



Customer Privacy Notice

Introduction

Squared are committed to respecting your privacy. This policy explains how Squared may use personal information we collect about you. This policy explains how Squared comply with the law on data protection and what your rights are. For the purposes of data protection, Squared will be the data controller of any of your personal information.

This policy applies to all of Squared's customers.

References to "we," "our" or "us" in this privacy policy are to Squared. Our address is:

Luton Community Housing t/a Squared

Bramingham Business Centre,

Unit B2, Enterprise Way,

Luton,

Bedfordshire,

LU3 4BU

Our Data Protection Officer, Simon Mills oversees our compliance with data protection legislation. Contact details are in the "Contacting Us" section below.

How we use your personal information

Squared is a Registered Social Landlord and is registered with the Information Commissioner's Office as a data Controller under the UK General Data Protection Regulations.

This privacy policy explains what personal information we hold about you and how we use any personal information we collect about you when you use any of our services or when you visit our website.

What information do we collect about you?

Squared collects, processes and stores personal information about its customers. This includes current, former and potential customers, who live in our properties or access our support and other services and could also include their family and people associated with them. We hold personal data such as your:

Names, Date of Birth, contact details and records of any transactions such as payments or requests for information as well as sensitive personal data such as gender; ethnicity; religion or other beliefs, sexual orientation and medical history. We will collect, process, share and

securely store personal information in compliance with the UK General Data Protection Regulation.

All information will be retained in accordance with the requirements of our retention policy.

How we collect personal information and how do we use this?

Generally, the information we hold will have been provided by you (on application/assessments or enquiry forms or when we communicate with you), but we may also hold information provided by third parties where this is relevant to your housing and support circumstances e.g. local authority, benefit agencies, other statutory services. i.e. from social workers and health professionals (e.g. doctors, mental health worker and occupational therapists).

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. However, 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.

Lawful Basis for Processing Your Personal Data

The UK General Data Protection Regulation (UK GDPR) requires that we must have a lawful basis for all of our processing activities. Our lawful bases are as follows:

- The processing activity is necessary for the performance of a contract; or
- The processing activity is necessary for Squared to comply with their legal obligations; or
- The processing activity is performed under legitimate interest; or
- The processing activity is necessary to protect the vital interests of an individual (in a life-or-death situation).
- When you have given us your consent to do so

Where we rely on Legitimate Interest as our lawful basis, we may not always perform a Legitimate Interest Assessment (LIA). However, we ensure that any processing carried out on this basis is necessary, proportionate, and does not override your rights and freedoms. Our legitimate interests fall into these categories:

- Disclosures to public bodies, or bodies carrying out public tasks where the requesting body has confirmed it needs the information to carry out its public task.
- Safeguarding vulnerable individuals – this allows for the use of personal data for safeguarding purposes.
- Crime – this allows use of personal information where necessary for the purposes of detecting, investigating or preventing a crime; or apprehending or prosecuting offenders.
- National security, public security and defence – this allows the use personal information where necessary for purposes of safeguarding national security, protecting public security or defence.
- Emergencies – this allows use personal information where necessary when responding to an emergency.

We only rely on this basis where individuals would reasonably expect their data to be used in this way, and we take steps to minimise any privacy impact. You have the right to object to processing based on legitimate interests at any time. For more information or to exercise this right, please contact us using the details provided in this policy

For some of your personal information you will have a contractual requirement to provide us with your personal information. If you do not provide us with the requested personal information, we may not be able to properly perform our contract with you and may not be able to employ you.

Where you have given us your consent to use your personal information, you have the right to withdraw this consent at any time. You can do this by contacting us as described in the "Contacting us" section below.

Please note that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent, and we may still be entitled to hold and process the relevant personal information, to the extent that we are entitled to, on bases other than your consent.

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 is necessary;
- Kept secure.

We are committed to keeping your personal details up to date, and we encourage you to inform us about any changes needed to ensure your details are accurate. Our HR self-service tools enable you to check what information we hold and update yourself.

We will not discuss your personal information with anyone other than you unless you have given us prior written authorisation to do so or we deem it reasonable to share it for the purposes of your employment.

What information may we hold about you and how will we use this?

Where relying on legitimate interests, our reasons for doing so may be:

- For handling and resolving complaints
- To uphold the maintenance of the property
- To communicate with you in relation to your tenancy

Why does the organisation process personal data?

Squared needs to process data to enter into a tenancy contract /license agreement with you and to meet its obligations as a housing provider.

In some cases, Squared needs to process data to ensure that it is complying with its legal obligations. For example, it is required to monitor fraud prevention, report any safeguarding concerns, or to comply with health and safety laws.

How will we use the information about you?

We use your personal information to enable us to provide and manage your tenancy/license agreement and to provide services which meet your needs. Please see table below of breakdown of how we will use some of your information.

Information we collect about you	How it is used
Name, Date of Birth (DOB), Marital status, contact details, housing history	<p>Offer suitable accommodation, property and effectively communicate through preferred preference (email, phone, text, post), engage, provide information requested.</p> <p>Previous housing circumstances to assess housing applications and help prevent tenancy fraud and illegal subletting.</p>
Proof of identity – Passport, driving license, National Insurance Number	<p>To record your right to rent in the UK.</p> <p>To enable you to apply for Housing Benefit.</p> <p>To receive our support services.</p>
Financial records – bank details, methods of payments of rent, Universal credit/Housing Benefit claims, rent payments, arrears records, notices of seeking possession	<p>To set up a rent account, ensure payments are received, monitor arrears, and help if you get into arrears.</p>
<p>*Support Information (<i>if in support services</i>)– * physical/mental health issues, * health issues, * safeguarding information, additional support services, training and employment (job history), education. Household income & expenditure</p> <p>* Medical history</p>	<p>To improve your financial circumstances, live a healthy lifestyle, provide specific support, refer to relevant agencies, help apply for benefits you are entitled to.</p> <p>We may also hold information provided by third parties where this is relevant to your housing and support circumstances e.g. from social workers and health professionals (e.g. doctors, mental health worker and occupational therapists).</p> <p>Disclose medical history to A&E, emergency services, medical services if you are not capable to give consent. This could be vital where we may have to disclose your information to protect the vital interest of your child.</p>
Questionnaires, surveys, feedback	<p>To make sure that we are providing a good service, monitor our performance, carry out research to make improvements to our services to our customers.</p>
Tenancy history – rent payments, arrears.	<p>In order to manage your tenancy / license agreement.</p>

Property history - recording repair requests, gas service etc.	In order to keep a record of all work completed on your property.
Communication history, telephone call, emails, texts CCTV and other footage, voice/call and video recordings Noise recordings	We keep records if they are relevant for training and monitoring purposes, so we can ensure we are delivering a good service. For safety and crime reduction/prevention.
Reports of complaints, incidents, challenging behavior and warning markers	To keep customers, colleagues and contractors safe, ensure complaints are dealt with and risks minimised.
Photographs taken, quotes, feedback	To use in our newsletters, promotional literature, media to promote Squared (permission is always asked).
*Ethnicity, * sexuality, * religion	Monitor equal opportunities, to help customers for example if you need support or have been harassed because of any of these things. Ensure we meet all our legal and statutory duties such as those which apply under the Equality Act 2010.

Special Categories of Personal Information

Some of the above information marked with * is classed as special category personal data under the UK GDPR. Special category data is information relating to physical or mental health, sex life, religious or philosophical beliefs, political opinions, membership of a Trade union, allegations of criminal offences and criminal convictions and offences.

Other Services

We would like to provide you with information about other products and services (of ours and other reputable companies we work with) which do not form part of our core landlord services but which we think may be of interest to you. This would include information such as accessing training and employment, financial guidance and digital support. You can let us know at any time how you prefer to be contacted or if you do not want us to contact you with this information. We never provide your personal information to other companies for their marketing purposes.

Visitors

We may have to check the i.d. and do police checks of unknown and unexpected visitors due to health & safety and Safeguarding concerns. We have legitimate interest to ensure every

customer in our hostels is safeguarded and protected from harm. This include the partners who are applying to stay overnight at some of our hostels.

Children's information

We do hold data for children at some of our hostels. These are basic personal data such as name, age, DOB, next of kin for the child and parents' details. We do not share any information about children without consent unless the law and policies allow us to do so under exceptional circumstances e.g. if there's child protection or safeguarding concerns arises.

Your Rights in relation to Personal Data

You have the following rights concerning your data:

Right of Access

You have the right to obtain confirmation from Squared as to whether personal data concerning you are being processed and, where that is the case, access to that data.

Right to Rectification

You have the right to oblige Squared to rectify inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed by providing a supplementary statement.

Right to Erasure

You have the right (under certain circumstances, but not all) to oblige Squared to erase personal data concerning you.

Right to Restriction of Processing

You have the right (under certain circumstances, but not all) to oblige Squared to restrict processing of your personal data. For example, you may request this if you are contesting the accuracy of personal data held about you.

Right to Data Portability

You have the right (under certain circumstances, but not all) to oblige Squared to provide you with the personal data about you which you have provided to Squared in a structured, commonly-used and machine-readable format.

You also have a right to oblige Squared to transmit those data to another controller.

Right to Withdraw Consent

If the lawful basis for processing is consent, you have the right to withdraw that consent.

Right to Object to Direct Marketing

Where your personal data are processed for direct marketing purposes, you have the right to object at any time to processing of your personal data for marketing, which includes profiling to the extent that it is related to such direct marketing.

Rights in Relation to Automated Decision-Making and Profiling

Squared does not perform any automated decision-making based on personal data that produces legal effects or similarly affects you.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

How do we manage your personal information?

Processing of your personal information will be undertaken in accordance with the principles of the UK General Data Protection Regulation. Access to personal information is restricted to authorised individuals on a strictly need to know basis. 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 is necessary;
- Kept secure.

We are committed to keeping your personal details up to date, and we encourage you to inform us about any changes needed to ensure your details are accurate. To help us to ensure confidentiality of your personal information we will ask you security questions to confirm your identity when you call us and as may be necessary when we call you.

We will not discuss your personal information with anyone other than you unless you have given us prior written authorisation to do so. Anyone calling on your behalf may also be subject to security questions to ensure we're taking adequate steps to protect your personal information. This will only be disclosed under exceptional circumstances if there are Safeguarding concerns and it's vital to provide the relevant information for emergency medical care or when you are incapable to provide consent to the processing for medical purposes.

We may class your information under "Red, Amber or Green" (for example, in relation to your vulnerability, support needs or risks) to enable us to tailor and deliver services to you. Squared only holds records during the period of our relationship and for a set period afterwards to allow us to meet our legal obligations including resolving any follow up issues between us.

Sharing your personal information

Your personal information will be kept secure and confidential. However, there may be times when we will share relevant information with third parties or where we are legally required to do so. When sharing personal information, we will comply with all aspects of the UK General Data Protection Regulation.

Sensitive information about health, sexual life, race, religion and criminal activity for example is subject to particularly stringent security and confidentiality measures. Some of this information is stored on our web-based system which is password protected to enable to support you effectively. This information will only be accessed by the authorised team members and all support providers who have signed a Data Sharing Agreement.

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

- With our contractors, in order to undertake repairs, maintenance or improvement works, our relationships with such providers are governed by our contracts with them which include strict data sharing and confidentiality protocols;
- With community partners in connection with the delivery of coordinated local services;
- With utility companies (and their representatives) and Council Tax Offices, to ensure billing details are correct;
- With credit reference agencies and debt collection agencies, in connection with some housing applications and in relation to any outstanding charges;
- 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 & health authorities, as necessary for exercising statutory functions;
- With the Housing Regulator, Housing Ombudsman, and the Homes & Communities Agency (HCA), to comply with our regulatory obligations.

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).

Auditing and Inspections

Squared is required by law to protect the public funds it administers. Squared may share information with other bodies responsible for auditing or administering public funds, in order to prevent and detect fraud.

Access to Your Personal Information

Please contact us using your preferred contact method if you would like copies of some specific information from your files, and we will try to provide it as quickly as possible. If you require a substantial amount of your personal information, there is a formal process for this, known as a Subject Access Request (SAR).

SARs need to be made in writing (we have a subject access form you can use for this purpose), and we ask that your written request is accompanied by proof of your identity.

If someone is requesting information on your behalf, they will need written confirmation from you to evidence your consent for us to release this and proof of ID (both yours and theirs).

The access to your personal information is provided free of charge in most circumstances. However, we may charge a processing fee if the request is “manifestly unfounded or excessive”.

We have one calendar month within which to provide you with the information you've asked for (although we will try to provide this to you as promptly as possible). In some cases, if we unable to provide the information within a month, then we will notify of the reasons for the delays. This then will allow the deadline by another two months if the request is complex or multiple requests have been put in.

In response to SARs, we will provide you with a copy of the information we hold that relates to you. If you need us to correct any mistakes contained in the information, we hold about you, you can do so by contacting the Squared Data Protection Officer.

Information we collect via our website

We collect various types of information from visitors to our websites. We do not pass on any personal information you have given us to any other site, the system will record information if volunteered to us by you, for example on the online forms. This will be treated as confidential. This notice is limited to this website only. If you follow a link to an external site, we recommend that you check the privacy notice of the site before giving any personal details.

Use of Server Website stats & Use of Google Analytics

Visitors to our website: We use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behavior pattern. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

Sending & Receiving Emails

Please be aware that emails we send or receive may not be protected in transit due to the nature of email transitions generally.

Transferring your Data Internationally

The personal information collected by Squared may be transferred to and stored in countries outside of the UK. Some of these jurisdictions require different levels of protection in respect of personal information and, in certain instances, the laws in those countries may be less protective than the jurisdiction you are typically resident in. We will take all reasonable steps to ensure that your personal information is only used in accordance with this privacy policy and applicable data protection legislation and is respected and kept secure. Where a third party processes your data on our behalf, we will put in place appropriate safeguards as required under data protection legislation. For further details please contact us by using the details set out in the "Contacting us" section below.

How does the organisation protect data?

Squared takes the security of your data seriously. The organisation has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its authorised employees in the performance of

their duties. All data is stored electronically and we ensure we have appropriate technical and organisational measures in place to protect the personal data stored. We strive to work in a paperless environment and undertake regular training of our team members on data protection and security.

For how long does the organisation keep data?

The duration for which we retain your personal data will differ depending on the type of data and the reason why we collected it from you. However, in some cases personal data may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement, we retain all physical and electronic records for a period of 6 years after termination of tenancy/license agreement. Exceptions to this rule are:

- CCTV records which are held for no more than 30 days unless we need to preserve the records for the purpose of prevention and detection of crime.
- Information that may be relevant to legal claims may be retained until the limitation period for those types of claims has expired. This can be an extended period as the limitation period might not start to run until a long time after your tenancy/license agreement ends with us.

For further information on retention periods, please contact our Data Protection Officer for further information relating to your personal data.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes.

This notice is limited to this website only. If you follow a link to an external site, we recommend that you check the privacy notice of the site before giving any personal details.

Changes to this privacy notice

We keep our privacy notice under regular review, and we will place any updates on our website. Whilst we recommend that you keep up to date via the website, any major changes will be brought to your attention.

Further Information

For further information on how to request your personal information and how and why we process your information, you can contact us using the details below:

Data Protection Officer: **Simon Mills** (dpo@squared.org.uk)

Contact Number: 01582 391053

The Information Commissioner Office (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 UK General Data Protection Act.

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

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

Record of Change History

Issue	Description of Change	Approval	Date of Issue
1	Initial Issue	A Bentley & S Mills	13.05.25
2	DUA Act changes	A Bentley & S Mills	10.10.25

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