

This statement tells you about the information we collect about you, what we do with it and what your rights are about your personal information.

### **What kinds of personal information does KeySteps collect?**

#### **Information you provide to KeySteps**

We collect information that you provide to us when you are applying for a Bond or using other KeySteps services, for example, housing and tenancy advice, information and support. This information may include your name, address, DOB, phone number, email address or National Insurance number. It also includes the details that you provide about anyone else in your household. Sometimes, we also ask you to provide more detailed information such as where you have lived before, details about your money and benefits, where you work, and details of any other organisations that are helping you. You might choose to tell us about any health problems or addiction issues you have and criminal offences you have been charged with/committed, but you are not obliged to disclose this.

#### **Equal Opportunities & Diversity information, Goals and Feedback Forms**

We may ask you to provide information about your, sex, religion, ethnicity, disability status, sexuality, physical and mental health and wellbeing so that we can monitor whether we are helping everyone in the community and work out if we need to change what we do to make the service better for you. We do not need this information to offer you a service and there is no obligation to provide it, although it can help us to offer you more tailored support. We will make sure we tell you when we collect this information that we need your consent to provide it and that you can choose to say no. When we use this information to give statistics to our funders, we do not include your name or any personal details.

#### **Information others provide about you to KeySteps**

KeySteps works in partnership with other organisations that are there to help you. This includes organisations like the Council, Somewhere To Go, supported housing, drug and alcohol services, Probation, mental health services and others.

Organisations that know you may provide information about you and your household to KeySteps. This could be because they are asking us to help you with a bond or because you have asked them to provide a reference.

### **Why do we need your personal information?**

We need your personal data so that we can decide whether we can help you by offering you a Deposit Bond Guarantee Contract or support services. Once we are working with you, we may need further information about you so that we can offer you the most appropriate help and support that you need.

### **How do we use your personal information?**

We use your personal data to offer you services like a Deposit Bond Guarantee, signposting and support.

### **Do you use my personal data for anything else?**

We use your personal data for reporting and statistical purposes. For example, so we can find out how many people have used KeySteps services or how many people we have housed with a Deposit Bond Guarantee. This information does not include any way of identifying you. It helps KeySteps to show what difference we have made and can help us to get more funding to help more people.

Occasionally, some of the organisations that fund KeySteps ask to see examples of the work KeySteps has done to check that we have provided you with a good quality service. We will only share your personal details in this instance if you have given us your consent in advance.

#### **What legal basis does KeySteps have collect and process my personal data?**

**Contract:** if you apply for a Deposit Bond Guarantee you are applying to enter into a contract with KeySteps and your landlord by signing the Bond Agreement. KeySteps will process your personal data in connection with your Deposit Bond Guarantee on the basis that this is necessary for you to enter into the contract with KeySteps and your landlord.

**Legitimate Interest:** KeySteps is here to provide you with housing and support services. You do not have to apply to us for help. However, if you chose to do so, it is important that we collect information about your circumstances, so we can make sure that the help we give you is right for you and safe for everyone. We only use your personal data to offer you the services that you have requested.

**Consent:** we will ask for your consent if we want to use your data for other reasons, for example Equal Opportunities and Diversity monitoring. We will keep a record of the consent you give, including when and how we received your consent.

**Sensitive Data:** sensitive data includes information we collect from you about your health, race, ethnic origin, religion, sexual orientation. This information is also kept strictly confidential.

Information about your race, ethnic origin, religion and sexual orientation is not necessary for KeySteps to offer you a service. However, we would be grateful if you could provide this information on the basis that it is kept confidential and it used in anonymised form, so it is not linked to your name or other personal details. We use this information it to check we are being fair to everyone and not discriminating against groups of people. We also use it to help KeySteps to get more funding so that we can offer more services.

Information about criminal charges/offences: you may choose to disclose this information if you think it will help us to help you better, but you are not obliged to. However, you will be asked by prospective landlords.

#### **Other reasons why we might process and share your personal data.**

**By Law:** we may also process and share your personal data if we need to do this by law. This could include, if we have to share your data with the police as part of a criminal investigation or with Adult Care/Social Services because of a Child Protection issue or concerns about a vulnerable adult/adult at risk.

KeySteps could also decide to share your personal data with other organisations in a life or death situation if it was decided that this was necessary to protect you or someone else.

#### **Keeping your data accurate and up to date**

KeySteps will try to make sure that your personal data is accurate and up-to-date. We will change your personal information, as soon as possible, when we discover it is wrong or out of date. You can help to make sure your data is accurate by telling us as soon as possible if your circumstances have changed.

#### **Sharing your data outside of the European Union**

KeySteps does not share any of your data outside of the European Union.

## How long does KeySteps keep your personal data for?

Drop-in information sessions: data will normally be kept for 3 years from the last contact with KeySteps (for non-bondholders).

Applications: we will shred Bond application form after 6 months when the application does not result in a Bond contract being signed.

Bonds: data is kept during the tenancy, and for 6 years from when we are certain the tenant has left, then it is minimised to name, date of birth, and NI number and kept for as long as KeySteps is issuing bonds.

We may keep your data for longer if there is a legal reason for us to do this.

## What are your rights about the personal data KeySteps has about you?

**The Right of Access:** you have the right to look at and request a copy of all the data we hold about you. You can do this by contacting Manager of KeySteps (details below). We will provide this information to you free of charge and always within one month of you requesting it.

**The right to rectify:** you have the right to ask us to change your personal data if it is wrong or if there is something missing. We will do this within one month of your asking us to.

**the right of erasure:** you have the right to ask us to delete your data. We will let you know if this is possible and if not, we will explain why in writing and inform you of your rights to appeal or complain.

**The right to restrict processing:** even if you don't want us to delete your data completely, you can still ask us to stop processing it. Examples of why you might want to do this include, you believe the information we have about you is incorrect, so you don't want us to use it in any way until it has been put right.

**The right of portability:** you have a right to request a copy of all the personal data we have about you in a common, machine readable format and to have this free of charge. We will provide this information within one month of you requesting it.

**The right to object:** you have the right to object to KeySteps processing your personal data if we do so to:

- Send you direct marketing, such as information through the post, by text or email, without your consent.
- Process your personal data for statistical purposes without your consent.
- Process your personal data because we believe we have a good reason (legitimate interest) for doing so or because we think we need to process it for a legal reason.
- Please note that you do not have the right to object if KeySteps is processing your personal data on the basis that we are doing so because you have signed a contract with us, such as a Bond agreement.
- If you object, we will stop processing your data in these circumstances as soon as you ask us to, unless there is a good reason why we can't do this. If this happens, we will explain our reasons to you in writing within 14 days and we will explain your rights to appeal and complain.

**The right to withdraw consent:** if KeySteps is using your information because you have given us your consent, you can withdraw your consent at any time by contacting us. We will follow your instructions for what you would like us to do next, for example, by deleting your data or by stopping processing it.

**The right not to be profiled:** KeySteps does not currently use automated decision making in any circumstances.

You can contact KeySteps about any of your data rights, using the details at the end of this statement.

### **Keeping your personal data safe**

KeySteps takes the security and confidentiality of your personal information very seriously. We have policies and procedures in place to make sure the risks of us losing your information or sharing it with someone we shouldn't are very low. We do not share your personal data with anyone without your consent, unless required to do so by law.

### **Reporting data breaches**

If KeySteps finds out there has been a risk to your personal data, for example, because we have shared it with someone we shouldn't, or we have lost it, we will follow the law and inform the Information Commissioners Office within 72 hours of becoming aware of the problem. If the problem is likely to affect your rights to freedom and privacy, we will also inform you as soon as possible take all reasonable action possible to reduce the impact of the data breach on you. KeySteps will keep a record of any data breaches, regardless of whether we are required by law to inform the Information Commissioners office.

### **Changes to this privacy statement**

This statement takes effect from the 30th September 2020. KeySteps will review this statement every 6 months to ensure it is up to date with the law and to ensure, for example, that the processing and purposes of your personal data have not changed. If we make any changes to this privacy statement or our Data Protection Policy, we will update you by including the new version on KeySteps website and on KeySteps's Facebook page.

A full copy of KeySteps's Data Protection and Privacy Policy is also available if you would like further information about KeySteps's approach to Data Protection and Privacy.

### **Contacting KeySteps for further information about your personal information and your rights.**

For the purposes of the General Data Protection Regulations 2018, KeySteps is the controller and processor of your data. All enquiries about your personal data and to request any of the above rights should be made by contacting:

**Maggie Lyons, KeySteps, Rooms 1 – 2, St John's Hall, Boulevard, Weston-super-Mare, BS23 1NA**  
**Tel: 01934 617617 [office@KeySteps.org.uk](mailto:office@KeySteps.org.uk)**

If you disagree about any decision we have made about collecting or processing your personal data, KeySteps also has an appeals process in place, allowing you to appeal any decision you make to KeySteps of Trustees within 1 month of the date of the decision. We will let you know how to do this in writing at the time of the decision.

### **The right to complain to the Information Commissioners Office.**

If you have a concern about KeySteps' approach to collecting, storing or processing of your personal data, you can contact KeySteps. However, you also have the right to report your concerns to the Information Commissioners Office. Their helpline number is: 0303 123 1113. Further information can also be found on their website: <https://ico.org.uk/>