-type: none"> <li>Our legitimate interests</li> <li>Fulfilling contracts</li> <li>Our legal duty</li> </ul>	<ul style="list-style-type: none"> <li>Developing and improving how we deal with financial crime, as well as doing our legal duties in this respect. Complying with regulations that apply to us.</li> <li>Being efficient about how we fulfil our legal and contractual duties.</li> </ul>
Promote safety and the quiet enjoyment of the home, neighbourhood and community.	<ul style="list-style-type: none"> <li>Our legitimate interests</li> <li>Fulfilling contracts</li> </ul>	<ul style="list-style-type: none"> <li>Being efficient about how we fulfil our contractual obligations.</li> <li>Complying with regulations that apply to us.</li> </ul>
Engage with customers and make improvements to our products and services.	<ul style="list-style-type: none"> <li>Our legitimate interests</li> <li>Your consent</li> </ul>	<ul style="list-style-type: none"> <li>Being efficient about how we fulfil our contractual obligations.</li> <li>Seeking your consent when we need it to contact you.</li> </ul>
Promote equal opportunities and fair treatment for all our customers.	<ul style="list-style-type: none"> <li>Our legal duty</li> </ul>	
Provide information (e.g. about products and services) you request from us.	<ul style="list-style-type: none"> <li>Our legitimate interests</li> <li>Your consent</li> </ul>	<ul style="list-style-type: none"> <li>Being efficient about how we fulfil our contractual obligations.</li> <li>Seeking your consent when we need it to contact you.</li> </ul>
Develop new products and services.		
Meet our legal obligations, including those owed to our funders or regulators.	<ul style="list-style-type: none"> <li>Our legitimate interests</li> <li>Fulfilling contracts</li> </ul>	<ul style="list-style-type: none"> <li>Being efficient about how we fulfil our contractual obligations.</li> <li>Complying with regulations that apply to us.</li> </ul>

## Personal Information We Collect

We collect various types of information about you as follows:

<b>Contact Information</b>	Your name, phone numbers that you can be contacted on, your email address, current residential address and any previous residential address in the last 3 years and how to contact you.
<b>Financial Information</b>	Your financial position, status and history.
<b>Identity Information</b>	Details about you are stored in documents in different formats, or copies of them. This could include things like your passport, your driver's licence, your birth certificate, your date of birth, your utility bills or banking statements or other documents that you provide to us to verify your identity.
<b>Banking Information</b>	Your bank account details (bank account number, sort code, name and address).
<b>Mortgage Information</b>	Details about your current or expected mortgage. This could include information on your mortgage provider, the amount of your mortgage, your mortgage broker, the address of the property subject to a mortgage and any account numbers.
<b>Contractual Information</b>	Details about any products or services we provide to you.

## Personal Information We Collect (continued)

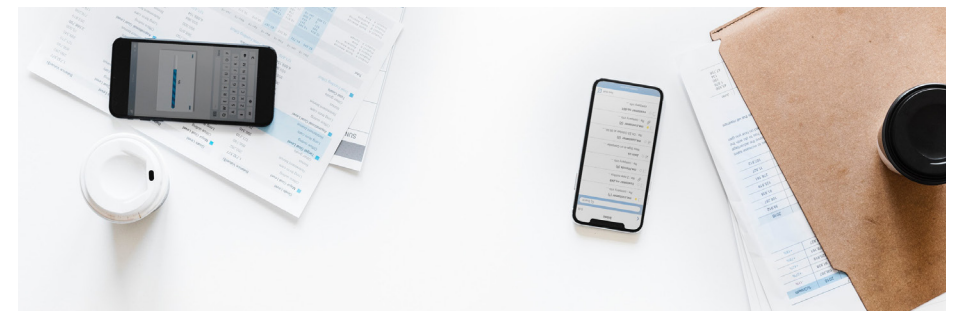
<b>Transactional Information</b>	Details about payment to and from you in relation to any relationship or contract you have with us.
<b>Communication Information</b>	Any information we have that we have obtained about you from letters, emails and conversations between us.
<b>Consent Information</b>	Any permissions, consents or preferences that you give us. This includes how you want to be contacted and whether you want to be included in marketing information that we may send to you.
<b>Employment Information</b>	Details of your employment status including whether you are employed or self-employed and details of your employer.
<b>Product Information</b>	Details of any of our housing products you may be interested in, including where you may want to live, when you would like to move home and the types of homes you may want to move to.
<b>Property Information</b>	Details of any previous properties occupied by you, details of any previous or current landlords.

## How We Collect Personal Information

We may collect information about you from other companies in the heylo group and in a variety of ways including:

- When you apply for our products and complete forms and contracts
- When you talk to us on the phone
- When you use our website
- In emails and letters, either from you or from third parties – for example, if you write to us or if someone else writes to us on your behalf or in relation to your occupation of a property
- In customer surveys
- Payment data
- Data from third parties we work with including:
  - Companies that introduce you to us
  - Financial advisers
  - Credit reference agencies
  - Fraud prevention agencies
  - Agents or agencies or contractors working on our behalf
  - Government and organisations performing services on behalf of Government

It is important that you notify us of any changes to your personal information as soon as possible so that we can contact you easily. You should also notify us if any of the information we hold is inaccurate. Please let us know by contacting us at [helpdesk@heylohousing.com](mailto:helpdesk@heylohousing.com) or write to Graeme Moran, MD, Portfolio & Public Sector at heylo housing, Level 6, Design Centre East, Chelsea Harbour, London, SW10 0XF. If you do, we will take reasonable steps to check its accuracy and correct it.





## Who We Share Your Personal Information With

We may share your personal information with companies within the heylo group and the following organisations:

- Agents, contractors and advisers who we use to help run our relationship with you and collect what you owe and identify any changes that we can make to how we run our business
- HM Revenue & Customs, regulators and other authorities
- Utility suppliers
- Credit reference agencies
- Fraud prevention agencies
- Any party linked with you
- Companies we have a joint venture or agreement to co-operate with
- Organisations that introduce you to us
- Companies that we introduce you to
- Market researchers
- Independent Financial Advisors
- Companies you ask us to share your data with.

We may also share your personal information if:

- We are required to do so by law
- In connection with legal proceedings or potential legal proceedings
- If required to do so by any court, or any regulatory, compliance, governmental or law enforcement agency

We may also share your personal information if the make-up of the heylo group changes in the future:

- We may choose to sell, transfer, or merge parts of our business, or our assets. Or we may seek to acquire other businesses or merge with them.
- During any such process, we may share your data with other parties. We'll only do this if they agree to keep your data safe and private.
- If the change to us happens, then other parties may use your data in the same way as set out in this notice.

## How We Use Your Information to Make Automated Decisions

We sometimes use systems to make automated decisions based on personal information we have – or are allowed to collect from others – about you. This helps us to make sure our decisions are quick, fair, efficient and correct, based on what we know. These automated decisions can affect the products, services or features we may offer you now or in the future, or the price that we charge you for them.

Here are the types of automated decision we make:

### Entering into contracts

When you apply to enter into contracts with us, we check that the product or service is relevant for you, based on what we know.

We also check that you meet the conditions needed to enter into the contract. This may include checking age, residency, nationality or financial position.

### Your rights

As a person you have rights over automated decisions.

- You can ask that we do not make our decision based on the automated score alone.
- You can object to an automated decision, and ask that a person reviews it.
- If you want to know more about these rights, please contact us.





## Credit Reference Agencies

We carry out credit and identity checks when you apply for a product or services for you. We may use Credit Reference Agencies ("CRAs") to help us with this.

If you use our services or enter into contracts with us, from time to time we may also search information that the CRAs have, to help us manage our relationship with you. We will share your personal information with CRAs and they will give us information about you. The data we exchange can include:

- Name, address and date of birth
- Credit application
- Details of any shared credit
- Financial situation and history
- Public information, from sources such as the electoral register and Companies House.

We'll use this data to:

- Make sure what you've told us is true and correct
- Help detect and prevent financial crime
- Manage your contractual relationship with us
- Trace and recover debts

We will go on sharing your personal information with CRAs for as long as you are a customer. This will include details about your settled amounts that were due to us and any amounts not fully paid on time. The CRAs may give this information to other organisations that want to check credit status. We will also tell the CRAs when you settle your outstanding contractual obligations with us.

When we ask CRAs about you, they will note it on your credit file. This is called a credit search. Whilst you will see the credit search on a credit report prepared for you, other organisations (including lenders) will not see this credit search on any report prepared for their own purposes.

If you apply for a product with someone else, we will link your records with theirs. We will do the same if you tell us you have a spouse, partner or civil partner.

You should tell them about this before you apply for a product or service. It is important that they know your records will be linked together, and that credit searches may be made on them.

CRAs will also link your records together. These links will stay on your files unless one of you asks the CRAs to break the link. You will normally need to give proof that you no longer have a financial link with each other.

You can find out more about the CRAs on their websites, in the Credit Reference Agency Information Notice. This includes details about:

- Who they are
- Their role as fraud prevention agencies
- The data they hold and how they use it
- How they share personal information
- How long they can keep data
- Your data protection rights.

Here are links to the information notice for each of the four main Credit Reference Agencies:

- Callcredit
- Experian
- Equifax
- TransUnion

## Fraud Prevention Agencies (FPAS)

We may need to confirm your identity before we provide products or services to you. Once you have become a customer of ours, we will also share your personal information as needed to help detect fraud and money-laundering risks. We use Fraud Prevention Agencies to help us with this.

## Data Transfers Out of the EEA

FPAs may send personal information to countries outside the European Economic Area ("EEA"). When they do, there will be a contract in place to make sure the recipient protects the data to the same standard as the EEA. This may include following international frameworks for making data sharing secure.

## Ending Data Outside of the EEA

Keeping information about you secure is very important to us so we store and process your personal information in accordance with the high standards required under data protection legislation.

From time to time and for operational reasons the personal information we collect from you may be transferred to and stored in countries outside of the European Economic Area ("EEA").

Your information may also be processed by some of our service providers which operate outside the EEA. Different countries have different data protection and security laws and some of these do not offer the same level of protection as you enjoy under UK data protection legislation.

However, when we appoint our service providers to help us provide products and services to you (which may include some based in the USA), we take care to ensure that they have appropriate security measures in place.

## If You Choose Not to Give Personal Information

We may need to collect personal information by law, or under the terms of a contract we have with you.

If you choose not to give us this personal information, it may delay or prevent us from meeting our obligations. It may also mean that we cannot perform services needed to run your accounts or policies. It could mean that we cancel a product, contract or service you have with us.

Any data collection that is optional would be made clear at the point of collection.

## Marketing

We may use your personal information to tell you about relevant products and offers. The personal information we have for you is made up of what you tell us, and data we collect when you use our services or website, or from third parties we work with.

We study this to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

We can only use your personal information to send you marketing messages if we have either your consent or a 'legitimate interest'. That is when we have a business or commercial reason to use your information. It must not unfairly go against what is right and best for you.

You can ask us to stop sending you marketing messages by contacting us at any time.

Whatever you choose, you'll still receive important information such as changes to your existing contracts and services.

We may ask you to confirm or update your choices, if you take out any new products, contracts or services with us in future. We will also ask you to do this if there are changes in the law, regulation, or the structure of our business.

If you change your mind you can update your choices at any time by contacting us.



## Your Rights

You already have certain rights under existing data protection legislation, including a right to request a copy of the personal information we hold on you, if you request it in writing. From 25 May 2018 you will have the following rights:

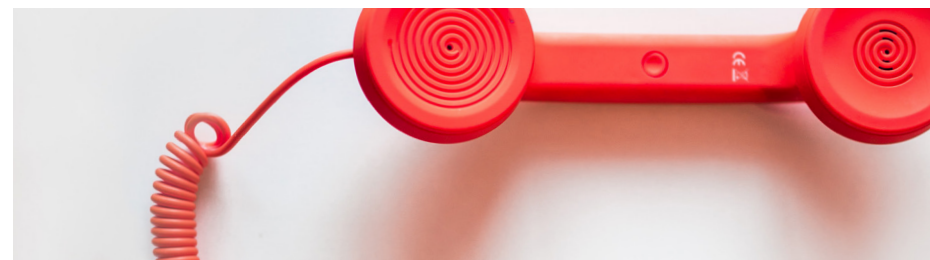
- Right to correct: the right to have your personal information rectified if it is inaccurate or incomplete
- Right to erase: the right to request that we delete or remove your personal information from our systems
- Right to restrict our use of your information: the right to 'block' us from using your personal information or limit the way in which we can use it
- Right to data portability: the right to request that we move, copy or transfer your personal information
- Right to object: the right to object to our use of your personal information including where we use it for our legitimate interests, or where we use your personal information to carry out profiling to inform our market research and development of our business.

If you raise an objection we will stop processing your personal information unless very exceptional circumstances apply, in which case we will let you know why we're continuing to process your personal information

We will use reasonable efforts consistent with our legal duty to provide you with your rights in accordance with data protection legislation. There may be legal or other official reasons why we need to keep or use your data. But please tell us if you think that we should not be using it.

To make enquiries, exercise any of your rights set out in this Privacy Policy and/or make a complaint please contact [helpdesk@heylohousing.com](mailto:helpdesk@heylohousing.com) or write to Graeme Moran, MD, Portfolio & Public Sector at heylo housing, Level 6, Design Centre East, Chelsea Harbour, London, SW10 0XF.

If you're not satisfied with the way any complaint you make in relation to your personal information is handled by us then you may be able to refer your complaint to the relevant data protection regulator. In the UK, this is the Information Commissioner's Office. Find out on their website how to report a concern: <https://ico.org.uk/>





## How to Withdraw Your Consent

You can withdraw any consent you have given us at any time. Please contact us at [helpdesk@heylohousing.com](mailto:helpdesk@heylohousing.com) or write to Graeme Moran, MD, Portfolio & Public Sector at heylo housing, Level 6, Design Centre East, Chelsea Harbour, London, SW10 0XF if you want to do so.

If you withdraw your consent, we may not be able to provide certain products or services to you.

You have the right to ask us in writing not to process your personal information if it is causing or likely to cause substantial damage or distress or is to be used for direct marketing.

There may also be other specific circumstances where you may wish for us to stop processing your data, such as if you agreed to take part in a survey or signed up to an optional service. However, we need to maintain certain records to enable us to provide you with the services you receive.

## How to Get a Copy of Your Personal Information

- You can access your personal information. The right to access the information is an individual one. This means that we cannot process joint requests – they are to be treated separately.
- You can write to us to make your request and, if necessary, we may ask you for further information to help us locate the information you are requesting. Please write to Graeme Moran, MD, Portfolio & Public Sector at heylo housing, Level 6, Design Centre East, Chelsea Harbour, London, SW10 0XF.
- We will require proof of your identity and address – we will let you know this when we receive your request.
- When we receive your request and have confirmed your identity to our satisfaction, we shall respond and provide your information within one month.

## Changes

This privacy notice will be updated to reflect changes either to the way in which we operate or changes to data protection 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. Changes posted on this page will become effective as soon as they are posted.

## Contacting Us

If you have any data protection queries relating to our use of your personal information or any related data protection queries, please contact: [helpdesk@heylohousing.com](mailto:helpdesk@heylohousing.com) or write to us at:

Graeme Moran, MD, Portfolio & Public Sector at heylo housing,  
Level 6,  
Design Centre East,  
Chelsea Harbour,  
London,  
SW10 0XF





heylo  
[www.heylohousing.com](http://www.heylohousing.com)

Correct at time of printing - 1st July 2020