



PRIVACY NOTICE

1 Introduction

Community Gateway Association (**CGA, we, us and our**) respects your privacy and is committed to protecting your personal data in accordance with UK data protection law, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. This privacy notice explains how we look after your personal data, your privacy rights, and how the law protects you where you:

- are a current or previous resident or tenant or shared owner of one of our properties (**Residents**);
- are an applicant to be a resident, tenant or shared owner of one of our properties (**Applicants**);
- are a current or prospective recipient of services provided by us (**Service Users**); or
- visit our website (regardless of where you visit it from) (**Website Visitors**).

2 Important information and who we are

This privacy policy aims to give you information on how we collect and process your personal data in all our activities, including through your use of our website, your tenancy or lease with us, shared ownership arrangements, your use of our services, and your interactions with us.

We collect personal data relating to children where they are Residents, Service Users, or household members or Residents or Applicants, or where their details are necessarily provided to us in connection with our provision of housing or services. We process such data with appropriate safeguards and in accordance with our obligations under UK data protection law.

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

3 Controller and Contact Details

Community Gateway Association Limited is the data controller and responsible for your personal data.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy and ensuring our compliance with data protection law. If you have any questions about this privacy notice, wish to exercise your data

protection rights, or have concerns about our data protection practices, please contact our DPO using the following details:

Email: dataprotection@communitygateway.co.uk

Post: Community Gateway Association, Harbour House, Portway, Preston, PR2 2DW

Telephone: 0800 953 0213

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

4 **The data we collect about you**

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

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

Type of individual	Types of personal data
Applicants, Residents, and Service Users	• Identity Data including first name, last name, (including in relation to any appointees to help with benefit applications or rent payments and anyone who will live with you or has custody arrangements or other connections with you or household members), date of birth, employment status, National Insurance number, photographs and videos, and copies of identification documents such as passport and driving licence. • Profile Data including details of your need when you apply to us for accommodation, so we know who needs housing most urgently, and your interests, preferences, feedback and survey responses. • Contact Data including address, email address and telephone numbers. We also collect emergency contact details such as a Next of Kin - address, phone numbers, e-mail address, to ensure the safety and well-being of individuals in case of an emergency situation. • Property Data including the date on which your tenancy, lease or shared ownership agreement begins and ends, monitoring of your compliance obligations in relation to the agreement, details of complaints and repairs raised, including detail of repairs, stage of complaints, internal notes & comments detailing the complaint, Ombudsman referrals, enforcement actions, gas safety checks, electrical certification, and utilities. • Household Data including the number and age of members of your family and anyone else living with you (whether they are to move to one of our properties or not) and details of any individuals who have custody arrangements with any of your household members. • Financial Data including your household income and expenditure, credit history, savings, housing benefit details,

	bank details, rent statements, rent payment records and council tax. • Transaction Data including details about payments to and from you. • CCTV Data including photographs and video footage from CCTV cameras. This also includes audio recordings. • Special Categories of Personal Data including details about your race or ethnicity, sex life, sexual orientation, and information about your health and support needs. • Criminal Offence Data including details of any criminal convictions and offences but only to the extent that you or another individual tell us about this. We only keep Criminal Offence Data as set out in section 6. • Vulnerability Data which is data that we are required to collect to meet regulatory standards and to ensure that we can provide support to Residents and Applicants and ensure our services are tailored to our Residents' needs, including Special Categories of Personal Data. This includes but is not limited to: a) <u>Health and Disability</u>: Information on physical disabilities, mental health conditions, respiratory diseases, autism, and dementia. b) <u>Capacity</u>: Details of literacy, numeracy, or digital skills. c) <u>Housing Life Events/Miscellaneous</u>: Information about residents who are recent care-leavers, refugees, asylum seekers, or those who have recently left supported accommodation, are dealing with anti-social behaviour, or are in or have left a relationship involving domestic violence.
Website Visitors	• Identity Data including first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender. • Profile Data including your username and password, your interests, preferences, feedback and survey responses. • Usage Data including information about how you use our website and services. • Marketing and Communications Data including your preferences in receiving marketing from us and our third parties and your communication preferences. • Contact Data including address, email address and telephone number. • Technical Data including 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 this website.

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

5 **Special Categories of Personal Data**

We may in certain circumstances collect Special Categories of Personal Data about you, in particular where you or a third party provide us with this type of data. This could include details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, and information about your health, medical records and treatment plans, and genetic and biometric data.

Where we collect Special Categories of Personal Data we ensure that we process this data in accordance with Article 9(2) of UK GDPR, and meet a legal condition under Schedule 1 of the Data Protection Act 2018. This includes processing which is necessary for (1) providing you with social housing and related support services, (2) compliance with our legal obligations in employment, social security and social protection law; (3) safeguarding purposes; (4) substantial public interest purposes including equality of opportunity monitoring; (5) the establishment, exercise or defence of legal claims; or (6) where we have obtained your explicit consent.

6 **Criminal Offence Data**

We may collect information about criminal convictions and offences (**Criminal Offence Data**) where we have a legal basis and condition for processing under Article 10 UK GDPR and Schedule 1 of the Data Protection Act 2018. We will do this only where it is relevant to your use of our services or housing provided by us, or where you apply to be a board member. This data includes, for example, convictions for arson, housing fraud, sexual offences or the use or supply of drugs. We maintain an appropriate policy document as required by law when processing such data.

7 **If you fail to provide personal data**

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

8 **How is your personal data collected?**

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

- **Direct interactions.** You may give us your personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - a) apply for social housing or our services;
 - b) apply to become a member of one of our groups;

- c) use our services;
 - d) create an account on our websites or interact with us through our social media channels;
 - e) subscribe to our service or publications; or
 - f) complete surveys, forms or provide feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data and Usage Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies in accordance with our Cookie Policy. We may also receive Technical Data about you if you visit other websites that use our cookies.
 - **Third parties or publicly available sources.** Please see section 16 below.

9 How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- **Performance of a contract:** where we need to perform our obligations under a contract we are about to enter into or have entered into with you.
- **Legitimate interests:** where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. Legitimate interests means our interest in conducting and managing our business to enable us to give you the best service. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not rely on legitimate interests to use your personal data for activities where our interests are overridden by the impact on you.
- **Legal obligation:** where we need to comply with a legal or regulatory obligation, for example, to establish the right of an individual to rent a home from us or where we collect Vulnerability Data in order to provide you with support, as required by our regulator.
- **Vital interests:** where we need to process your data in order to protect your, or another person's vital interests.
- **Consent:** where you have provided consent to us processing your data for a specific purpose.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will obtain your consent before 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.

10 Special Categories of Personal Data

Where we process Special Categories of Personal Data, in addition to the grounds set out above we must also meet a legal condition. Most commonly this will be one of the following conditions:

- **Housing:** where we need to process your data in order to carry out our obligations and exercise our rights in the field of employment, social security and social protection law, which includes the provision of housing.
- **Legal claims:** where our processing of your data is necessary for the establishment, exercise, or defence of legal claims.
- **Substantial public interest:** where we need to process your data for reasons of substantial public interest, which can include safeguarding.
- **Vital interests:** where we need to process your data in order to protect your, or another person's vital interests, and the data subject is not physically or legally able to provide consent.
- **Consent:** where you have provided explicit consent to us processing your data for a specific purpose.
- **Archiving and statistics:** where our processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

11

Purposes for which we will use your personal data

We have set out below, in a table format, a description of the main ways we use your personal data, and which of the legal bases we rely on to do so. This is not an exhaustive list but covers our main processing activities. We have also identified what our legitimate interests are where appropriate.

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

Purpose/Activity	Type of data	Lawful basis for processing
To prioritise and assess housing applications, service eligibility and to complete tenancy sign-ups and property viewings, which includes collecting details of your household members, current property information, and information about individuals	a) Identity b) Contact c) Household d) Profile e) Financial f) Transaction g) Vulnerability h) Special Categories of Personal Data i) Criminal Offence Data	a) Performance of a contract with you b) Necessary to comply with a legal obligation c) Necessary for our legitimate interests (to understand who will be living in our properties to; check that accommodation offered is adequate for current and near future needs of the household; to check that household members' needs are being met; and to ensure that the local community will have quiet enjoyment of their homes)

Purpose/Activity	Type of data	Lawful basis for processing
		d) Condition for processing Special Categories of Personal Data: social security and social protection law e) Condition for processing Criminal Offence Data: safeguarding of children and individuals at risk
To provide support services and to manage your tenancy, leasehold agreements and our relationship with you which will include: a) Replying to requests for information and complaints b) Managing how we communicate with you c) Ensuring that we are meeting your needs when delivering our services d) Communicating with you in relation to any changes in your circumstances, which may impact your housing or other needs e) Inviting you to events f) Notifying you about changes to our terms or privacy notice g) Asking you to leave a review or take a survey	a) Identity b) Contact c) Household d) Profile e) Financial f) Vulnerability g) Marketing and Communications h) If you provide us with such data, Special Categories of Personal Data and Criminal Offence Data	a) Performance of a contract with you b) Necessary to comply with a legal obligation c) Necessary for our legitimate interests (to keep our records updated and to ensure that we are meeting your needs when delivering our services) d) Conditions for processing Special Categories of Personal Data: social security and social protection law or explicit consent. Substantial public interest (with statutory underpinning in respect of the analysis of differential satisfaction within Tenant Satisfaction Survey results) e) Condition for processing Criminal Offence Data: Safeguarding of children and individuals at risk or explicit consent
To assess your application for our Board, Committees, Central Tenant Body or	a) Identity b) Contact	a) Necessary for our legitimate interests (to ensure that we are meeting the needs of our tenants and residents

Purpose/Activity	Type of data	Lawful basis for processing
Scrutiny Group, CGA membership, and to manage your participation in those groups	c) Financial d) Transaction e) Special Categories of Personal Data (where you provide this to us) f) Criminal Offence Data (in relation to DBS checks for Board Members)	and to develop our services and grow our business) b) Condition for processing Special Categories of Personal Data: explicit consent c) Condition for processing Criminal Offence Data: explicit consent
To communicate with the Department for Work and Pensions, local authorities and other agencies and organisations to support you and help to maximise your income through welfare benefits, grant applications or budgeting support.	a) Identity b) Contact c) Household d) Profile e) Financial f) Special Categories of Personal Data g) Vulnerability	a) Consent b) Condition for processing Special Categories of Personal Data: explicit consent
To deal with any medical or other emergencies and to carry out your wishes or requirements such as any religious or cultural wishes	a) Identity b) Contact c) Household d) Profile e) Special Categories of Personal Data f) Vulnerability	a) Necessary to comply with a legal obligation b) Protecting vital interests c) Condition for processing Special Categories of Personal Data: to protect your vital interests or those of another person where the data subject is incapable of giving consent, or explicit consent.
To monitor and record telephone calls between you and us for training, quality assurance, safeguarding, and record-keeping purposes, including any Special Category Data or Criminal Offence Data you may disclose during these calls	a) Identity b) Contact c) Financial d) Transaction e) Special Categories of Personal Data f) Criminal Offence Data g) Vulnerability	a) Necessary for our legitimate interests (to improve the service we deliver). b) Condition for processing Criminal Offence Data: c) Condition for processing Special Categories of Personal Data: to protect your vital interests or those of another person where you are incapable of giving your consent, or explicit consent

Purpose/Activity	Type of data	Lawful basis for processing
To ensure the safety and security of those within our neighbourhoods and communities, to prevent and detect crime, fraud and anti-social behaviour, and to protect our properties and assets, including through use of CCTV	a) Identity b) Contact c) Financial d) Household e) Criminal Offence Data f) CCTV g) Vulnerability	a) Necessary to comply with a legal obligation b) Necessary for our legitimate interests (to maintain a safe neighbourhood and to tackle fraud and prevent crime) c) Protecting vital interests. d) Condition for processing Criminal Offence Data: preventing or detecting unlawful acts.
To perform our obligations in relation to statutory compliance including gas, electrical, fire safety and asbestos checks, repairs, maintenance, improvements and adaptations to our properties including our gardening and other schemes	a) Identity b) Contact c) Household d) Vulnerability e) Special Categories of Personal Data f) Transaction	a) Performance of a contract with you b) Necessary to comply with a legal obligation c) Necessary for our legitimate interests (to ensure that our properties are fit for purpose) d) Condition for processing Special Categories of Personal Data: - social security and social protection law
To respond to legal claims and process statutory applications including Right to Buy and Right to Acquire	a) Identity b) Contact c) Household d) Financial e) Transaction f) Contract g) Vulnerability h) Special Categories of Personal Data i) Criminal Offence Data	a) Necessary to comply with a legal obligation b) Necessary for our legitimate interests (to establish, exercise or defend legal claims) c) Condition for processing Special Categories of Personal Data: the establishment, exercise, or defence of legal claims d) Condition for processing Criminal Offence Data: legal claims
To comply with lawful requests from local authority departments and other statutory bodies in areas of health and social care (e.g. in	a) Identity b) Contact c) Financial d) Household	a) Necessary to comply with a legal obligation b) Necessary for our legitimate interests (to ensure

Purpose/Activity	Type of data	Lawful basis for processing
support of statutory processes for the safeguarding of vulnerable adults and children)	e) Vulnerability f) Special Categories of Personal Data g) Criminal Offence Data	safeguarding of vulnerable adults and children) c) Condition for processing Special Categories of Personal Data: safeguarding of children and individuals at risk d) Condition for processing Criminal Offence Data: safeguarding of children and individuals at risk
Maintaining records about the amount of money you have paid us (whether in relation to a tenancy, lease, shared ownership staircasing or any services); any amount(s) outstanding and action taken to recover money you owe	a) Identity b) Contact c) Financial d) Transaction e) Contract f) Vulnerability	a) Performance of a contract with you b) Necessary for our legitimate interests (to recover any sums owed to us)
Publishing photographs or videos for promotional purposes, subject to your explicit consent which can be withdrawn at any time	a) Identity	a) Consent
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	a) Identity b) Contact c) Technical	a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you, subject to your marketing preferences	a) Identity b) Contact c) Profile d) Usage e) Marketing and Communications f) Technical	a) Necessary for our legitimate interests (to study how customers use our website and services, to develop them, to grow our business and to inform our marketing strategy)

Purpose/Activity	Type of data	Lawful basis for processing
and cookie consent settings.		
To use data analytics to improve our website, services, marketing, customer relationships and experiences	a) Technical b) Usage	a) Necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about services that may be of interest to you	a) Identity b) Contact c) Technical d) Usage e) Profile f) Marketing and Communications	a) Necessary for our legitimate interests (to develop our services and grow our business)

12 Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us

We may use your Identity, Contact, Technical, Profile and Usage Data to form a view on what we think you may want or need, or what may be of interest to you. This helps us tailor our services and communications to better meet your needs (we call this marketing).

You will receive marketing communications from us if you have requested information from us or received services from us and you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes. We maintain records of your marketing preferences and consents in accordance with data protection laws.

13 Opting out

You can ask us or third parties to stop sending you marketing messages by contacting us at any time.

Where you opt out of receiving marketing messages, this will not affect our processing of your personal data for service delivery, including communications that are essential for your tenancy, property management, administrative or customer service purposes.

14 Cookies and Similar Technologies

15 **Change of purpose**

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

If we need to use your personal data for an unrelated purpose, we will notify you in advance, explain the legal basis which allows us to do so, and inform you of your rights in relation to this new processing.

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.

16 **Receipt and disclosures of your personal data**

We may receive personal data about you from various third parties and public sources where we have a lawful basis for doing so.

Where necessary, we may also share your personal data with the following categories of recipients:

- Contractors, for facilitating repairs, maintenance, or improvement works;
- Service providers acting as processors who provide IT and system administration services;
- Former and other Housing Associations;
- Support service providers (including drug and alcohol support services and charitable organisations providing support services);
- Internal and external auditors for compliance and sample testing;
- Insurance companies for processing claims;
- Telecommunications companies for digital switchover purposes;
- Debt and money management advisors and debt collectors;
- Local authority teams, such as social services, environmental health, and benefit agencies;
- Health and social care agencies and providers;
- Energy and utility companies and Council Tax Departments;
- Third parties providing services on behalf of CGA, such as mailing companies for distributing newsletters or research companies for carrying out customer satisfaction surveys;
- Law enforcement agencies including agencies committed to protecting public funds and preventing fraud in line with the National Fraud Initiative, police forces, and other

relevant authorities (e.g., Department of Work & Pensions, Probation Service, HM Revenue and Customs) for safeguarding, the prevention and detection of crime, apprehension of offenders, or collection of tax or duty;

- Regulator of Social Housing, the Housing Ombudsman, Information Commissioner's Office, and other regulatory authorities based in the United Kingdom who require reporting of processing activities in certain circumstances;
- Benefit agencies, local authorities and other government departments such as the Department of Work and Pensions, the Ministry of Housing, Communities and Local Government, and Members of Parliaments and their constituency offices;
- We may share your personal data with the Ministry of Housing, Communities and Local Government (MHCLG) for research and statistical purposes through the CORE (Continuous Recording) system, and we may receive personal data from local authorities and other government departments such as the Department of Work and Pensions, the Ministry of Housing, Communities and Local Government, and Members of Parliaments and their constituency offices; and
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets, subject to appropriate data protection impact assessments and safeguards. If a change happens to our business, we will notify affected individuals and ensure continued protection of their personal data in accordance with applicable data protection laws.

We require all third parties with whom we share your personal data to respect the security of your personal data and to treat it in accordance with the law through appropriate contractual arrangements. We have data processing agreements in place with our third-party service providers that prohibit them from using your personal data for their own purposes and require them to process your personal data only for specified purposes and in accordance with our instructions.

17 **International transfers**

We may transfer your personal data to service providers that carry out certain functions on our behalf. Where this involves transferring personal data outside the UK to countries which have laws that do not provide the same level of data protection as UK law we only do so as set out in this section.

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

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

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

Data security

We have put in place appropriate technical and organizational security measures to protect 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 legitimate business need to know. They will only process your personal data on our documented instructions, and they are subject to contractual confidentiality obligations and data protection training requirements.

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

Data retention

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

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

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

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data, including the right to:

- **Request access to your personal data** (commonly known as a **data subject access request**): This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction of the personal data that we hold about you**: This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data**: This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing of your personal data**: Where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may

demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

You also have an absolute right to object at any time to the processing of your personal data for direct marketing purposes.

- **Request restriction of processing of your personal data** This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - a) If you want us to establish the data's accuracy.
 - b) Where our use of the data is unlawful, but you do not want us to erase it.
 - c) Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - d) You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer of your personal data to you or to a third party.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time where we are relying on consent** to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact our Data Protection Officer using the contact details provided in Section 2 of this notice.

21 **Complaints about how we use your personal information**

If you are unhappy with how we have collected, used, shared, stored or otherwise handled your personal information, you have the right to make a complaint to us. We will acknowledge your complaint and take appropriate steps to investigate the matters you raise, keeping you informed of progress and the outcome of our investigation. We aim to resolve data protection complaints without undue delay.

If you wish to exercise your right to make a complaint, further information can be found on the complaints page on CGA's website, or by contacting our Service Improvement Team on 0800 953 0213 or via e-mail at: complaints@communitygateway.co.uk.

If, after we have considered your complaint, you remain dissatisfied, you have the right to raise your concerns with the Information Commission, the UK's independent authority responsible for upholding information rights and data protection law.

22 **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of your other rights under data protection law). However, we may charge a reasonable fee if your request is clearly unfounded, manifestly excessive, or repetitive in character. Alternatively, we may

refuse to comply with your request in these circumstances. We will inform you of our decision and reasoning if we take either of these actions.

23 What we may need from you

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

24 Time limit to respond

We will respond to all legitimate requests within one calendar month. Where requests are particularly complex or numerous, we may extend this period by up to two further months. If we need to extend the response time, we will notify you within one month of receiving your request, explaining why the extension is necessary and keep you updated on our progress.

25 Changes to the privacy notice and your duty to inform us of changes

We keep our privacy notice under regular review. This version was last updated on 7th July 2026.

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 Community Gateway Association by contacting us on 0800 953 0213.

26 Third-party links

This website may include links to third-party websites, plug-ins and applications (including social media platforms). Clicking on those links, enabling those connections, or interacting with social media features may allow third parties to collect or share data about you independently of us. We do not control these third-party websites or features and are not responsible for their privacy practices or statements. We recommend reviewing their privacy notices before sharing any personal information with them. When you leave our website, we encourage you to read the privacy notice of every website you visit.