



**LGL-POL-10-04**

# **Torus Data Protection Policy**

June 2022

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<b>0.2</b>	<b>DOCUMENT INFORMATION</b>		
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<b>Ref: ICT-POL 07 01</b>	<b>Title: Information Security Management Policy</b>		
<b>Ref: LGL PRC 02 01</b>	<b>Title: Data Breach Notification Procedure</b>		
<b>Ref: LGL PRC 04 01</b>	<b>Title: Data Subject Rights Procedure</b>		
<b>Ref: LGL PRC 05 01</b>	<b>Title: Data Protection Impact Assessment Procedure</b>		
<b>Ref: GOV POL 07 02</b>	<b>Title: Data Retention and Disposal Policy</b>		
<b>Appendix 1</b>	<b>Title: Website Customer Privacy Notice</b>		

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## 1. Scope

- 1.1 This policy applies to all of Torus's activities or operations which involve the processing of personal data.
- 1.2 This policy applies to anyone who is engaged to process personal data for or on behalf of Torus including: employees, volunteers, casual and temporary staff, directors and officers, and third-parties such as sub-contractors and suppliers, and anyone with or to whom Torus shares or discloses personal data
- 1.3 The Torus Group is committed to compliance with all relevant Data Protection legislation and will formally delegate appropriate powers and responsibilities to staff to ensure that it is fully able to comply with the Data Protection Act and its own defined standards in the field of data protection and information governance.
- 1.4 Torus will ensure that all relevant staff and/or other persons it commissions to process personal data on its behalf, either directly or indirectly, have received appropriate and sufficient training in the application of Torus' policies.
- 1.5 Torus will ensure that sufficient and appropriate resources are available to ensure that it meets both its legal obligations in respect of Data Protection Legislation and the standards that it sets through its policies.
- 1.6 Torus will uphold the rights and freedoms of people conferred on them by the Data Protection Act. It will ensure that those rights and freedoms are appropriately considered in the decisions it takes which may affect people and will ensure that it has sufficient controls in place to assist people who wish to exercise their rights.
- 1.7 The Data Protection Act 2018 sets out legal responsibilities on all organisations processing personal data and provides for rights in the law conveyed on the people whose data is being processed. This Policy is a public statement describing Torus' approach to complying with its legal responsibilities in the Data Protection Act and how it enables individual rights to be upheld and exercised. Penalties can be imposed on organisations processing personal data including fines of up to €20,000,000, or 4% of total worldwide annual turnover, whichever is higher. There are several criminal offences set out in the Act and individuals can be held accountable and be sentenced by the courts for any offences committed.
- 1.8 The reader should refer to the Glossary to ensure that they understand the terms used in this Policy.

## 2. Policy Statement

**2.1** This Data Protection Policy sets out Torus' commitment and approach to data protection and provides a clear frame of reference for employees to determine Torus' standards, aims, and ideals in respect of data protection compliance. The policy's objectives are:

- To provide a clear frame of reference for employees to determine Torus' standards, aims, and ideals in respect of data protection compliance.
- To provide information to data subjects, data processors, and the regulatory authorities about how Torus approaches data protection compliance.

### **2.2 Fair Lawful and Transparent processing**

The processing of all personal data by Torus will only be undertaken in a fair, lawful and transparent manner meaning:

#### **Fairness**

No data collection activities will be undertaken or commissioned without an appropriate privacy notice (see Appendix 1) being provided to the person from whom data is being collected and to the people who the data is about if personal data is collected from sources other than the data subject.

#### **Lawfulness**

No data collection activities will be undertaken or commissioned without there being a lawful ground for the data processing activities intended to be applied to the personal data. Where the lawful grounds are consent, the consent policy will apply. Where the lawful grounds are legitimate interests a legitimate interest's assessment (LIA) will be undertaken and documented. The information process owner is responsible for ensuring that there are lawful grounds for all data processing activities that fall under their sphere of control, that the consent policy is adhered to and a LIA is properly undertaken where necessary. The DPO will provide advice regarding lawful processing conditions.

#### **Transparency**

Torus will endeavor to provide sufficient information about how personal data is being processed to enable sufficient transparency about its handling of personal data.

### **2.3 Data processing purposes**

Personal data will only be collected, created or otherwise obtained for specific, explicit and legitimate purposes. No new data processing will be undertaken or commissioned

without prior discussion with the DPO who shall maintain a register of data processing activities and their purpose. Data process owners are responsible for ensuring that all of the data processing activities that they undertake and / or commission have been approved by the DPO. No personal data will be used for any purpose other than that which it was collected and / or created for, in accordance with this policy.

#### **2.4 Data minimisation**

Torus will strive to use a minimum of personal data in its data processing activities and will periodically review the relevance of the information that it collects. Data process owners are responsible for ensuring that no unnecessary, irrelevant or unjustifiable personal data is collected or created either directly or indirectly through the data processing activities they are responsible for and / or engage in. The DPO will provide advice regarding the justification of personal data collected or created, where required.

#### **2.5 Data accuracy**

Torus recognises that the accuracy of data is important and that some data is more important to keep up-to-date than others. Torus will use its reasonable endeavors to maintain data as accurate and up-to-date as possible, in particular data which would have a detrimental impact on data subjects if it were inaccurate or out-of-date. Data process owners are responsible for ensuring that personal data they have collected or created either directly or indirectly through the data processing activities they are responsible for and / or engage in is maintained, accurate and up-to-date and that personal data, the accuracy of which cannot reasonably be assumed to be accurate and up-to-date, is treated appropriately through erasure or anonymisation.

#### **2.6 Data retention**

Torus will ensure that it does not retain personal data for any longer than is necessary for the purposes for which it was collected and will apply appropriate measures at the end of data's useful life such as erasure or anonymisation. Torus will aim to follow the guidelines set by the National Housing Federation or other related bodies, but where these are not suitable, Data owners will be responsible for determining the retention period for specific personal data under their control or sphere of influence, in accordance with the Group's Data Retention and Disposal Policy. . Because data retention is a vitally important issue as both the over-retention and under-retention of personal data could have a detrimental impact on both the data subject and Torus the DPO, in conjunction with the members of the Data Protection Management Group, will undertake regular data retention audits.

#### **2.7 Information security**

Torus will ensure that any personal data that it processes or commissions is processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures. In particular an Information Security Management Policy (ISMP) will be maintained

setting out specific policies relating to the maintenance of personal data security, confidentiality, availability and integrity. The Group Director of Business Transformation & ICT will be responsible for the formulation of the ISMP.

## **2.8 Record keeping and accountability**

To fulfil its responsibility to be able to demonstrate compliance with Data Protection Legislation, Torus will maintain records of the processing activities that it controls, undertakes or otherwise commissions as required by the Data Protection Act and specifically those required in Article 30 of the UK General Data Protection Regulations (UK GDPR).

## **2.9 Information rights**

Torus recognises the legal rights of those whose data it is processing or intends to process and will ensure that appropriate information is provided to them advising them of their rights, and that policies and procedures are maintained to ensure that Torus is able to recognise information rights requests and handle them appropriately when they are exercised. The UK GDPR provides the following rights for Individuals:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling

## **2.10 Consent**

Torus will interpret consent to be as defined in the UK GDPR and that any consent shall not be valid unless:

- there is a genuine choice.
- it has been explicitly and freely given, and represents a specific, informed and unambiguous indication of the data subject's wishes that signifies agreement to the processing of personal data relating to them.
- the consent was given through statement made by the data subject or by a clear affirmative action undertaken by them.
- Torus can demonstrate that the data subject has been fully informed about the data processing to which they have consented and is able to prove that it has obtained valid consent lawfully.
- a mechanism is provided to data subjects to enable them to withdraw consent and which makes the withdrawal of consent in effect as easy as it was to give and that the data subject has been informed about how to exercise their right to withdraw consent;

Torus recognises that consent may be rendered invalid in the event that any of the above points cannot be verified or if there is an imbalance of power between the data controller and the data subject. Torus recognises that consent cannot be forever and will determine a consent refresh period for every instance where consent is the lawful condition for processing.

#### **2.11 Personal Data Breaches**

Torus will maintain a Data Breach Reporting Procedure and will ensure that all employees and those with access to personal data are aware of it and this breach reporting policy. All employees and individuals with access to personal data for which Torus is either data controller or processor must report all personal data breaches to their line manager, and the DPO as soon as they become aware of the breach. Torus will log all personal data breaches in accordance with Article 33 (5) of the GDPR and will investigate each incident without delay. Appropriate remedial action will be taken as soon as possible to isolate and contain the breach, evaluate and minimise its impact, and to recover from the effects of the breach.

The breach reporting procedure will set out responsibilities, decision-making criteria and timescales for notifying data subjects, the Information Commissioner and the media about a personal data breach. Data protection near misses will also be recorded and investigated in the same manner as data protection breaches.

#### **2.12 Data Processors**

Torus reserves the right to contract out data processing activities or operations involving the processing of personal data in the interests of business efficiency and effectiveness. No third-party data processors will be appointed who are unable to provide satisfactory assurances that they will handle personal data in accordance with the Data Protection Legislation. People wishing to appoint a data processor will ensure that appropriate due diligence is undertaken on the proposed data processor in the field of information governance and data protection compliance prior to their appointment. The Group Head of Procurement will provide advice and guidance in respect of this as required. A written agreement will be implemented between Torus and the data processor which at least meets the requirements of the Data Protection Legislation. The DPO will ensure that a register of such agreements / arrangements is maintained. The data processor agreement will specify what is to happen to personal data upon termination of the data processing agreement.

No employee is permitted to commission or appoint a third party to process data on behalf of Torus without adhering to this policy.

#### **2.13 Data sharing, disclosure and transfer**

Torus will only share personal data with or otherwise disclose personal data to other organisations and third parties where there is a legal basis for doing so and the data sharing is necessary for specified purposes. No data sharing or disclosure is permitted to occur without a suitable legally enforceable agreement satisfying the requirements for such agreements, as set out in the Data Protection Legislation, being in place. Data sharing agreements must be approved by the DPO who will maintain a register of all



such agreements. Appropriate risk assessments will be undertaken prior to any data sharing taking place on those with whom we intend to share personal data. This policy extends to appointing others to process personal data on our behalf, sharing personal data with organisations, and providing information to ad hoc requests such as those which may be received from the police and other authorities.

Torus will provide information to all employees setting out safe and approved methods of transferring personal data to recipients. Employees are required to use only approved methods of data transfers. Disciplinary action may be taken against employees who fail to observe the ICT information Transfer Policy and use unsafe and insecure methods of data transfer unless such methods have been approved in writing by the Group Director of Business Transformation & ICT

#### **2.14 International transfers of personal data**

Torus will neither transfer nor process or permit personal data to be transferred or processed outside the United Kingdom without the conditions laid down in the Data Protection Act being met to ensure that the level of protection of personal data is not undermined. Any transfer or processing of personal data that Torus undertakes or commissions, whether directly or indirectly must be approved by the relevant member of GLT and may only take place if one of the following is satisfied:

- The territory into which the data is being transferred is one approved by the UK's Information Commissioner.
- The territory into which the data is being transferred is within the European Economic Area.
- The territory into which the data is being transferred has an adequacy decision issued by the European Commission.
- The transfer is made under the unaltered terms of the standard contractual clauses issued by the UK's Information Commissioner for such purposes.
- The transfer is made under the provision of binding corporate rules which have been approved and certified by the UK's Information Commissioner. The transfer is made in accordance with one of the exceptions set out in the Data Protection Legislation.

#### **2.15 Risk assessment**

Torus will adhere to the principles and foster a culture of privacy by design and by default. It will maintain a policy requiring data protection impact assessments (DPIA) to be undertaken and documented and ensure that appropriate resources are available to advise on DPIAs. The DPO is responsible for maintaining a risk register of data protection compliance risks that have been identified by Torus and for its periodic review.

#### **2.16 Children's data**

Special measures will be taken by Torus if it processes personal data relating to children under the age of 13 (only children aged 13 or over are able to provide their

own consent) including the nature of privacy information provided and approach to information rights requests.

## **2.17 Special Categories of Personal Data**

Some sensitive data may be processed to ensure Torus is operating effectively (such as data in respect of health, disabilities or sexual orientation) for the purposes of e.g. implementing an internal or external equal opportunities policy, implementing a sick pay policy or providing information to government bodies etc.

“Special categories” of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with explicit written consent.
2. Where it is needed to carry out legal obligations and in line with this data protection policy.
3. Where it is needed in the public interest, such as for equal opportunities monitoring, and in line with this data protection policy.
4. Where it is needed in relation to a legal claim or where it is needed to protect the data subject’s interests (or a third party’s interests) and there is no capacity to give consent, or where the information has already been made public.

## **2.18 Audit and compliance checking**

Torus will undertake periodic compliance checks to test whether its policies and procedures are being adhered to and to test the effectiveness of its control measures. Corrective action will be required where non-conformance is found. Records will be kept of all such audits and compliance checks including corrective action requests raised. Disciplinary action may be taken against individuals who fail to act upon the reasonable corrective action requests properly formulated and raised through data protection audits. The Group Audit and Risk Committee will be provided with the findings of such audits periodically.

## **3. Implementation**

**3.1** Torus will maintain a suite of policy documents setting out how it intends to implement management controls sufficient to ensure legal compliance and will ensure that these documents are reviewed periodically to:

- (a) test their adequacy in meeting the legal standards as they change over time; and
- (b) to test Torus’ compliance with them.

- 3.2** Torus will ensure that it works within the six data protection principles and that it will implement sufficient controls to ensure that it is able to demonstrate compliance with the legislation including the keeping of sufficient records of data processing activities, risk assessments and decisions relating to data processing activities.
- 3.3** Torus will ensure that all employees are provided with appropriate training on UK GDPR which will help in the application of this and other data protection policies and procedures and in their data protection responsibilities. It will also undertake data protection awareness raising activities from time to time to keep data protection front of mind. All training and awareness raising activities will be logged. Refresher training will be provided annually.

## **4. Responsibility**

### **4.1 Data Controllers**

Torus62 Limited, Housing Maintenance Solutions, Torus Foundation and Torus62 Development Company Limited are all registered as data controllers with the Information Commissioner's Office.

### **4.2 Management and supervisory staff**

The Chief Executive is the accountable officer responsible for the management of Torus and ensuring appropriate mechanisms are in place to support service delivery and continuity. Protecting data and thus maintaining confidentiality is pivotal to Torus being able to operate.

Each member of the Torus Group Leadership Team must ensure that staff in their respective areas of responsibility are aware of this policy, other relevant policies and procedures, and their responsibilities concerning the processing of personal data.

Managers and supervisory staff are responsible for ensuring that all data processing operations under their control or sphere of responsibility or commissioned by them are undertaken in compliance with this policy and other relevant data protection policies. All staff must be sufficiently aware of this policy and how it applies to their job role and sufficiently trained to carry out their duties in compliance with this policy.

### **4.3 Data Protection Officer**

The Data Protection Officer ("DPO") is responsible for providing the policies, guidance and training needed to ensure Torus is both compliant with Data Protection Legislation and risk assessed. The DPO will monitor and report to senior management in respect of compliance with this policy, investigate any breaches, and maintain suitable records of processing activities. They may co-opt other individuals to assist with the management of data protection obligations. The DPO is responsible for monitoring

the evolution of the Data Protection Legislation, case law, guidance, and codes of practice and incorporating relevant changes into Torus' policy.

#### **4.4 Group Director of Transformation & ICT**

The Group Director of Transformation and ICT is responsible for the security, implementation, running and maintenance of the hardware and software utilised by Torus. In addition, responsibility for shaping the use of data across the organisation including the systems that are utilised, the way data is collected and stored and how it is used by Torus falls within this remit. The Director will work with the DPO to ensure compliance with UK GDPR and other DP legislation.

#### **4.5 Employees, volunteers, casual/temporary workers, directors and officers etc.**

Anyone who is directly engaged by Torus to undertake data processing activities including but not limited to employees, volunteers, casual / temporary workers, directors and officers etc. involved in the receipt, handling or communication of personal data must adhere to this policy. Anyone who is not confident in or has concerns about data handling practices that they are undertaking, or witnessing should contact the Data Protection Officer. Individuals are expected to complete appropriate training from time to time. Everyone within Torus has a duty to respect data subjects' rights to confidentiality.

Disciplinary action and / or penalties could be imposed on staff for non-compliance with relevant policies and legislation.

#### **4.6 Partner & Third-Party Responsibilities**

Any Third Party or Organisation that is commissioned to process data or receives data from Torus or can access any personal data **must** enter into a legally enforceable agreement with Torus, the nature of which will be determined by the level of involvement with the data that is held / shared / accessed. Any such agreement must be approved by the DPO

## **5. Monitoring & Review**

The policy will be owned, updated and reviewed by the Data Protection Officer.

The policy will be reviewed every three years unless there is a change in legislation which means that it must be amended before that date.

## **6. Glossary**

Data Controller	means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
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Data Processor	means a natural or legal person, public authority, agency or other body that processes personal data on behalf of and under the instructions of the controller.
Data subject	An individual whose data is collected, held, and/or processed by a data controller for varying purposes and who can be identified, directly or indirectly, by reference to such personal data.
Data Process Owner	The person responsible for the instigation or on-going maintenance of a data process or data processing operation.
Personal data	Any information relating to an identified or identifiable natural person, including a name, an identification number, location data, an online identifier to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.
Natural person	A living human being
Special Categories of Personal Data	means any personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation; The processing of this data needs greater protection.
Processing	means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
Information Incident	means an identified occurrence or weakness indicating a possible breach of information security or failure of safeguards, or a previously unknown situation which may be relevant to the security of information.
Personal Data Breach	means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.
Risk	The chance of something happening, which will have an impact upon objectives. It is measured in terms of consequence and likelihood.
Risk Management	The culture, processes and structures that are directed towards the effective management of potential opportunities and adverse effects.

Corporate Data	Corporate data relates to any sensitive corporate information including meeting schedules, agendas and minutes of meetings; financial accounts; contracts; and organisational policies and procedures.
Recipient	means a natural or legal person, public authority, agency or another body, to which the personal data is disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of that data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;
Third party	Means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.
Profiling	Is any form of automated processing of personal data intended to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict that person's performance at work, economic situation, location, health, personal preferences, reliability, or behaviour. This definition is linked to the right of the data subject to object to profiling and a right to be informed about the existence of profiling, of measures based on profiling and the envisaged effects of profiling on the individual.
Consent	Means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which the person, by way of a statement or by a clear affirmative action, signifies agreement to the processing of personal data.

**7. Appendix 1**



**torus**

## **Torus Group Website Privacy Policy**



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## Introduction

Welcome to our privacy policy.

Please note that this privacy policy relates to the activities of Torus62 Limited (Torus), Torus Developments Limited (Torus Developments), Torus Foundation (Torus Foundation) and Housing Maintenance Solutions Limited (HMS) (collectively referred to as the "Torus Group", "we", "us" or "our" in this privacy policy).

The Torus Group respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website(s) (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

By using this website, you signify your acceptance of this policy. If you do not agree to this policy, please do not use our website(s). Your continued use of the website(s) following the posting of changes to this policy will be deemed your acceptance of those changes.

## 1. Important information and who we are

### Purpose of this privacy policy

This privacy policy aims to give you information on how the Torus Group collects and processes your personal data through your use of this website, including any data you may provide through this website when you enquire about our services.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

## Controller

This privacy policy is issued on behalf of the Torus Group so when we mention Torus Group, "we", "us" or "our" in this privacy policy, we are referring to the relevant company in the Torus Group responsible for processing your data.

We will let you know which entity will be the controller for your data when you purchase a product or service with us. Torus is the controller and responsible for this website.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us using the details set out below.

### Who is the Torus Group and how to get in touch?

If you have any questions about this privacy policy or our privacy practices, please contact our DPO in the following ways:

#### Torus (trading as Torus Landlord and Torus Homes)

Torus trades under the names Torus Landlord and Torus Homes.

- **Torus Landlord** provides social and other types of housing, including property and grounds maintenance and repair; housing, tenancy or lease management and account as your landlord; and additional optional services such as organising and assisting community events; offering opportunities to be involved (co-regulation); providing welfare, benefits and debt advice; adaptations made to the properties we manage; and selling properties.
- **Torus Homes** sells affordable homes.

Full name of legal entity: Torus62 Limited, a registered society in England and Wales (Company No. RS007826)

Email address: [dpo@torus.co.uk](mailto:dpo@torus.co.uk)

Postal address: 4 Corporation Street, Helena Central, St. Helens, Merseyside, WA9 1LD, United Kingdom

## Torus Developments

Torus Developments is one of the biggest developers in the North West and delivers new homes for rent, affordable home ownership and to meet the needs of the aging population.

Full name of legal entity: Torus Developments Limited, a private limited company in England and Wales (Company No. 09687200)

Email address: [dpo@torus.co.uk](mailto:dpo@torus.co.uk)

Postal address: 4 Corporation Street, Helena Central, St. Helens, Merseyside, WA9 1LD, United Kingdom

## Torus Foundation

Torus Foundation is a Registered Charity regulated by the Charities Commission which provides advice and assistance to adults and children in relation to employment, health and wellbeing, digital inclusion and financial inclusion; sports and activities; and grant funding to build the capacity of other charitable and community organisations.

Full name of legal entity: Torus Foundation, a private limited company by guarantee in England and Wales (Company No. 08444912) and a registered charity with the charity commission (Registration No. 1152903)

Email address: [dpo@torus.co.uk](mailto:dpo@torus.co.uk)

Postal address: 4 Corporation Street, Helena Central, St. Helens, Merseyside, WA9 1LD, United Kingdom

## HMS

HMS is a wholly owned subsidiary of Torus and undertakes property maintenance and repair to both domestic and commercial premises; general construction activities including new build developments; planned maintenance and property Improvement programme works; facilities maintenance including, grounds maintenance, cleaning and caretaking.

installation, servicing and maintenance to gas appliances; installation, testing and maintenance of electrical systems; and independent living adaptations to properties.

HMS also provides additional optional services including organising and assisting community events, and apprentice training opportunities.

Full name of legal entity: Housing Maintenance Solutions Limited, a private limited company in England and Wales (Company No. 07237932)

Email address: [dpo@torus.co.uk](mailto:dpo@torus.co.uk)

Postal address: 4 Corporation Street, Helena Central, St. Helens, Merseyside, WA9 1LD, United Kingdom

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)) and/or to the Housing Ombudsman Service (HOS), the UK supervisory authority for housing organisations registered with them (<http://www.housing-ombudsman.org.uk/>). We would, however, appreciate the chance to deal with your concerns before you approach the ICO and HOS so please contact us and our customer service teams in the first instance.

#### Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated in May 2021. Historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

#### Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## 2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- in respect of the Torus Group:
  - **Usage Data** includes information about how you use our website and services, for example inputting details of your transactions to utilise features on the site; and
  - **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- in respect of suppliers of the Torus Group:
  - **Identity Data** includes first name, maiden name, last name, accreditations, qualifications.
  - **Contact Data** includes billing address, delivery address, email address and telephone numbers.
  - **Financial Data** includes VAT numbers, bank account and insurance details; and
  - **Technical Data** includes the type of device you have used to access the site (including the make, model, operating system, internet protocol (IP) address and browser type, your login data and version, time zone setting and location, browser plug-in types and versions;
- in respect of potential home buyers from TorusHomes:
  - **Identity Data** includes proof of your identity / photo ID, first name, maiden name, last name, title, date of birth, gender, marital status, status (first time buyer or current home owner) and details of anyone that will be living with you and landlord references;
  - **Profile Data** includes your interests, preferences (including details of the developments you are interested in and locations), feedback and survey responses.
  - **Contact Data** includes billing address, delivery address, email address and telephone numbers, details of professional advisors (name of independent financial advisors and solicitors).

- **Financial Data** includes bank details, savings, proof of deposit, bank statements, lender details, mortgage offer, maximum amount of money you are able to borrow (as confirmed by your independent financial advisors); and
- **Technical Data** includes the type of device you have used to access the site (including the make, model, operating system, internet protocol (IP) address and browser type, your login data and version, time zone setting and location, browser plug-in types and versions;
- in respect of customers of Torus Landlord:
  - **Identity Data** includes proof of your identity / photo ID, first name, maiden name, last name, details of anyone acting on your behalf, title, date of birth, gender, marital status, National Insurance number (your unique identifier), proof of address details, proof of housing eligibility, any interest or equity in other property, medical details (allergies, health conditions, disabilities, or vulnerabilities), of all household residents;
  - **Contact Data** includes billing address, delivery address, email address and telephone numbers.
  - **Financial Data** includes VAT numbers, bank account, insurance, payment card details, payslips, income details and bank statements and financial information to provide assistance and advice on financial matters; and
  - **Technical Data** includes the type of device you have used to access the site (including the make, model, operating system, internet protocol (IP) address and browser type, your login data and version, time zone setting and location, browser plug-in types and versions;
- in respect of beneficiaries, the tenant(s), leaseholder(s) or member(s) of Torus Foundation:
  - **Identity Data** includes proof of your identity / photo ID, first name, maiden name, last name, details of anyone acting on your behalf, title, date of birth, gender, medical details (allergies, health conditions, disabilities, or vulnerabilities) of all household residents;
  - **Contact Data** includes emergency contacts, billing address, delivery address, email address and telephone numbers.
  - **Financial Data** includes financial information to provide assistance and advice on financial matters.



- o **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us (although card details are not stored); and
- in respect of HMS:
  - **Identity Data** includes proof of your identity / photo ID, first name, maiden name, last name, details of anyone acting on your behalf, title, date of birth, gender of all household residents.
  - **Contact Data** includes billing address, delivery address, email address and telephone numbers; and
  - **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us (although card details are not stored).

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing interested in particular services. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

Torus and Torus Foundation are the only entities which will collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data).

Torus may also collect further personal data that will vary on a case by case basis to help us resolve breach of tenancy, alleged anti-social behaviour or fraud whilst Torus Foundation may also collect other personal information that will vary on a case by case basis to help us resolve behavioural issues (including any information about criminal convictions and offences).

#### Children's personal data

Unless otherwise set out in this privacy policy, only Torus Foundation usually processes data relating to children and all other website(s) are not intended for children and we do not knowingly collect data relating to children on these

website(s). Torus Foundation processes data collected from children in respect of the following activities:

- FireFit Hub memberships.
- Health bursaries.
- School holiday camps.
- Engagement in health and wellbeing activities; and
- Incidents / accidents and safeguarding concerns.

Torus does not normally process children's information as part of a tenancy, as all tenants are adults. However, we record children's basic information if they are resident in one of our properties, including their name and date of birth.

This is required for checking the property is not overcrowded and to assess other tenancy management issues where all householders and ages are required to be known.

We may receive children's information if we are involved in the housing and tenancy aspects of a welfare case as part of a multi-agency working solution.

#### If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

### 3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity and Contact Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for our housing, products or services.
  - create an account on our website.
  - subscribe to our services or publications.
  - request marketing to be sent to you.

- enter a promotion or survey; or
- give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our [cookie policy](#) for further details.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
  - Technical Data from the following parties:
    - analytics providers.
    - advertising networks based; and
    - search information providers.
  - Identity and Contact Data from data brokers or aggregators and publicly available sources such as Companies House and the Electoral Register based inside the EU.

## 4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances: where we need to perform the contract, we are about to enter into or have entered into with you.

- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- where we need to comply with a legal obligation.
- if you are a new supplier:
  - where it is necessary to add you to our system to enable purchase orders and payments to be made.
  - where you are providing information as part of a new supplier procurement process this information is part of the selection process.
  - where we need to ensure that your business is financially viable, we may conduct checks via Experian.

If you choose to send us an email via the website, we simply collect your name, email address and the nature of your enquiry. This allows us to respond to your

query quickly and efficiently. Once we have responded, assuming your query is dealt with, we delete this data.

Please go to the Glossary to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

**Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
<b>Torus Group</b>		
To register you as a new customer / supplier	(a) Identity (b) Contact	Performance of the services for you
To process and deliver your order including:  (a) Manage payments, fees and charges  (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to recover debts due to us)
To register you as a user to comment or use certain features of the site	(a) Identity (b) Contact	Performance of the services for you
To manage our relationship with you which will include:	(a) Identity	(a) Performance of the services for you

<p>(a) Notifying you about changes to our terms or privacy policy.</p> <p>(b) Asking you to leave a review or take a survey; and</p> <p>(c) Providing marketing materials (such as a newsletter) to you subject to opting-in to such marketing materials.</p>	<p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how members use our products/services)</p>
<p>To enable you to partake in a complete a survey or promotional activities.</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p>	<p>(a) Performance of the services for you</p> <p>(b) Necessary for our legitimate interests (to study how members use our products/services, to Develop them and grow our business)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(f) Technical</p>	<p>Necessary for our legitimate interests (to study how members use our products/services, to develop them, to grow our Business and to inform our marketing strategy)</p>
<p>To use data analytics to Improve our website, products/services, marketing, member Relationships and experiences</p>	<p>(a) Technical</p> <p>(b) Usage</p>	<p>Necessary for our legitimate Interests (to define types of members for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>

To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile and (f) Marketing Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)
To administer any content uploaded to the website in forum or blog sections or otherwise.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  (b) Necessary to comply with a legal obligation
<b>Torus</b>		
To inform business insights, for example when we are determining the make-up of our supply chain relating to geography, size and financial viability.	(a) Identity (b) Contact (c) Financial	(a) Necessary for our legitimate interests (to review our supply chain in respect of our products/services, to develop them and grow our business)
To administer prospective candidate applications via a recruitment portal operated by a third-party provider.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	(a) Necessary for our legitimate interests (to assess new candidates in respect of job openings)
<b>Torus Homes</b>		
To arrange a viewing.	(a) Identity (b) Contact	(a) Performance of the services for you
To provide updates about our new homes and developments, sites, homes	(a) Identity (b) Contact	(a) Performance of the services for you

or events you might be interested in.		
To ensure that you qualify for shared ownership.	(a) Identity (b) Contact (c) Financial	(a) Performance of the services for you
To enables us to complete the sale of the property.	(a) Identity (b) Contact (c) Financial	(a) Performance of the services for you
To assess demand for specific areas or property types.	(a) Identity (b) Contact (c) Financial	(a) Performance of the services for you
To enter into our tenancy or contract with you.	(a) Identity (b) Contact (c) Transaction	(a) Performance of the services for you  (b) Necessary to comply with a legal obligation
<b>Torus Landlord</b>		
To manage your account charges and payments, including arrears.	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) The processing is necessary for the performance of our tenancy (or contract) with you. We use this basis for all processing concerning the managing of your tenancy, your account with us and your property  (b) Necessary to comply with a legal obligation
To manage the repairs, maintenance and adaptations of our properties.	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of the services for you  (b) Necessary for our legitimate interests (to maintain our properties)  (c) Necessary to comply with a legal obligation
To ensure tenancy (or contract) conditions are	(a) Identity	(a) Performance of the services for you

complied with, such as dealing with anti-social behaviour or fraud.	(b) Contact (c) Financial (d) Transaction	(b) Necessary for our legitimate interests (to deal with anti-social behaviour, detecting and prosecuting fraud or otherwise ensuring that tenancy conditions are complied with)  (c) Necessary to comply with a legal obligation
To check that you are eligible for a social housing property.	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of the services for you  (b) Necessary for our legitimate interests (to check your eligibility)  (c) Necessary to comply with a legal obligation
To carry out affordability checks when looking at allocating a property.	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of the services for you  (b) Necessary for our legitimate interests (to check your eligibility)  (c) Necessary to comply with a legal obligation
To check you are able to manage a tenancy.	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of the services for you  (b) Necessary for our legitimate interests (to check your suitability)  (c) Necessary to comply with a legal obligation
<b>Torus Foundation</b>		
To match suitable opportunities to your needs e.g. financial assistance	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of the services for you  (b) Necessary for our legitimate interests (to check your suitability)  (c) Necessary to comply with a legal obligation
To manage your membership or your child's engagement with the services on offer.	(a) Identity (b) Contact (c) Financial	(a) Performance of the services for you  (b) Necessary to comply with a legal obligation
<b>HMS</b>		



To maintain and manage repairs and adaptations of properties both domestic and commercial and open spaces.	(a) Identity (b) Contact (c) Transaction	(a) Performance of the services for you  (b) Necessary to comply with a legal obligation
To conduct surveys regularly and periodically relating to our services in order to gauge satisfaction and make improvements based on feedback.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	(a) Necessary for our legitimate interests (to make relevant improvements to the services)

**Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

- **Promotional offers from us**

We may use your Identity, Contact, Technical, Usage and Profile Data 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 call this marketing).

You will only receive marketing communications from us if you have opted-in to receive direct marketing. You may remove your consent to receive direct marketing or object about direct marketing by contacting the relevant Torus Group entity by the contact information above.

- **Third-party marketing**

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

- **Opting out**

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase, warranty registration, service experience or other transactions.

Torus Foundation customers receive our newsletter electronically with information about what is going on within the organisation. You may opt-out of receiving this by contacting [info@torusfoundation.org.uk](mailto:info@torusfoundation.org.uk).

- **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see <https://www.torus.co.uk/cookie-policy/>.

- **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law. Photographs may be taken and used for general marketing providing individuals give consent for business related purposes.

## 5. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table above:

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.
- Specific third parties such as:
  - Alcumus Group Limited t/a SafeContractor – for the provision of health and safety accreditations.
  - The Rocket Science Group LLC t/a Mailchimp – for the provision of communication and marketing services (including SNAP surveys) for the benefit of Torus.
  - WhatsApp LLC – some teams in the Torus Group utilise WhatsApp as a method of communication. This is end-to-end encrypted and is the chosen form of communication to ensure your personal data is secure at all times.
  - Microsoft – for use of Microsoft Teams to communicate internally within the Torus Group; and
  - Google Analytics.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We will not sell your personal data on to third parties.

### Contractors

Our contractors are required to comply with the law and our own data processing agreement to ensure data is managed appropriately and for specified purposes, including to complete responsive or planned property repairs.

## 6. International transfers

Each member of the Torus Group is based in the United Kingdom (UK) and data is predominantly held on servers within the UK and we do not usually transfer or store your personal data outside the UK.

In the event that we, or some of our External Third Parties, transfer or store personal data on servers outside of the UK we take additional steps to ensure that your information is protected to at least an equivalent level, as required by applicable data protection laws.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.
- we ensure your personal data is protected by requiring all our group companies to follow the same rules when processing your personal data. These rules are called "binding corporate rules".

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

## 7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: see your legal rights below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Our Customer Service Centre phone calls are recorded for training and monitoring purposes and our recordings are held for a period of three months.

We operate a continuous CCTV system at all our office premises for the detection and prevention of crime and recordings are held for 30 days. CCTV / sound recordings and / or use photography may be used to capture evidence of breach of tenancy, alleged anti-social behaviour or crime.

Torus Foundation will store your information for a period of 3 years as standard. However, if you are involved in an incident or safeguarding concern, we will retain your information for a period of 7 years as per NSCCP guidance.

If you would like to find out more information in relation to our retention and disposal policy, please see our retention policy.

## 9. Property Information

These paragraphs relate to HMS and Torus in respect of our work in relation to properties.

Much of the data we use relates to our properties and their maintenance and repair. We do not consider property information used in conjunction with the property address to be your personal information.

We are usually happy to provide you with answers to questions you may have about the property you are living in and work done to it.

As soon as your Identity or Contact Data is used in conjunction with property information, such as to complete a property repair visit, then this is treated as personal information.

Repair services can be accessed via digital platforms (online) to allow convenient access such as 'My Account' – the company's secure online self-service portal for Torus tenants.

If you use the 'My Account' service, it is important that you keep your account & password secure and do not share your 'My Account' details with any other person.

## 10. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data; and
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us.

### No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

### What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

## 11. Glossary

### LAWFUL BASIS

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

## THIRD PARTIES

### Internal Third Parties

Other companies in the Torus Group acting as joint controllers or processors and who are based in the United Kingdom and looking for appropriate suppliers, consultants and contractors or otherwise.

### External Third Parties

- Service providers, suppliers, business partners and sub-contractors acting as processors based in the United Kingdom and the European Union who provide IT and system administration services.
- Professional advisers acting as processors including lawyers, agents, mortgage brokers, financial advisors, court agents, surveyors, valuers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Website designers and marketing agents acting as processors based in the United Kingdom who provide their services which may require access to personal data.
- Analytics and search engine providers that assist us in the improvement and optimisation of our website.
- language translation service providers if it is necessary to translate any information into or from a foreign language for you.
- contractors who are carrying out services on our behalf; and
- IT and software providers who supply us with our IT infrastructure for the provision of our services and administering our business (including our internal and external communications) and who also help us manage our customer and contact databases, customer relationships and marketing.



## YOUR LEGAL RIGHTS

You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful, but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.

- You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.