

# First Homes Privacy Notice

## About this notice

This privacy notice explains how we collect, use, share, and protect your personal data, and the rights you have under data protection legislation. This notice also explains how and where your personal data may be shared with us or by us, and for how long we will keep your personal data.

This privacy notice applies to the processing we undertake to support the delivery of the Government's First Homes scheme. It is important that you read this notice in conjunction with the Dover District Council (DDC) Corporate Privacy notice. This can be viewed at [www.dover.gov.uk/privacy](http://www.dover.gov.uk/privacy).

## Processes where your information is used

There are three processes relating to First Homes where your personal information will be shared by and with us and processed by us. These are:

- When you purchase a First Homes property
- When you sell your First Homes property
- When you request to let your First Homes property

## Information we may collect from you

To provide this service we will collect and use some or all of the personal data below:

- Contact information – name, current property, current address, contact details such as email, mobile and / or telephone number.
- Gender
- Date of birth
- Age
- Personal Identification - Passport, driver's license
- Image.
- Citizenship information (where applicable).
- Nationality
- Previous address history (if needed for eligibility information).
- Financial / employment circumstances information, including income, savings and mortgage offers.
- Any further local connection information which could include: family members' addresses, proof of work, armed services information.
- Anonymised equal opportunities information, including citizenship, ethnicity and disability information where provided.

Most of this information is provided and shared to us by the housebuilder / developer of the First Home, but we may also get some information about you from your mortgage advisor and solicitor in order to assess and make an eligibility and qualifying decision on your First Home application.

## How we will use the information we hold about you

We use this information for one or more of the following reasons:

- To assess your eligibility for the First Homes scheme and make a decision about your application.
- To confirm eligibility to purchase a First Home so that the Council can issue the Authority to Proceed and Authority to Exchange documents (which includes the compliance certificate). These documents are needed to buy a First Home.
- Where not all the required information has been provided for us to Issue the Authority to Proceed and / or Authority to Exchange, further information will be requested about the purchaser, from the appropriate person, in order to approve or refuse an application.

- The Council will need to give approval for the homeowner to sell or let out a First Home. Information as listed in the previous section, will be kept on the homeowner and their property to ensure that resales and letting of First Homes are conducted in compliance with Government guidance.

## **Lawful basis for collection and processing your personal data**

Our lawful basis for processing your information is:

- UK General Data Protection Regulation
  - GDPR Article 6(1)(a) Consent
  - GDPR Article 6(1)(b) Contract
  - GDPR Article 6(1)(c) Legal obligations
  - GDPR Article 6(1)(e) Public task

Our legal basis for using your personal information is to meet our legal obligations. Local authorities should secure discounts on First Homes in perpetuity through agreements under the powers of Section 106 of the Town and Country Planning Act 1990 as indicated in the Written Ministerial Statement.

No personal information is routinely sent or held outside the UK. Should the transfer of personal information outside the UK become necessary, it will only take place if permitted by law, and only where there are appropriate safeguards in place to protect the data.

## **Anonymisation**

Your personal information may be converted ('anonymised') into statistical or aggregated data in a way that ensures that you cannot be identified from it.

Aggregated data cannot, by definition, be linked back to you as an individual and may be used to conduct research and analysis, including the preparation of statistics for use in our monitoring of service delivery and internal reports. Processing is necessary to anonymise your data, after the anonymisation has taken place, the information will no longer be personal data.

## **Who we will share your information with**

Sometimes we may need to share your information, but we will only do so where we have a valid legal basis to share data. We will only share the minimum amount of information for each circumstance. We will share some of your personal information with one or more of the following:

- Developer / homebuilder who is selling the First Home
- Mortgage advisor
- Solicitor
- Estate Agent

This is in order to complete and share the Authority to Proceed form and Authority to Exchange (and Compliance Certificate).

## **How long we keep your personal information**

We will hold this information for as long as it is needed, or where we are legally required to do so. In practice this means that your personal information may be retained for the relevant periods listed below:

- Physical extra evidence which includes personal information related to the purchaser's eligibility for the First Home scheme will be retained for 7 years after the First Home is sold. This includes evidence which shows the purchaser(s) either live, work, have family in the Dover District / Parish or part of the British armed forces for the time period specified in the Section 106.
- Application forms will be kept up to the point until the First Home is sold, or it no longer remains a First Home, or if the application is rejected.
- Personal information on the contact's name, address and phone number / email of the First Home purchaser(s) will be stored until the property is sold to a new purchaser, to make sure it continues to comply with First Home requirements around letting and selling.

We will hold the information above to comply with the First Home monitoring process. After this, your personal information will be deleted. All information will be held securely and disposed of confidentially.

## Your rights

Under data protection legislation, in certain circumstances you have certain rights over the processing of your personal data in this notice. These rights include:

- The right to be informed
- The right of access to personal data
- The right of correction or rectification
- The right to data portability
- The right to restrict processing
- The right to object
- The right to erasure / right to be forgotten

To request your records, you will need to provide proof of identification and write to the New Homes Officer: Data Protection Officer, Dover District Council, Council Offices, White Cliffs Business Park, Whitfield, Dover CT16 3PJ or email [dataprotection@dover.gov.uk](mailto:dataprotection@dover.gov.uk).

You also have the right to make a complaint about our handling of your personal data to the [Information Commissioner's Office](#).

You can exercise any of these rights, ask questions about how we use your personal data or complaint by contacting us at [dataprotection@dover.gov.uk](mailto:dataprotection@dover.gov.uk), or by writing to our data protection officer at:

Data Protection Officer, Dover District Council, Council Offices, White Cliffs Business Park, Whitfield, Dover CT16 3PJ.

## Providing accurate information

It is important that we hold accurate and up to date information about you to assess your needs and deliver the appropriate services. If any of your details have changed, or change in the future, please tell us so that we can update your records.

## Changes to this Privacy Notice

We will review this Privacy Notice from time-to-time and place updates on our website. Please refer to our Corporate Privacy Notice at [www.dover.gov.uk/privacy](http://www.dover.gov.uk/privacy) for further details of how we process your personal information and for details on exercising your data protection rights. This is also available in other formats (i.e., large print).