Privacy Notice

Chrysalis Group Services Limited ("Chrysalis Group") respects your privacy and is committed to protecting your Personal Data. This Privacy Notice will inform you as to how we look after your Personal Data, tell you about your privacy rights and how the law protects you.

Please make sure you read this Privacy Notice carefully to ensure you understand how and why we are using your data.

Chrysalis Group is made up of 6 companies which employ staff, these are: Chrysalis Group Services Limited; Chrysalis Supported Association Ltd; OPOKA CIO; Compass 2012 CIC; Touchstone Developments & Investments Ltd; Blackfields Furniture Ltd.

1.0 Purpose of this Privacy Notice

This Privacy Notice aims to give you information on how Chrysalis Group collects and processes your Personal Data.

Chrysalis Group Services Limited collects and processes your Personal Data on behalf of the organisation within the Group that you are employed by.

2.0 Contact details

2.1 Our full details are:

Full name of legal entity:	Chrysalis Group Services Limited
DPO contact:	dataprotection@chrysalisgroupservices.co.uk
Postal address:	3 Brook Office Park, Emersons Green, Bristol BS16 7FL
Telephone number:	0300 365 4040

3.0 What is Personal Data

3.1 Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

3.2 In simple terms, personal data is any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

4.0 Changes to Personal Data and your duty to inform us of changes

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.

5.0 Data Collection

5.1 We collect, use, store and transfer different categories of Personal Data about you which we have grouped together as follows:

- Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- Contact Data includes billing address, delivery address, email address and telephone numbers.
- Visual and Audio Data includes CCTV footage obtained at some of our properties, as well as the visual and/or audio recordings taken during use of our recording studio services.
- Financial Data includes bank account, payment card details, and payroll data.
- Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website or intranet.
- Profile Data includes your username and password on our website, our intranet, purchases or orders made by you, your preferences, and feedback and survey responses.
- Usage Data includes information about how you use our website, intranet, products and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- Special Categories of Data are details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). We may collect certain special categories of data and we may collect information about criminal convictions and offences due to the nature of our business.
- Questions, queries, and feedback left through the website

5.2 We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your Personal Data but is not considered Personal Data in law as this data does not directly or indirectly reveal your identity.

5.3 We collect and process data relating to employment for all companies within the group.

6.0 Failing to provide Personal Data

6.1 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 goods or services or employee benefits). 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.

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

6.2.1 Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, and e-mail or otherwise. This includes Personal Data you provide when you:

- apply for a tenancy or other services;
- create an account on our website;
- subscribe to our service or publications;
- request material to be sent to you;
- enter a promotion or survey;
- give us some feedback;
- provide unsolicited information to us;
- apply for employment with us or when you become an employee.

6.3 Automated interactions. As you interact with our website or intranet, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this Personal Data by using cookies, and other similar technologies. Further information about the cookies we use and how you can manage your preferences is provided in the Cookies section of this Privacy Notice

6.4 Third parties (or publicly available sources). We may receive categories of Personal Data about you from various third parties and public sources as set out below:

- Technical Data from analytics providers such as Google; advertising networks and search information providers.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
- Identity and Contact Data from data brokers, aggregators or recruitment agencies.
- Identity and Contact Data from publicly availably sources such as Companies House and the Electoral Register.

7.0 Cookies

7.1 Cookies are small text files placed on your computer or device when you visit a website. They help the website recognise your computer or device and remember certain information about your visit.

7.2 Our website uses cookies and other similar technologies to ensure the website function effectively, improve user experience and understand how visitors interact with our website. The following cookies are used on our website:

- **Essential Cookies:** These cookies are necessary for the proper functioning and security of our website. They support core website functions and the management of cookie consent preferences.
- **Non-Essential Cookies:** These include analytical and functional cookies that help us understand how visitors interact with our website, remember preferences and improve website performance. They are only used with consent.

7.3 The following table sets out the cookies currently identified on our website, their purposes, classification, provider and retention.

Cookie Name	Purpose	Classification	Provider	Retention
Banner-status	Records whether a visitor has dismissed the cookie consent banner, preventing it from appearing unnecessarily on subsequent visits.	Essential	Complianz	1 year
Consented services	Stores which website service a visitor has consented to, allowing the website to remember their choices in future returns using browser cookies	Essential	Complianz	1 year
Functional	Records the visitors consent settings for functional cookies required to support website operations	Essential	Complianz	1 year
Marketing	Records whether a visitor has accepted or rejected cookies used for advertising and marketing purposes	Essential	Complianz	1 year
Policy-id	Records the version of the cookie policy associated with the visitor's consent preferences	Essential	Complianz	1 year
Preferences	Records whether the visitor has accepted or rejected optional cookies used to remember website preferences	Essential	Complianz	1 year
Statistics	Records whether the visitor has accepted or rejected cookies used for websites analytics and statistical purposes	Essential	Complianz	1 year
_ga	Helps Google Analytics distinguish one website visitor from another and measure engagement and usage	Non-essential	Google	2 Years
_ga_*	Maintains information about a visitor's analytics session, helping GA4 measure visits and interactions	Non-essential	Google	2 Years

7.4 You can manage your cookie preferences through the cookie settings option available on our website. You may choose to accept or reject non-essential cookies and change your preferences or withdraw your consent at any time.

7.5 By continuing to navigate our website without changing your cookie settings, you hereby acknowledge and agree to the use of our Cookies.

7.6 To opt out of being tracked by Google Analytics across all websites visit http://tools.google.com/dlpage/gaoptout.

7.7 You can also configure your browser settings to block or delete cookies. However, blocking essential cookies may affect the functionality of certain parts of our website.

7.8 We may update this section of our Privacy Notice from time to time to reflect changes in the cookies we use or applicable data protection requirements.

8.0 How we use your Personal Data

8.1 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) so far as your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

8.2 We may also use your Personal Data in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest or for official purposes.

8.3 Generally, we do not rely on consent as a legal basis for processing your Personal Data other than in relation to sending 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.

9.0 Purpose for using your Personal Data

9.1 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.

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

Purpose/Activity (including data for this company and all other companies within the Group)	**Category of Personal Data**	**Lawful basis for processing including basis of legitimate interest**
To register you as a new tenant, client or employee	a) Identity b) Contact c) Special Categories of data	Performance of a contract with you

To process and deliver your service or order including: a) Manage payments, fees and charges b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	a) Performance of a contract with you b) Necessary to comply with a legal obligation
To contact your emergency contact/next of kin (only with clear reasons recorded and only if deemed appropriate by HR) Examples include: a) An employee has become unwell at work and taken to hospital b) An employee has not reported for work. After failed attempts to contact the employee directly, an emergency contact/next of kin may be contacted. c) An employee working from home becomes uncontactable d) An employee working from home appears unwell and has given permission or if deemed too unwell has been notified of the intention e) An employee has not returned to work following a scheduled work appointment Each situation will be considered depending on its individual circumstances.	a) Identity b) Contact	Necessary for our legitimate interests
To manage our relationship with you which will include: a) Notifying you about changes to our terms or privacy policy b) Asking you to leave a review or take a survey c) As an employee	a) Identity b) Contact c) Profile d) Usage e) Marketing and Communications f) Financial	a) Performance of a contract with you b) Necessary for our legitimate interests c) Necessary for our legitimate interests • **to keep our records updated,**

		• **to administer our employee relationships**
To enable you to partake in a prize draw, competition or complete a survey	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 administer and protect our business and our intranet and website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	a) Identity b) Contact c) Profile d) Technical e) Usage	a) Necessary for our legitimate interests • **for running our business and employee relationship,** • **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
To share information within the Chrysalis Group of companies so that relevant housing and support teams can review details, assess suitability, and offer services	a) Identity b) Contact c) Special Categories of Data	a) Consent (which can be withdrawn at any time) b) Necessary for the performance of a contract with you c) Necessary to comply with legal obligations

10.0 Marketing

10.1 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 material 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 receive marketing communications from us if you have requested information from us or purchased products or services from us and, in each case, you have opted-in to receiving that marketing.
- Third-party marketing. We will get your express opt-in consent before we share your Personal Data with any company outside Chrysalis Group 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.
- Where you opt-out of receiving these marketing messages, this will not apply to Personal Data provided to us as a result of a product/service purchase, warranty, product/service experience or other transactions.

11.0 Change of Purpose

11.1 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 and the law

11.2 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.

11.3 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.

12.0 Disclosures of Personal Data – Data Sharing

12.1 We may disclose your personal information:

- if we are under a duty to disclose or share personal data to comply with a legal obligation or

12.2 We may have to share your Personal Data with the parties set out below for the purposes set out in the table above.

- Internal Third Parties: other companies or departments in The Chrysalis Group acting as processors or joint controllers, providing IT and systems administration services or undertaking leadership reporting
- External Third Parties: service providers acting as processors based who provide IT and system administration services
- Other 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 Notice.
- Professional advisers: acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting and payroll services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers who require reporting of processing activities in certain circumstances.

12.3 Chrysalis Group may collect statistics about the behaviour of visitors to its website and may display this information publicly or provide it to others. However, Chrysalis Group does not disclose any of your personal information.

12.4 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.

12.5 We will only store your personal data in the UK. This means that it will be fully protected under the Data Protection Legislation.

13.0 International Transfers

13.1 Some of our external third parties are based outside the European Economic Area (EEA) so their processing of your Personal Data will involve a transfer of data outside the EEA.

13.2 Whenever we transfer your Personal Data out of the EEA, 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 by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give Personal Data the same protection it has in Europe.

14.0 Data Security

14.1 The security of your Personal Information is important to us but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security.

14.2 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 according to our instructions, and they are subject to a duty of confidentiality.

14.3 We have procedures in place to deal with any suspected Personal Data breach and will notify you and any applicable regulator of any breach where we are legally required to do so.

15.0 Data Retention

15.1 We will only retain your Personal Data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

15.2 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 requirements.

15.3 In some circumstances we may 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.

16.0 Your Legal Rights

16.1 Under certain circumstances, you have rights under data protection laws to request the following:

- 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.
- Restrict processing your Personal Data.
- Request the transfer of your Personal Data.
- Withdraw any consent that you have previously given.

16.2 If you wish to exercise any of the rights set out above, please contact our Data Protection Contact on companysecretary@chrysalisgroupservices.co.uk. You can also contact the Information Commission via https://ico.org.uk/ for information, advice or to make a complaint.

16.3 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 may refuse to comply with your request in these circumstances.

17.0 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 expedite our response.

18.0 Time limit to respond

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

19.0 Reporting Complaints

19.1 We are committed to protecting your personal data and handling your personal information fairly, lawfully and transparently. If you have any concerns about how we have collected, used, stored, disclosed or otherwise processed your personal data, you have the right to raise a data protection complaint with us.

19.2 You do not need to use legal terminology or refer to specific provisions of data protection legislation when making a complaint. Please explain your concern in your own words and provide sufficient information to enable us to investigate the matter.

19.3 You can make a data protection complaint by contacting our data Protection contact on companysecretary@chrysalisgroupservices.co.uk. If you require the complaints process in an alternative format or require reasonable adjustments to enable you to make a complaint, please let us know.

19.4 When we receive a data protection complaint, we will;

- acknowledge receipt of your complaint within the 30 days.

- review and investigate your complaint appropriately and without unjustifiable or excessive delay.
- keep you informed about the progress of your complaint where appropriate;
- provide you with the outcome of our investigation and explain any actions we have taken or intend to take.

19.5 If you remain dissatisfied following our response, you may ask us to provide further information or explain our decision. We encourage you to follow our complaints process and raise your concerns with us first, so we have an opportunity to address them. However, you have the right to complain to the Information Commission (formerly known as Information Commissioner's Office) (ICO) at any time if you are concerned about how we use your personal data, how your data protection complaint has been handled or do not feel we have adequately dealt with your compliant.
You can contact the ICO through its website https://ico.org.uk/make-a-complaint/ or by its helpline number 0303 123 1113.

20.0 Privacy Policy Changes

Although most changes are likely to be minor, Chrysalis Group may change its Privacy Policy from time to time at its discretion. Chrysalis Group encourages visitors to frequently check this page for any changes to its Privacy Policy. Your continued use of this site after any change in this Privacy Policy will constitute your acceptance of such change.