



# Data Privacy Notice - Tenants

Chester House is managed by the Guy Chester Centre (GCC). The Guy Chester Centre is the trading name of the Trustees of the North Bank Estate.

## 1. Introduction

This Privacy Notice (“Notice”) describes how GCC collects and uses your Personal Data in accordance with the EU General Data Protection Regulation (“GDPR”).

This Notice tells you what Personal Data GCC collects, why we need it, how we use it and what protections are in place to keep it secure.

Key Terms:

- “GCC” “we” “us” and “our” mean GCC.
- “GCC Personnel” means GCC’s prospective, present and past directors, employees, consultants and agency staff, and people connected to such persons.
- “Personal Data” means information about individuals (including you), and from which such individuals could be identified.
- “You” means individuals whose Personal Data we process. “You” does not include GCC Personnel.

## 2. Data Controller & Data Protection Manager

GCC is the Data Controller in relation to your Personal Data and is committed to protecting the privacy rights of individuals, including your rights.

GCC has appointed a Data Protection Manager (“DPM”) who is responsible for overseeing GCC’s compliance with the GDPR and any other applicable data protection legislation and regulation.

The DPM can be contacted at [office@chesterhouse.org.uk](mailto:office@chesterhouse.org.uk)

## 3. How does GCC obtain your Personal Data?

In most circumstances, we obtain your Personal Data from you directly but, occasionally, we may be given your Personal Data from a third-party source, such as your guarantor, next of kin, other organisations/persons with whom you have dealings, government agencies, information or service providers and publicly available records.

## 4. What Personal Data does GCC collect from and about you?

We collect and use different types of Personal Data about you, which will vary in type and detail depending on the circumstances and purpose of processing. Please consider the following illustrative and non-exhaustive examples:

- *Personal Data about you:* name, address, date of birth, nationality, gender, course and place of study, job title, place of work, dietary requirements;
- *Personal Data to contact you:* name, address, telephone, and e-mail addresses;
- *Personal Data which may identify you:* photographs and video, passport details, electronic signatures;
- *Personal Data to process any payment we might need to make to you:* bank account details;
- *Personal Data to allow you to access our buildings:* CCTV images.

## 5. Why do we need to collect and use your Personal Data?

We need to collect and use your Personal Data for a number of reasons, the primary purpose being to provide you with accommodation and which may involve the use of your Personal Data in the following (non-exhaustive) ways:

- to contact you regarding your accommodation;
- to receive payment for accommodation and other costs associated with the accommodation provided

We may also process your Personal Data for effective business management purposes which may involve the use of your Personal Data in the following (non-exhaustive) ways:

- to engage and contact suppliers;
- to carry out internal reviews, investigations, audits;
- to conduct business reporting and analytics;
- to help measure performance and improve our services;
- for regulatory and legislative compliance and related reporting; and
- for the prevention and detection of crime.

## 6. What is GCC's legal basis for processing your Personal Data?

Under the GDPR, GCC must identify a lawful basis for processing your Personal Data which may vary according to the type of Personal Data processed and the individual to whom it relates.

### 6.1. Performance of your accommodation agreement with you (where applicable):

- GCC is entitled to process the Personal Data it requires to fulfil its obligations under its accommodation agreement with you.

### 6.2. Legitimate interests of GCC or a third-party:

- GCC processes some of your Personal Data on the basis that it is in its legitimate interests and/or the legitimate interests of a third-party to do so. This will primarily concern the processing of Personal Data that is necessary to provide you with meals based on any dietary requirements. GCC's legitimate business interest in such instances is to ensure you can be provided with the meals included as part of your accommodation.
- GCC may also process your Personal Data on the basis that it is necessary for its legitimate business interests in the effective management and running of GCC which may include, but is not limited to: engaging suppliers and supplier personnel; ensuring that its systems and premises are secure and running efficiently; for regulatory and legislative compliance, and related auditing and reporting; for insurance purposes; and to facilitate, make and receive payments.
- GCC does not consider that the processing of your Personal Data, on the basis that it is within GCC's legitimate interests (whatever such interests might be), is unwarranted because of any prejudicial effect on your rights and freedoms or your legitimate interests.

### 6.3. Compliance with a legal obligation to which GCC is subject:

- In certain circumstances, GCC must process your Personal Data in order to comply with its legal obligations. This might include, but is not limited to, Personal Data required: for tax and accounting purposes; and for GCC to fulfil its compliance and other obligations under relevant legislation/regulation.

More information relating to legal bases for processing Personal Data can be found on the Information Commissioner's website (see details below).

## **7. Who receives your Personal Data?**

We may disclose your Personal Data to third-parties (outside of GCC and GCC Personnel) if, but only when, we have a legal basis to do. Such recipients include but are not limited to: GCC's caterers, GCC's bank, auditors and accountants; HMRC; the Home Office and Passport Services.

## **8. How do we protect your Personal Data?**

We have security arrangements in place to guard against unauthorised access, improper use, alteration, destruction or accidental loss of your Personal Data. We take appropriate organisational and technical security measures and have rules and procedures in place to ensure that any Personal Data we hold is not accessed by anyone unauthorised to access it.

When we use third-party organisations to process your Personal Data on our behalf, they must also have appropriate security arrangements, must comply with our contractual requirements and instructions and must ensure compliance with the GDPR and any other relevant data protection legislation.

## **9. Is your Personal Data transferred to "third countries" (those outside of the EEA)?**

We do not transfer your personal data to "third countries".

## **10. How long with your Personal Data be retained by GCC?**

It is our policy to retain your Personal Data for the length of time required for the specific purposes for which it is processed by GCC and which are set out in this Notice. The intended length of time is for up to seven years after you have been provided accommodation due to your data containing financial records. However, we may be obliged to keep your Personal Data for a longer period, for example, where required by our legal and regulatory obligations or to ensure we have effective back-up systems. In such cases, we will ensure that your Personal Data will continue to be treated in accordance with this Notice, restrict access to any archived Personal Data and ensure that all Personal Data is held securely and kept confidential.

## **11. What are your rights?**

The GDPR generally affords individuals a right to access their Personal Data, to object to the processing of their Personal Data, to rectify, to erase, to restrict and to port their Personal Data.

We have specific procedures in place in relation to Subject Access Requests ("SARs") that you may be entitled to make. Put simply, a SAR is a request made by you which requires us to provide you with details of your Personal Data which we hold and process and a description of how we process it. If you wish to make a SAR, please email [office@chesterhouse.org.uk](mailto:office@chesterhouse.org.uk) to request the SAR form.

There are exceptions to the rights of individuals in relation to their Personal Data. We will always respect your Personal Data and seek to be as transparent as possible but please be aware that, in some instances, we may be restricted from even acknowledging that we process your Personal Data.

## **12. How to make a complaint**

If you are unhappy with the information provided in this Notice or have concerns about the way in which GCC processes your Personal Data you may in the first instance contact GCC's DPM by emailing [office@chesterhouse.org.uk](mailto:office@chesterhouse.org.uk) If you remain dissatisfied, then you may apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at: - Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF - [www.ico.org.uk](http://www.ico.org.uk)

**13. Other information**

Further information or clarification can be obtained by emailing [office@chesterhouse.org.uk](mailto:office@chesterhouse.org.uk)

**14. Review date**

This policy was last reviewed in May 2018 and will be next reviewed in March 2019.