

## Privacy Notice

### Who We Are

**Andium Homes Limited** is a Company Limited by Guarantee and Jersey's largest provider of Affordable Housing. We are wholly owned by the Government of Jersey but operate at Arm's Length with our own independent Board of Directors.

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.

Our 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 can be contacted at [dpo@andiumhomes.je](mailto:dpo@andiumhomes.je).

We are registered with the Data Protection Authority's Register of Data Controllers under registration number 16312.

The Data Protection Authority is the Jersey Office of the Information Commissioner (ICO) they can be contacted at [enquiries@oicjersey.org](mailto:enquiries@oicjersey.org)

**Andium Homes** (*'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 (the Law) 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.

## **Your Data Protection Rights**

Under the Law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at [dpo@andiumhomes.je](mailto:dpo@andiumhomes.je) if you wish to make a request.

## **Information That We Collect**

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

### **Consequences of Not Providing Your Data**

All Clients are obligated to provide a minimal amount of personal data to enter a Tenancy Agreement. Certain discretionary services also require the provision of certain specified personal information detailed in this Privacy Notice.

Please note that if you refuse consent for us to process your personal data, this will not invalidate the terms of your Tenancy Agreement as Andium Homes is permitted 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, when applying for a parking permit, we would then not be able to provide this service to you.

We keep your personal data safe and secure and so would strongly encourage you to give consent to us to hold your data so that we can provide those services.

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.

**How Long We Keep Your Data**

We only ever retain personal information for as long as is necessary. We have strict review and retention policies in place to meet these obligations. We are required by Article 104(4) Companies (Jersey) Law 1991 to keep personal data and supporting documents relating to financial transactions (*e.g 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.

**The personal data that we may collect from you, why we collect it, how long we retain it and how we destroy it is set out below: -**

| <b>What data we may hold about you</b>   | <b>Lawful basis for processing personal data &amp; processing activity - (Why we need it)</b>  | <b>How it is held</b>  | <b>How long it is held for</b>   | <b>How your information will be disposed of</b>   |
|--|--|--|--|---|
| <b>Your tenancy:</b>   |  |  |  |   |
| <ul style="list-style-type: none"> <li>• Your contact and identification information and that of your household members including children.</li> <li>• A summary of each contact with you.</li> <li>• The conduct of your tenancy, including rent payments, rent arrears and other payments.</li> <li>• Your complaints and compliments.</li> <li>• Your responses to our surveys.</li> <li>• Your rent account details and payment history.</li> <li>• Your Direct Debit and Bank Account details.</li> </ul> | <p>Contract Performance / Consent / Legitimate Interest / Public Functions</p> <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, Rates Law Companies (Jersey) Law 1991 .</p> <p>To allow us to undertake property inspections, whether ourselves or with our contractors or appointed consultants.</p> | <p>A hard copy of your tenancy agreement will be held in our secure structured filing system.</p> <p>In our customer relationship database or an approved secure contractor database.</p> <p>In our secure Document Management System.</p> | <p>For the length of your tenancy, plus up to 10 years thereafter, except in instances where there are unresolved legal proceedings where we will hold the data until the proceedings are concluded.</p> | <p>Digital records will be deleted from systems and hard copy records securely destroyed.</p> |

| What data we may hold about you   | Lawful basis for processing personal data & processing activity - (Why we need it)  | How it is held   | How long it is held for   | How your information will be disposed of  |
|---|---|--|---|---|
| <ul style="list-style-type: none"> <li>• Standing Order forms and other bank correspondence provided by you or your bank;</li> <li>• Benefit entitlements and related correspondence</li> <li>• Website survey or service requests.</li> <li>• Registration card;</li> <li>• Social Security number as a unique identifier</li> <li>• Photographic ID;</li> <li>• Legal documents.</li> <li>• Your rental transactions.</li> <li>• Details of debtors and arrears.</li> </ul> | <p>To ensure we know your rent is paid correctly.</p> <p>For safeguarding activities in our role as an 'Administration of the States' under the Children's (Jersey) Law 2002, as a Corporate Parent under the Children and Young People (Jersey) Law 2022, and through our membership of the Safeguarding Partnership Board and participation in various multi-agency safeguarding forums, such as Multi Agency Public Protection Arrangements and Multi Agency Risk Assessment Conferences, we may be required to share information with other agencies.</p> |  |   |   |
| <b>When you bid for a property using our Choice Based Lettings System:</b>  |   |  |   |   |
| <ul style="list-style-type: none"> <li>• Your contact and identification information and that of your household members including children.</li> <li>• A summary of each contact with you.</li> <li>• Your Gateway reference number</li> </ul>  | <p>Legitimate Interests / Performance of a Public Task / Consent</p> <p>To ensure that we can allocate housing to those in most need in accordance with the Affordable Housing Gateway and relevant legislation.</p>  | <p>In our customer relationship database or an approved secure contractor database.</p> <p>In our secure</p> | <p>Until you enter into a tenancy or you ask us to remove you from our records.</p> | <p>Digital records will be deleted from systems and hard copy records securely destroyed.</p> |

| What data we may hold about you  | Lawful basis for processing personal data & processing activity - (Why we need it)  | How it is held   | How long it is held for   | How your information will be disposed of  |
|--|---|--|---|---|
| <ul style="list-style-type: none"> <li>Your housing preferences</li> </ul>   | <p>To comply with the Control of Housing &amp; Work (Jersey) Law 2012.</p>  | <p>Document Management System.</p>   |   |   |
| <b>When entering into a new tenancy:</b>   |   |  |   |   |
| <ul style="list-style-type: none"> <li>Your means of identification.</li> <li>Your housing status.</li> <li>Credit check information.</li> <li>Addition housing requirements including, medical adaptation requirements or support needs.</li> </ul> | <p>Contract Performance / Legitimate Interests / Performance of a Public Task / Consent</p> <p>To allocate housing to those in most need in accordance with the Affordable Housing Gateway and relevant legislation.</p> <p>To ensure that new tenants are allocated the right sort of home and where necessary adaptations or support is provided;</p> <p>To comply with the Control of Housing &amp; Work (Jersey) Law 2012</p> | <p>Some older tenancies are held in our hard copy files. Others are stored in our secure document management database.</p> | <p>For the duration of your tenancy plus 12 months</p>                          | <p>Digital records will be deleted from systems and hard copy records securely destroyed.</p> |
| <b>Your rent account:</b>  |   |  |   |   |
| <ul style="list-style-type: none"> <li>Your rent account details and enquiries.</li> <li>Direct Debit and Bank Account Details.</li> </ul>   | <p>Contract Performance / Legitimate Interests /</p> <p>To properly record financial transactions between us and</p>  | <p>In our secure customer relationship database.</p>   | <p>For the length of your tenancy, plus 10 years, except in instances where</p> | <p>Digital records will be deleted from systems and hard copy records securely</p>            |

| What data we may hold about you  | Lawful basis for processing personal data & processing activity - (Why we need it)   | How it is held                            | How long it is held for   | How your information will be disposed of   |
|--|--|---|---|--|
| <ul style="list-style-type: none"> <li>Your rental and other financial transactions.</li> <li>Details of debtors and arrears.</li> </ul>   | provide an accurate balance of your account with us and to comply with Article 104(4) of the Companies (Jersey) Law 1991.  | In our secure Document Management System. | there are unresolved legal proceedings where we will hold the data until the matter is resolved.  | destroyed.   |
| <b>Our parking contractor may hold:</b>  |  |   |   |  |
| <ul style="list-style-type: none"> <li>Your parking permit requests and correspondence.</li> <li>Details of vehicle registration and ownership.</li> <li>Details of all enforcement action.</li> </ul> | <p>Contract Performance / Legal Obligation / Legitimate Interests / Consent.</p> <p>To provide efficient parking services for you.</p> <p>To comply with the relevant parking regulations.</p> | In the contractor's secure database.      | <p>Records of permit applications will be held for a period of 12 months after permit expiry or 6 months should the application not be approved. Vehicle ownership records obtained from Driver &amp; Vehicle Standards will be retained for a maximum period of 12 months as required under the removal law.</p> <p>Vehicle impound, release and</p> | <p>Digital records will be deleted from systems and hard copy records securely destroyed.</p> <p>This is an automated process that is built into the software - unless the contractor places an exemption on the system to retain some details (deaths of owner etc) where the process may take it over the retention periods above, but the</p> |

| What data we may hold about you   | Lawful basis for processing personal data & processing activity - (Why we need it)   | How it is held   | How long it is held for   | How your information will be disposed of  |
|---|--|--|---|---|
|   |  |  | disposal records will be retained for a maximum period of 12 months as required by the Motor Vehicles (Removal from Private Land) (Jersey) Law & Regulations 2019, except in instances where there are unresolved legal proceedings where we will hold the data until the matter is resolved. | details are still required to be compliant with the relevant legislation.                     |
| <b>Our Maintenance Contractors may hold:</b>  |  |  |   |   |
| <ul style="list-style-type: none"> <li>• Your contact information</li> <li>• Work orders historically logged against the property.</li> <li>• Your requests for maintenance services and their management.</li> <li>• Your responses to customer satisfaction surveys.</li> </ul> | <p>Contract Performance / Legitimate Interests</p> <p>To provide maintenance services as efficiently as possible.</p> <p>To keep you and contractors safe.</p> | <p>Digital documents, password protected and controlled.</p> <p>In our secure customer relationship database or an</p> | <p>Property maintenance records are retained for 10 years.</p>  | <p>Digital records will be deleted from systems and hard copy records securely destroyed.</p> |



| What data we may hold about you  | Lawful basis for processing personal data & processing activity - (Why we need it)   | How it is held   | How long it is held for   | How your information will be disposed of  |
|--|--|--|---|---|
| <ul style="list-style-type: none"> <li>Repairs required under defect liability periods for newly built and refurbished property.</li> </ul>  |  | approved secure contractor database.   |   |   |
| <b>When applying to join Assisted Purchase Pathway</b>   |  |  |   |   |
| <p>Your application detail which will include:</p> <ul style="list-style-type: none"> <li>Name and personal details such as current address, contact details, date of birth and Social Security number.</li> <li>Number of household members including dependents.</li> <li>Contact information</li> <li>Financial information – household income and savings</li> <li>Level of housing need – e.g. bedroom requirement and any additional housing requirements, including any relevant medical issues.</li> </ul> | <p>Contract Performance / Legal Obligation / Performance of a Public Legitimate Interests</p> <p>Public Functions</p> <p>In order to process your application and assess eligibility</p> <p>To be able to means test your financial circumstances and advise on assisted purchase options.</p> <p>Administration of any bond charge against the property.</p> <p>Administration of the resident's association.</p> | <p>In our customer relationship database.</p> <p>In our secure Document Management System.</p> | <p>Until you have no relationship with us specifically no bond arrangement in place and are not party to a resident's association where Andium retains a material interest.</p> | <p>Digital records will be deleted from systems and hard copy records securely destroyed.</p> |

| What data we may hold about you  | Lawful basis for processing personal data & processing activity - (Why we need it)  | How it is held   | How long it is held for  | How your information will be disposed of   |
|--|---|--|--|--|
| <b>When purchasing a property from us</b>  |   |  |  |  |
| Personal details including: <ul style="list-style-type: none"> <li>▪ Name and personal details such as current address, contact details, date of birth and Social Security number.</li> <li>▪ Name and personal details of spouse/civil partner/adult household members if joint application.</li> <li>▪ Contact information</li> <li>▪ Financial information – household income and savings; mortgage assessments</li> <li>▪ Mortgage provider</li> <li>▪ Appointed Lawyer</li> </ul> | Contract Performance / Legal Obligation / Performance of a Public Task / Legitimate Interests<br><br>To enter into a contract of purchase.<br><br>In order to instruct lawyers to act on our behalf | In our customer relationship database.<br>In our secure Document Management System.                  | Until you have no relationship with us specifically no bond arrangement in place and are not party to a resident's association where Andium retains a material interest. | Digital records will be deleted from systems and hard copy records securely destroyed. |
| <b>When applying to join the Partnership Pathway waiting list (formerly known as the Supported Housing Group)</b>  |   |  |  |  |
| Your application detail which will include: <ul style="list-style-type: none"> <li>• Name and personal details of primary applicant such as current address &amp; DOB</li> <li>• Name and personal details of the professional/agency who is</li> </ul>  | Contract Performance / Legal Obligation / Performance of a Public Task / Legitimate Interests<br><br>In order to process your application and assess eligibility                                    | The basic details of your application (Name, DOB, contact details, size of property required, agency | Until you enter into a tenancy or if we have no contact with you or your supporting agency / delegate  | Digital records will be deleted from systems and hard copy records securely destroyed. |

| What data we may hold about you   | Lawful basis for processing personal data & processing activity - (Why we need it)   | How it is held   | How long it is held for | How your information will be disposed of |
|---|--|--|-------------------------|--|
| <p>supporting your application</p> <ul style="list-style-type: none"> <li>• Name and personal details of legally appointed Delegate, if applicable</li> <li>• Contact information</li> <li>• Financial information – household income and savings;</li> <li>• Level of housing need – e.g. bedroom requirement</li> <li>• Name &amp; contact details of agencies/professionals which are relevant to assessing your housing need -e.g. care provider, social worker, key worker etc</li> <li>• Medical information that is relevant to assessing your housing need – e.g., Occupational Therapist assessment</li> <li>• Information relating to any risks associated to your application, personal or social circumstances – e.g. vulnerable to exploitation, self-neglect, victim of a crime or perpetrator of a criminal offence</li> </ul> | <p>To ensure you are offered an appropriate home</p> <p>Assess and share risk with other agencies who may be supporting you</p> <p>For safeguarding activities and assessing children and young people's housing needs in our role as an 'Administration of the States' under the Children's (Jersey) Law 2002, as a Corporate Parent under the Children and Young People (Jersey) Law 2022,</p> | <p>supporting your application and why you are applying will be recorded on a centralised data base (Affordable Housing Gateway) that is administered by Customer &amp; Local Services. Both Personal and sensitive data will be stored in our secure customer relationship database.</p> <p>In our secure document management database.</p> | <p>for 2 years.</p>     |  |

| What data we may hold about you   | Lawful basis for processing personal data & processing activity - (Why we need it)   | How it is held   | How long it is held for   | How your information will be disposed of  |
|---|--|--|---|---|
| <b>We and our Insurers may hold:</b>  |  |  |   |   |
| <ul style="list-style-type: none"> <li>• Accident records including any relevant medical data.</li> </ul>   | <p>Legal Obligation / Legitimate Interests</p> <p>To aid investigation and to administer insurance claims.</p>   | <p>Digital documents, stored in encrypted databases.</p> | <p>Retained for 3 years from the date the record is created; or 3 years after the injured parties 18<sup>th</sup> birthday. In the event of an ongoing legal issue or insurance claim for 3 years after the claim is concluded.</p> | <p>Digital records will be deleted from systems and hard copy records securely destroyed.</p> |
| <b>When you visit our Don Street Offices we may hold:</b>   |  |  |   |   |
| <ul style="list-style-type: none"> <li>• A record of your visit on our Client Contact Management System</li> <li>• Audio recordings of your visit.</li> <li>• Closed circuit television recordings of your visit.</li> <li>• Back-ups of all the above data.</li> </ul> | <p>Legal Obligation / Performance of a Public Function / Legitimate Interest</p> <p>To keep our clients and colleagues safe and for training purposes.</p> | <p>In our secure data storage systems.</p>               | <p>Contact records are retained indefinitely</p> <p>Audio recordings from our phone system are retained for a maximum of 7 days unless required to deal with a complaint or for law</p>   | <p>Digital recordings will be deleted</p>   |

| What data we may hold about you  | Lawful basis for processing personal data & processing activity - (Why we need it)  | How it is held  | How long it is held for  | How your information will be disposed of  |
|--|---|---|--|---|
|  |   |   | <p>enforcement purposes.</p> <p>CCTV recordings of visits to our offices are retained for 7 days unless required to deal with a complaint or for law enforcement purposes.</p> |   |
| <p><b>When we meet you with at your home or at any place outside our offices:</b></p>  |   |   |  |   |
| <ul style="list-style-type: none"> <li>• A record of your visit on our Client Contact Management System</li> <li>• Back-ups of all that data.</li> <li>• Audio recordings of our interaction with you at any point where colleagues consider it necessary to maintain their or your Health &amp; Safety.</li> <li>• Records of visits through our lone worker procedures and lone worker monitoring systems</li> </ul> | <p>Contract Performance / Legal Obligation / Legitimate Interests</p> <p>To meet our legal obligations under the Health &amp; Safety (Jersey) Law</p> <p>To keep our clients and colleagues safe and for training purposes.</p> <p>To support any client complaints or legal action by the company under its acceptable behaviour policy.</p> | <p>In our customer relationship database</p> <p>In our secure document management database.</p> <p>Audio records held by our partner 'Reliance Protect'</p> | <p>CRM records retained indefinitely</p> <p>Audio and CCTV recordings held for 7 days as a routine, unless subject to complaint or investigation.</p>                          | <p>Digital records will be deleted from systems and hard copy records securely destroyed.</p> |

| What data we may hold about you   | Lawful basis for processing personal data & processing activity - (Why we need it)  | How it is held                              | How long it is held for   | How your information will be disposed of  |
|---|---|---|---|---|
|   |   |   |   |   |
| <b>When we speak to you on the phone:</b>   |   |   |   |   |
| <ul style="list-style-type: none"> <li>• A record of your call on our Client Contact Management System</li> <li>• Audio recordings of our conversation</li> </ul> | <p>Contract Performance / Legal Obligation / Legitimate Interests</p> <p>To keep our clients and colleagues safe and for training purposes.</p> | <p>In our secure data storage systems.</p>  | <p>CRM records retained indefinitely</p> <p>Audio recordings on our telephone system are retained for a maximum of 7 days unless required to deal with a complaint or for law enforcement purposes.</p> | <p>Digital records will be deleted from systems and hard copy records securely destroyed.</p> |
| <b>When you visit our land, sites or buildings</b>  |   |   |   |   |
| <ul style="list-style-type: none"> <li>• Closed circuit television recordings of your visit</li> </ul>  | <p>Legitimate Interests</p> <p>For the prevention of crime</p>  | <p>On approved secure recording devices</p> | <p>CCTV recordings are retained for 7 days unless required to deal with a complaint or for law enforcement purposes.</p>  | <p>Automatically deleted after 7 days as systems overwrite</p>                                |

| What data we may hold about you   | Lawful basis for processing personal data & processing activity - (Why we need it)                 | How it is held  | How long it is held for | How your information will be disposed of   |
|---|--|---|-------------------------|--|
|   |  |   |                         |  |
| <b>When you make a Freedom of Information Request</b>   |  |   |                         |  |
| <ul style="list-style-type: none"> <li>Your contact information, including postal address, email and telephone numbers</li> <li>Your means of identification</li> </ul> | <p>To comply with the Freedom of Information Law</p> <p>To comply with the Data Protection Law</p> | <p>In our customer relationship database</p> <p>In our secure document management database.</p> | 5 years                 | Digital records will be deleted from systems and hard copy records securely destroyed. |

**Andium Homes** may hold Special Category (sensitive) Personal Data on persons 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 personal information from you in the following ways: -***

- During any contact we have with you;
- When you participate in our Choice Based Lettings Service;
- When starting or renewing a Tenancy;
- When you apply to join the Assisted Purchase Pathway;
- When you apply to join the Partnership Pathway
- When you make any request of us or anyone acting for us;
- When you access our repairs service;

- When you access any discretionary service that we provide;
- On the telephone;
- Via our website;
- Via email;
- Via social media;
- Via text message or text-based messaging services;
- In writing;
- On the telephone, via email, in writing or in person when you have contact with anyone acting on our behalf;
- Via our Andium@Home Application, Client Web Portal and website generally;
- Via Third Party Agencies that may be providing support to tenants;

We store your personal information in the following ways:

**Hard copy:** In our secure filing room

- Signed Tenancy Agreements & Condition Reports

**Digital versions:**

In our Housing and Financial Management & Contact Management Systems

- Contact information and contact records;
- Client contact enquiries, actions, outcomes and records;
- General tenancy related correspondence;
- Third party authority records;
- Banking information and direct debit instructions;
- Maintenance service requests;
- Allocation requests including expressions of interests on our Choice Based Lettings system;
- Rental and Purchase Application related correspondence
- Rent Accounting details including arrears and debt recovery activity
- Purchase and Invoicing records
- Management Reports
- Complaints



### **In our Document Management Systems:**

- Application forms
- Partnership Pathway application form and documentation
- Tenancy Agreements
- Condition Reports
- General Correspondence
- Service request forms
- Gateway applications
- Credit check data
- Feedback forms
- Rent Accounting details and payment arrangements
- Management Reports
- Records of any special category data matters such as safe-guarding or enforcement

### **In our CCTV systems:**

- Closed Circuit Television Recordings

### **In our Telephony System**

- Audio Recordings of telephone calls made to us and made by us

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

**Andium Homes** takes your privacy very seriously and will only share or disclose your data where required by Law. We only retain your data for as long as is necessary and for the purposes specified in this privacy notice.

### **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.

In our role as an 'Administration of the States' under the Children's (Jersey) Law 2002, as a Corporate Parent under the Children and Young People (Jersey) Law 2022, and through our membership of the Safeguarding Partnership Board and participation in various multi-agency safeguarding forums, such as Multi Agency Public Protection Arrangements and Multi Agency Risk Assessment Conferences, we may be required to share information with other agencies, for instance at Child Protection Conferences or when required to participate in Serious Case Reviews..

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

- The Safeguarding Partnership Board
- 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 Jersey Viscounts Department
- The Jersey Customs and Immigration Service
- Customer and Local Services
- Environmental Health Section of the Government of Jersey, Growth, Housing and Environment Department
- The Department for Children, Young People, Education & Skills
- Department for Health and Community Services
- Department for Strategic Policy, Planning and Performance
- The Honorary Police Services in each of the 12 Parishes

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

- The Department for Customer and Local Services (Social Security).
- The Department for Strategic Policy, Planning and Performance (Affordable Housing Gateway).

### **Surveys and Feedback**

Occasionally, **Andium Homes** will 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.

### **Consent**

**Andium Homes** takes your privacy seriously and other than as required by Law, under the terms of a Tenancy Agreement, or otherwise in the Public Interest or on the basis of Legitimate Purpose, will only process your personal data with your consent. The legal basis we rely upon for processing each type of data is stated in this Privacy Policy and detailed in the table below.

Certain non-contractual services require that we process your personal data. If you are unwilling to provide that data or to give consent for us to process it, then regrettably it may be that we are unable to provide certain services to you.

### **Making 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 make a complaint to us or to the Jersey Office of the Information Commissioner.

#### **Andium Homes Limited**

The Data Protection Officer  
33-35 Don Street  
St Helier  
Jersey  
JE2 4TQ.

Telephone: 01534 500700

Email: [dpo@andiumhomes.je](mailto:dpo@andiumhomes.je)

Website: [www.andiumhomes.je](http://www.andiumhomes.je)

#### **Jersey Office of the Information Commissioner**

2nd Floor  
5 Castle Street  
St. Helier  
Jersey  
JE2 3BT

Telephone: 01534 716530

Email [enquiries@oicjersey.org](mailto:enquiries@oicjersey.org)

Website: [www.jerseyoic.org](http://www.jerseyoic.org)

## **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.

| <b>Company Name</b>             | <b>Processing Role for Andium Homes</b>   | <b>Personal Data Processed</b>                    | <b>Legal basis for processing</b> | <b>Privacy Notice or Data Protection Contact</b>                   |
|---------------------------------|---|---|-----------------------------------|--|
| Aareon UK Ltd                   | Housing Management and Finance System Service Level Agreement   | Remote access to client data                      | Legitimate Interests              | <a href="http://www.aareon.co.uk">www.aareon.co.uk</a>             |
| AFM                             | Response Repair Contract<br>Mechanical and Electrical<br>Legionella testing and inspections<br>Plant Maintenance contract<br>CCTV | Client Contact Details and Addresses              | Legitimate Interests              | <a href="http://www.amalgamatedfm.com">www.amalgamatedfm.com</a>   |
| Alex McAulay Decorators Limited | Decoration Service Level Agreement  | Client Contact Details and Addresses              | Legitimate Interests              | (01534) 854532   |
| Apogee                          | Managed Print Service Level Agreement   | Printing of personal information                  | Legitimate Interests              | <a href="http://www.apogeecorp.com">www.apogeecorp.com</a>         |
| Baker Tilly Channel Islands Ltd | Engagement of auditors  | Client and supplier contact details and addresses | Legitimate Interests              | <a href="http://www.bakertillyci.co.je">www.bakertillyci.co.je</a> |

|                  |  |  |  |  |
|------------------|--|--|--|--|
| BCR Law          | Engagement of lawyers  | Client Contact Details and Addresses                             | Legitimate Interests<br>Legal obligation       | <a href="http://www.bcrlawllp.com">www.bcrlawllp.com</a>                     |
| Bedell Cristin   | Engagement of lawyers  | Property Purchasers and client Contact Details and Addresses     | Legal obligation                               | <a href="http://www.bedellcristin.com">www.bedellcristin.com</a>             |
| C5 Alliance      | Managed Support Information Technology Service Level Agreement | Colleague and supplier personal information                      | Legitimate Interests                           | <a href="http://www.c5alliance.com">www.c5alliance.com</a>                   |
| Calton Limited   | Kitchen and Bathroom Installation Package A                    | Client Contact Details and Addresses                             | Contractual Obligation<br>Legitimate Interests | (01534) 525252   |
|                  | All Trades Response repairs                                    | Client Contact Details and Addresses                             | Contractual Obligation<br>Legitimate Interests |  |
|                  | Voids Contract Package A                                       | Client Contact Details and Addresses                             | Legitimate Interests                           |  |
|                  | Decoration Service Level Agreement                             | Client Contact Details and Addresses                             | Legitimate Interests                           |  |
| Carpets for you  | Carpet supplier  | Client Contact Details and Addresses                             | Legitimate Interests<br>Contractual Obligation | <a href="http://www.carpetsforyou ltd.co.uk">www.carpetsforyou ltd.co.uk</a> |
| Cashback Limited | Debt Recovery Agent  | Client Contact Details and addresses, nature of debt and balance | Legitimate Interests                           | <a href="http://www.cashback-jersey.com">www.cashback-jersey.com</a>         |

|   |   |   |  |  |
|---|---|---|--|--|
| Community Savings Bank  | Acting as tenants bank service                          | Rent account details, rent account number, amount of rent | Legitimate interests<br>Contractual obligation | <a href="http://www.communitysavings.org.je">www.communitysavings.org.je</a>   |
| Computer Protec Systems   | Closed Circuit Television Don Street                    | CCTV Footage  | Legitimate Interests                           | <a href="http://www.computerprotec.co.je">www.computerprotec.co.je</a>   |
| Complete Facilities LTD   | Cleaning Contract & Grounds maintenance                 | Client Contact Details and Addresses                      | Legitimate Interests                           | <a href="http://www.completefacilitiesjersey.com">www.completefacilitiesjersey.com</a>                                     |
| Currie & Brown  | Valuation Services                                      | Client Contact Details and Addresses                      | Legitimate Interests                           | <a href="http://curriebrown.com">Currie &amp; Brown - Construction &amp; cost management consultants (curriebrown.com)</a> |
| Dandara Jersey Limited and related Special Purpose Vehicle Companies. | Recently completed developments under defects warranty. | Client Contact Details and Addresses                      | Contractual Obligation                         | <a href="#">Jersey » Dandara</a>   |
| Drain IT Ltd  | Drainage contract                                       | Client Contact Details and Addresses                      | Legitimate Interests                           | <a href="http://www.drainit.je">www.drainit.je</a>   |
| G4S Secure Solutions Limited  | Parking Management Contract                             | Controllers and processors of permit applications         | Legitimate Interests<br>Consent                | <a href="http://www.g4s.com">www.g4s.com</a>   |
| G R Langlois Ltd  | Recently completed developments under defects warranty. | Client Contact Details and Addresses                      | Contractual Obligation                         | <a href="http://www.Grlanglois.co.uk">www.Grlanglois.co.uk</a>   |

|   |   |  |                        |  |
|---|---|--|------------------------|--|
| Grant Thornton Limited                              | Internal auditors                                       | Client, colleague and supplier contact details and addresses | Legitimate Interests   | <a href="http://www.grantthorntonci.com">www.grantthorntonci.com</a>           |
| Hacquoil and Cook Limited                           | Recently completed developments under defects warranty. | Client Contact Details and Addresses                         | Contractual Obligation | <a href="http://www.hacquoilandcook.com">www.hacquoilandcook.com</a>           |
| Huelin Homes  | Valuation Services                                      | Client Contact Details and Addresses                         | Legitimate Interests   | <a href="http://www.huelinhomes.com">www.huelinhomes.com</a>                   |
| Insurance Corporation of the Channel Islands (ICCI) | Insurance Broker  | Client contact details and addresses                         | Legitimate Interests   | <a href="http://www.insurancecorporation.com">www.insurancecorporation.com</a> |
| JD and BMC  | Decoration Service Level Agreement                      | Client Contact Details and Addresses                         | Legitimate Interests   | 07797 783746   |
| Jersey Electricity Company (JEBS)                   | Electrical works  | Client Contact Details and Addresses                         | Legitimate Interests   | <a href="http://www.jec.co.uk">www.jec.co.uk</a>                               |
| Island Energy                                       | Heating Maintenance (Wet)                               | Client Contact Details and Addresses                         | Legitimate Interests   | <a href="http://www.jsygas.com">www.jsygas.com</a>                             |
| Jersey Post   | Large scale mail deliveries                             | Client Names and Addresses                                   | Legitimate Interests   | <a href="http://www.jerseypost.com">www.jerseypost.com</a>                     |

|                                |   |                                      |  |  |
|--------------------------------|---|--------------------------------------|--|--|
| Jersey Telecom                 | Mitel Telephony   | Voice data                           | Legitimate Interests<br>Contractual Obligation | <a href="http://www.jtglobal.com">www.jtglobal.com</a>                   |
| JMEC                           | Kitchen and Bathroom Installation Package B             | Client Contact Details and Addresses | Legitimate Interests                           | <a href="http://www.jmecltd.com">www.jmecltd.com</a>                     |
|                                | Voids Contract Package B                                | Client Contact Details and Addresses | Legitimate Interests                           |  |
|                                | Decoration Service Level Agreement                      | Client Contact Details and Addresses | Legitimate Interests                           |  |
| Marsh                          | Government of Jersey's Insurance brokers                | Client contact details and addresses | Legitimate Interests                           | <a href="http://www.marsh.com">www.marsh.com</a>                         |
| Morley's Removals Limited      | Removals company appointed by Andium to support tenants | Client Contact Details and Addresses | Legitimate Interests<br>Consent                | <a href="http://www.morleysremovals.co.uk">www.morleysremovals.co.uk</a> |
| Esendex (previously M-Science) | SMS Texting   | Text data                            | Legitimate Interests                           | <a href="http://www.mscience.com">www.mscience.com</a>                   |
| Micron M&E Services Ltd        | Electrical works<br>Emergency Lighting                  | Client Contact Details and Addresses | Legitimate Interests                           | <a href="http://www.micron.je">www.micron.je</a>                         |
| Normans                        | Kitchen Supply  | Client Contact Details and Addresses | Legitimate Interests                           | <a href="http://www.normans.je">www.normans.je</a>                       |



|  |   |   |  |  |
|--|---|---|--|--|
| Petty Debts Court  | Enforcement   | Client Contact Details and Addresses and nature of debt and balance | Legitimate Interests                     | <a href="http://www.pettydebts.gov.je">Petty Debts Court (gov.je)</a>                                |
| Peter Green Builders   | Door Replacements                                       | Client Contact Details and Addresses                                | Legitimate Interests                     | (01534) 746146   |
| Queree Property Consultants  | Valuation Services                                      | Client Contact Details and Addresses                                | Legitimate Interests                     | <a href="https://queree.je/">https://queree.je/</a>  |
| Rateavon Jersey  | Building Repairs<br>Door Replacement                    | Client Contact Details and Addresses                                | Legitimate Interests                     | <a href="http://www.rateavon.je">www.rateavon.je</a>   |
| R.A.Rossborough (Insurance brokers) Limited                                  | Broker for PMI and Dental Provision                     | Client & colleague Contact Details and Addresses                    | Legitimate Interests                     | <a href="http://www.rossborough.co.uk">www.rossborough.co.uk</a>                                     |
| Reliance Protect   | Lone worker devices                                     | Colleague contact details, GPS location, Voice data                 | Legitimate Interests<br>Legal Obligation | <a href="http://www.relianceprotect.co.uk">www.relianceprotect.co.uk</a>                             |
| ROK Construct and ROK Holdings and related Special Purpose Vehicle Companies | Recently completed developments under defects warranty. | Client Contact Details and Addresses                                | Contractual Obligation                   | <a href="http://www.roklimited.je">www.roklimited.je</a>   |
| States of Jersey - Department for  | Cleaning Contract                                       | Client Contact Details and Addresses                                | Contractual Obligation                   | <a href="http://www.infrastructureandenvironment.gov.je">Infrastructure and Environment (gov.je)</a> |

|                  |   |   |                        |  |
|------------------|---|---|------------------------|--|
| Infrastructure   |   |   |                        |  |
| Techincare       | Maintenance of Hoists, private lifts and tracks | Client Contact Details and Addresses  | Contractual Obligation | <a href="http://www.techincare-jersey.com">www.techincare-jersey.com</a> |
| Thompson Estates | Valuation Services                              | Client Contact Details and Addresses  | Contractual Obligation | <a href="http://www.thompsonstates.com/">www.thompsonstates.com/</a>     |
| Telefitters Ltd  | TV/electrical works                             | Client Contact Details and Addresses  | Contractual Obligation | (01534) 528885   |
| Viberts          | Engagement of lawyers                           | Property Purchasers Contact Details and Addresses<br>Client Contact Details and Addresses | Legal obligation       | <a href="http://www.viberts.com">www.viberts.com</a>                     |