



Privacy Notice

Who We Are

Andium Homes Limited is a Company Limited by Guarantee and Affordable Housing Provider, wholly owned by the States of Jersey.

Andium Homes is Jersey's largest provider of affordable housing, managing more than 4,500 properties and providing homes for more than 10,000 Islanders.

Andium Homes Limited (*'we' or 'us' or 'our'*) gather and process your personal information in accordance with this privacy notice and in compliance with the Data Protection (Jersey) Law 2018 and any related Regulations and guidance.

This privacy notice provides you with the necessary information regarding your rights and obligations, and explains how, why and when we collect and process your personal data.

Andium Homes Limited's registered office is at **33 Don Street, St Helier, Jersey. JE2 4TQ** and we are a company registered in Jersey under company N° 115713.

Our designated Data Protection Officer/Appointed Person can be contacted at dpo@andiumhomes.je.

We are registered with the Data Protection Authority's Register of Data Controllers under registration number 16312 and act as the [data controller/data processor].

The Data Protection Authority can be contacted at enquiries@oicjersey.org

Information That We Collect

Andium Homes Limited processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than specified in this privacy notice.

The personal data that we may collect from you is: -

What data we may hold about you:	Why we need it:	How it is held:
Your tenancy:		
<ul style="list-style-type: none"> • Your contact information and that of your household members including children. • Your tenancy arrangements including any arrangements to address special needs or vulnerabilities. • A summary of each contact with you. • Your complaints and compliments. • Your responses to our surveys. • Website survey or service requests. • Quality assurance tests. • Legal documents. 	<p>To provide you with the most effective, targeted and accessible service we can.</p> <p>To comply with other legislation such as the Residential Tenancy Law and Rates Law.</p>	In our customer relationship database or an approved secure contractor database.
When entering into a new tenancy:		
<ul style="list-style-type: none"> • Your means of identification. • Your housing status. • Previous rental history. • Credit check information. • Supported housing requirements. 	To allocate housing to those in most need in accordance with the Affordable Housing Gateway and relevant legislation.	Some older tenancies are held in our hard copy files. Others are stored in our secure document management database.
Your rent account:		
<ul style="list-style-type: none"> • Your rent account details and enquiries. • Direct Debit and Bank Account Details. • Your rental transactions. • Details of debtors and arrears. 	To ensure we know your rent is paid correctly.	In our secure customer relationship database.
Our parking contractor may hold:		
<ul style="list-style-type: none"> • Your parking permit requests and correspondence. • Details of all enforcement action. 	<p>To provide efficient parking services for you.</p> <p>To comply with the relevant parking regulations</p>	In the contractor's secure database and in time within our secure customer relationship database.
Our Maintenance Contractors may hold:		

<ul style="list-style-type: none"> • All of the information detailed in the 'Your Tenancy' section above. • Your requests for maintenance services and their management. • Your response to customer satisfaction surveys. 	<p>To keep you and contractors safe.</p> <p>To provide maintenance services as efficiently as possible.</p>	<p>Digital documents, password protected and controlled.</p> <p>In our secure customer relationship database or an approved secure contractor database.</p>
We and our Insurers may hold:		
<ul style="list-style-type: none"> • Accident records including any relevant medical data. 	To aid investigation and to administer insurance claims.	Digital documents, stored in encrypted databases.
When you visit our Don Street Offices we may hold:		
<ul style="list-style-type: none"> • Audio recordings of your visit. • Closed circuit television recordings of your visit. • Back-ups of all the above data. 	To keep our clients and colleagues safe and for training purposes.	In our secure data storage systems.
• When we speak to you on the phone:		
<ul style="list-style-type: none"> • Audio recordings of our conversation 	To keep our clients and colleagues safe and for training purposes.	In our secure data storage systems.

Andium Homes may hold Special Category (sensitive) Personal Data on some of our Clients or those residing in our properties, including health or medical information, or about actual or potential criminal or enforcement activity, where this is shared with us by other safe-guarding and enforcement public bodies or as part of our duties as a Scheduled Public Authority under the Law.

Andium Homes may also retain certain personal data or special category personal data in order to fulfil our responsibilities under the Residential Tenancy (Jersey) Law 2011 and for the performance of any tenancy agreement or contract we have with you.

We collect information in the following ways: -

We use the following means to collect your personal data:

- ✿ In person at our front of house reception in Don Street
- ✿ In person when starting or renewing a Tenancy
- ✿ In person at other locations when service requests are made directly to Andium Homes Staff
- ✿ On the telephone
- ✿ Via our website
- ✿ Via email
- ✿ Via social media
- ✿ Via text message

- ✚ In writing
- ✚ On the telephone, via email, in writing or in person to our Contracted Partners

We store information in the following ways:

Hard copy:

- ✚ Application forms
- ✚ Tenancy Agreements
- ✚ Service request forms
- ✚ Gateway applications
- ✚ Credit check data
- ✚ Feedback forms

Digital

In our Housing and Financial Management Software

- ✚ Contact information and contact records
- ✚ Client contact enquiries, actions and records
- ✚ Maintenance service requests
- ✚ Allocation Requests
- ✚ Rental and Purchase Application Requests and Enquiries
- ✚ Rent Accounting details including arrears
- ✚ Purchase and Invoicing records
- ✚ Management Reports
- ✚ Complaints

In our Document Management Software:

- ✚ Rent Accounting details
- ✚ Management Reports
- ✚ Records of any special category data matters such as safe-guarding or enforcement

How We Use Your Personal Data (Legal Basis for Processing)

Andium Homes takes your privacy very seriously and will never disclose or share your data without your consent, unless required to do so by law. We only retain your data for as long as is necessary and for the purposes specified in this privacy notice.

Where you have consented to us providing you with discretionary services, you are free to withdraw consent at any time.

The purposes and reasons for processing your personal data are detailed below: -

- ❖ Andium Homes will process Clients contact, housing status, rental history, credit check, identity and any supported housing information when you enter into a Tenancy Agreement and to renew or alter your Tenancy in accordance with the requirements of the Residential Tenancy (Jersey) Law 2011. We will highlight this privacy policy at the commencement or renewal of every Tenancy Agreement.
- ❖ Andium Homes will use your direct debit and bank account details, rental transactions and account details and contact information to arrange for you to be charged rent, and to make arrangements for the receipt of any income support or other benefits and in the event of arrears or debtor issues to arrange how your rent will be recovered. We will retain this in accordance with the Companies (Jersey) Law 1991, Residential Tenancy (Jersey) Law 2011 and the requirements of applicable financial standards. Consent will be sought to do so at the point of accepting a new or renewing a Tenancy Agreement.
- ❖ When Clients and others visit our offices, Andium Homes captures audio recordings of conversations at our reception desks. Andium Homes also records all telephone calls that Clients and others make to Andium Homes. This is so we can deal with complaints effectively, to keep our Clients and Colleagues safe, and to improve our services wherever feedback or quality assurance activities identify training requirements for our Colleagues. Visitors and callers will be made aware of the recording in place at the contact point. We also maintain a limited closed circuit television monitoring and access control monitoring at our premises and on certain land for the purposes of crime prevention.
- ❖ Our maintenance contractors will use the contact data provided by you to Andium Homes, to undertake any response repairs you request, and to undertake void renewals, planned maintenance and other maintenance services required to maintain the property in line with the Tenancy Agreement. Andium Homes will provide our maintenance contractors with schedules of where two person visits are required. This may be because the Clients concerned are vulnerable from a safe-guarding perspective, or have been assessed by Andium Homes or others as potentially violent, or may be in rent arrears and therefore will need to address this before discretionary services are provided and non-urgent repairs are completed. Our maintenance contractors may collect Client customer satisfaction survey data on Andium Homes' behalf, which may include your contact information, consent will be sought before doing so.
- ❖ Our parking contractor will use personal contact, vehicle and other data provided by you if you request a parking permit on Andium Homes land to process your application and provide the parking service in line with the requirements of the Removal of Vehicles (Private Land) (Jersey) Regulations 2016. This is to provide the most efficient parking service to our Clients and customers. Consent to process this data will be sought at the point of requesting the service.
- ❖ Andium Homes will collect and hold personal data where required elsewhere to do so under an enactment and where we have a duty as a Scheduled Public Authority under the Law. This may include personal data associated with health and safety requirements, safety monitoring and related to insurance claims. This is so Andium Homes can demonstrate compliance with the Law concerned.

- ❖ Andium Homes may hold contact details where you make complaints, feedback and compliments, contribute to our web-site or social media forums, or respond to our surveys. Andium Homes may use your personal data for undertaking quality assurance tests to improve the service we provide to our Clients. This enables us to continually improve the service we provide to Clients, partners and others customers.
- ❖ Andium Homes will hold personal data where required to do so to fulfill contracts. Consent will be sought either during development or commencement of these contractual arrangements. Andium Homes may hold personal data of suppliers and contractors to enable us to raise orders, invoices and undertake payments. This is necessary to meet the legal requirements upon a Limited Company. We will also share personal data with Income Tax, Social Security and Rates Authorities to meet the financial requirements of the States of Jersey Government under our Transfer Agreement, Memorandum of Understanding and the Companies (Jersey) Law (1991).
- ❖ Andium Homes contracts with local data suppliers to provide secure data storage and via these local suppliers to provide secure cloud-based storage and back-up of all data including personal data and special category personal data. Any personal data processed by Andium Homes as described above will also be stored in these data storages. This may include transfer to virtual machines in countries within the European Economic Area. This is necessary to enable a secure and efficient service is provided to Clients and stakeholders.
- ❖ Andium Homes and our suppliers providing human resource related contracts, will collect personal data relating to the Colleagues employed by Andium Homes, including contact details, bank details, income tax, pension and social security status, payment records, professional references, job-related medical data, performance and appraisal data. This is to ensure that our Colleagues are suitable, competent and safe and employed appropriately. Employees will be asked to give consent by entering into an employment contract with Andium Homes.
- ❖ Andium Homes takes your privacy seriously and will only process your personal data with your consent or in accordance with the terms stated in our Privacy Policy.

Your Rights

You have the right to access any personal information that Andium Homes processes about you and to request information about: -

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source of the data.

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to update/correct it as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing in accordance with data protection laws, as well as to object to any direct marketing from us and to be informed about any automated decision-making that we use.

Consequences of Not Providing Your Data

All Clients are obligated to provide personal data in order to enter a Tenancy Agreement or when requesting any discretionary service.

Please note that if you refuse consent to process your personal data, this would not invalidate the terms of your Tenancy Agreement as Andium Homes would need to hold certain personal data in order to provide necessary services under your Tenancy Agreement.

However, if you refuse consent at the point of accessing a discretionary service, for example, parking permits, this service cannot be provided to you.

We keep your personal data safe and secure and so would strongly encourage you to give consent to provide you service.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the relevant request; this is to ensure that your data is protected and kept secure.

Sharing and Disclosing Your Personal Information

We do not share or disclosure any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement. Andium Homes uses the following third-party/third-parties to provide the below services and business functions, however all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures.

Company Name	Processing Role for Andium Homes	Personal Data Processed	Legitimate basis for processing	Privacy Notice or Data Protection Contact
<i>A1 Property Services Limited</i>	Response Repair Contract All trades	<i>Client Contact Details and Addresses</i>	<i>Contractual Obligation</i>	<i>01534 746696</i>
<i>Advanced Heating</i>	Legionella testing and inspections	<i>Client Contact Details and Addresses</i>	<i>Contractual Obligation</i>	www.advancedheating.je
<i>Aareon UK Ltd</i>	<i>Housing Management and Finance System Service Level Agreement</i>	<i>Remote access to client data</i>	<i>Contractual Obligation</i>	www.aareon.co.uk
<i>AFM</i>	Response Repair Contract Mechanical And Electrical	<i>Client Contact Details and Addresses</i>	<i>Contractual Obligation</i>	www.amalgamatedfm.com
<i>Alex McAulay Decorators Limited</i>	Decoration Service Level Agreement	<i>Client Contact Details and Addresses</i>	<i>Contractual Obligation</i>	www.alexmauleypainters.com
<i>Apogee</i>	<i>Managed Print Service Level Agreement</i>	<i>Printing of personal information</i>	<i>Contractual Obligation</i>	www.apogeecorp.com
ASL Recruitment	Recruitment Consultant	Colleague personal information	Contractual Obligation	www.asl-jersey.co.uk
<i>Azure Desk</i>	<i>Service Desk</i>	<i>Colleague and supplier personal information</i>	<i>Contractual Obligation</i>	www.azure.microsoft.com
Baker Tilly Channel Islands Ltd	Engagement of auditors	Client, supplier and colleague contact details and addresses	Legal obligation	www.bakertillyci.co.je

Company Name	Processing Role for Andium Homes	Personal Data Processed	Legitimate basis for processing	Privacy Notice or Data Protection Contact
<i>C5 Alliance</i>	<i>Managed Support Information Technology Service Level Agreement</i>	<i>Colleague and supplier personal information</i>	<i>Contractual Obligation</i>	www.c5alliance.com
<i>Calton Limited</i>	<i>Kitchen and Bathroom Installation Package A</i>	<i>Client Contact Details and Addresses</i>	<i>Contractual Obligation</i>	<i>01534 525252</i>
	<i>Voids Contract Package A</i>	<i>Client Contact Details and Addresses</i>	<i>Contractual Obligation</i>	
	<i>Decoration Service Level Agreement</i>	<i>Client Contact Details and Addresses</i>	<i>Contractual Obligation</i>	
<i>Camerons Limited</i>	<i>Summerland Development Project</i>	<i>Client Contact Details and Addresses</i>	<i>Contractual Obligation</i>	www.camerons.je
	<i>Ann Court Development</i>	<i>Client Contact Details and Addresses</i>	<i>Contractual Obligation</i>	
	<i>Windsor Court</i>	<i>Client Contact Details and Addresses</i>	<i>Contractual Obligation</i>	
	<i>Convent Court High Rise</i>	<i>Client Contact Details and Addresses</i>	<i>Contractual Obligation</i>	
<i>Castleton Technology</i>	<i>Electronic Document Management</i>	<i>Remote access to client data</i>	<i>Contractual Obligation</i>	www.castletonplc.com
<i>Collas Crill</i>	<i>Engagement of lawyers</i>	<i>Client Contact Details and Addresses</i>	<i>Legal obligation</i>	www.collascrill.com
<i>Complete Facilities</i>	<i>GM and C Packages East and West</i>	<i>Client Contact Details and Addresses</i>	<i>Contractual Obligation</i>	www.completefacilitiesjersey.com
<i>Computer Protec Systems</i>	<i>Closed Circuit Television Don Street</i>	<i>CCTV Footage</i>	<i>Contractual Obligation</i>	www.computerprotec.co.je

Company Name	Processing Role for Andium Homes	Personal Data Processed	Legitimate basis for processing	Privacy Notice or Data Protection Contact
<i>G4S Secure Solutions Limited</i>	<i>Parking Management Contract</i>	<i>Processing of permit applications</i>	<i>Contractual Obligation</i>	www.gfs.uk.com/en/who-we-are/jersey
<i>G R Langois Ltd</i>	Samares Development	<i>Client Contact Details and Addresses</i>	<i>Contractual Obligation</i>	www.Grlangois.co.uk
<i>Hacquoil and Cook Limited</i>	Le Squez Phase 4 Development Project	<i>Client Contact Details and Addresses</i>	<i>Contractual Obligation</i>	www.hacquoilandcook.com
	La Collette Low Rise	<i>Client Contact Details and Addresses</i>	<i>Contractual Obligation</i>	01534 483823
<i>JD and BMC</i>	Decoration Service Level Agreement	<i>Client Contact Details and Addresses</i>	<i>Contractual Obligation</i>	07797 783746
<i>Jersey Gas</i>	Heating Maintenance (Wet)	<i>Client Contact Details and Addresses</i>	<i>Contractual Obligation</i>	www.jsygas.com
<i>Jersey Telecom</i>	<i>Mitel Telephony</i>	<i>Voice data</i>	<i>Contractual Obligation</i>	www.itglobal.com
<i>JMEC</i>	Kitchen and Bathroom Installation Package B	<i>Client Contact Details and Addresses</i>	<i>Contractual Obligation</i>	www.imecltd.com
	Emergency Lighting and AOV Testing and Upgrades	<i>Client Contact Details and Addresses</i>	<i>Contractual Obligation</i>	
	Voids Contract Package B	<i>Client Contact Details and Addresses</i>	<i>Contractual Obligation</i>	
	Decoration Service Level Agreement	<i>Client Contact Details and Addresses</i>	<i>Contractual Obligation</i>	
<i>Law at Work</i>	Engagement of Law at Work	Colleague contact details and addresses	<i>Contractual Obligation</i>	www.lawatworkci.com
<i>M-Science</i>	<i>SMS Texting</i>	<i>Text data</i>	<i>Contractual Obligation</i>	www.msscience.com

Company Name	Processing Role for Andium Homes	Personal Data Processed	Legitimate basis for processing	Privacy Notice or Data Protection Contact
<i>Normans</i>	Kitchen Supply	<i>Client Contact Details and Addresses</i>	<i>Contractual Obligation</i>	www.normans.je
R.A.Rossborough (Insurance brokers) Limited	Insurance Advisors to the States of Jersey (Andium noted as an additional insured)	<i>Client and Colleague Contact Details and Addresses</i>	<i>Legal Obligation</i>	www.rossborough.co.uk
<i>ROK Construction</i>	Boiler House Site	<i>Client Contact Details and Addresses</i>	<i>Contractual Obligation</i>	www.roklimited.je
<i>States of Jersey - Department for Infrastructure</i>	Cleaning Contract	<i>Client Contact Details and Addresses</i>	<i>Contractual Obligation</i>	www.gov.je/Government/Departments/TransportTechnicalServices
States of Jersey - Payroll Service	Payroll Service Level Agreement	*	Contractual obligation	www.gov.je/Government/Departments/TreasuryResources
<i>Techincare</i>	Maintenance of Hoists, private lifts and tracks	<i>Client Contact Details and Addresses</i>	<i>Contractual Obligation</i>	www.techincare-jersey.com
Vantage HBA	Remuneration Advisory Agreement.*	*	*	www.vantage-hba.co

Safeguarding Measures

Andium Homes takes your privacy seriously and we take every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place. We have accreditation to the Cyber Essentials™ information security standard.

Andium Homes shares data where required to do so with the following safeguarding and legal agencies:

- The Jersey Multi-Agency Risk Assessment Conference
- The Multi Agency Safeguarding Hub
- The Jersey Multi-Agency Public Protection Arrangements
- The States of Jersey Police
- The States of Jersey Viscounts Department
- The States of Jersey Customs and Immigration Service

Andium Homes receives data from the following agencies in order to meet our obligations to pay Income Support or allocate homes in accordance with the requirements of the Affordable Housing Gateway:

- The Department for Social Security
- The Department for Community and Constitutional Affairs.

The data shared is limited to that Andium Homes holds under our obligations or requirements of the Residential and Tenancy (Jersey) Law (2011) but may also include Special Category Personal Data relating to actual or suspected criminal activity, health status or sexual orientation where this information is provided to us by others.

How Long We Keep Your Data

Andium Homes only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. We are required under Jersey Law to keep any financial related personal data (*name, address, contact details, payments or debts*) for a minimum of 10 years after which time it will be destroyed. All other categories of personal data have retention periods linked to either legal requirements, codes of good practice or business requirement following your consent.

Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

Surveys and Feedback

Occasionally, **Andium Homes** would like to contact Clients and potential customers with surveys or feedback request relating to the service we currently provide or may wish to provide. If you consent to us using your contact details for these purposes, you have the right to modify or withdraw your consent at any time by using the opt-out/subscribe options or by contacting **Andium Homes** directly.

Lodging a Complaint

Andium Homes only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

Andium Homes Limited

The Data Protection Officer
33-35 Don Street
St Helier
Jersey
JE2 4TQ.
Telephone: 01534 500700
Email: dpo@andiumhomes.je

Data Protection Authority

Brunel House
Old Street
St Helier
Jersey
JE2 3RG.
Telephone : 01534 716530
Email enquiries@oicjersey.org
Website: <https://oicjersey.org/online-enquiry/#/complain/form>