

Shared Ownership 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 where your personal data may be shared with us by third parties.

The privacy notice applies to the processing we undertake to deliver our shared ownership service. 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.

Information we may collect from you

You may provide information by filling in and completing forms on our website, (or through a third-party website), by phone, email, letter or face to face meetings. This includes information you provide when you register your interest to purchase a shared ownership property sold by us. The information we collect and process about you may include:

- Proof of identity (including photo ID and official documents such as bank statements, utility bills etc)
- Full name(s) of applicants / buyers / leaseholders
- Gender(s)
- Relationship status
- Household demographics (such as number of people in the household)
- Date of birth(s)
- Address at point of application
- Address details of the property being purchased
- Contact details (such as email address, telephone and / or mobile number)
- Details of the date of build and completion dates
- Build type and layout of the property being purchased
- Contact details for your conveyancing solicitor
- Contact details for your financial advisor and mortgage broker
- Contact details for your mortgage company
- Cost of property being purchased (including other costs, such as rent and service charges amounts)
- Financial information (such as bank details, household income(s), expenditure, total benefits received, arrears and deposit mounts)
- Documents (such as mortgage offers, lease agreements and any other related agreements)

Information we received from other sources

We may receive information about you if you use other services during the sales progression, such as a third-party website or a mortgage broker. This information may be combined with other information you provide us, as described above.

How we use your personal information

We use personal information about you in connection to the following purposes:

General

- To respond to enquiries
- General correspondence between you and us on matters relating to shared ownership

Marketing

- To provide you or selected third parties with information about goods or services that may interest you; in the form of property alerts, newsletters and related information.

Eligibility and affordability assessments

- To check whether all applicants are eligible for the shared ownership scheme.
- To check whether all applicants meet the affordability thresholds for the shared ownership scheme.
- To provide you with information, products and services about shared ownership that you have requested.

Service improvements and account management

- To notify you about changes to the service we provide, or policy and procedural changes that may impact you while you have a lease agreement with us.
- To administer our website(s) and advertisements using other third parties, and for internal business administration and operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- To inform you about shared ownership events or open days.
- For the management of shared ownership properties.
- For the purposes of advice and information.
- To handle and respond to complaints.
- To conduct surveys for the purposes of improving service delivery.

Sharing your personal information

We may share your personal information with third parties in the following circumstances:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you, for the purpose of completing services on our or your behalf, such as repairs.
- If required in order to obtain professional advice pertaining to a sale, resale, the purchase of additional shares ('staircasing'), 'down staircasing' and re-mortgaging of shared ownership properties owned by Dover District Council (DDC). Individuals or organisations we may share your information with include:
 - Mortgage brokers
 - Mortgage providers
 - Conveyancers (property solicitors)
 - Prospective buyers
 - Third-party websites (to market the property e.g. Share to Buy)

- Public service bodies (including Homes England for audit and monitoring purposes)
- Estate agents (where used to market properties)
- If we are under duty to disclose or share your personal information in order to comply with our legal obligations, or in order to enforce the terms of lease agreements and other agreements; or to protect the rights, property or safety of DDC. This includes exchanging information with other organisations for the purposes of fraud protection.

We will not pass your personal information to external organisations for marketing or sales purposes for any commercial use without your prior consent.

We may also receive personal information about you from third parties in the following circumstances:

- From third-party websites where properties owned by us are advertised, and where you input your information to register your interest in one of our shared ownership schemes.
- From other organisations or individuals pertaining to the sales progression of your purchase, such as from mortgage advisors, conveyancers (property solicitors) and mortgage providers.
- Where a third-party (such as a mortgage company) is under duty to disclose or inform us of your personal information in order to comply with any legal obligations, or in order to enforce the terms of an agreement with you.

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

The following legislation applies to our personal data processing:

- The Housing Act 1988
- The Housing Shared Ownership Leases) (Exclusion from Leasehold Reform Act 1967 and rent Act 1977) (England) Regulations 2021

What your rights are

Under data protection legislation, in certain circumstances you have the following 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

All the rights you are entitled to are outlined in our Corporate Privacy notice. To exercise your rights please visit the 'Your Privacy' webpage for more information.

Anonymisation

Your personal information may be converted ('anonymised') into statistical or aggregated data in such 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.

How long do we store your information and is it secure?

We keep your personal information for the minimum period necessary, or when it is required to be retained by law. All information will be held securely and disposed of confidentially. You can view our Shared Ownership Retention Schedule for further details at [Retention Schedule \(dover.gov.uk\)](https://www.dover.gov.uk/retention-schedule)

If your application for a property is unsuccessful, DDC will hold your data on file only until a sale has completed on the relevant property, in case you are in a position to reapply for the scheme/property.

If your application for a Shared Ownership home is successful, application data gathered during the process will be removed from all emails and hard copy files. They will only be held on our encrypted internal network with restricted access for authorised staff only. Please note, your application information will be held for approximately a 5 year period. The data will be removed during the month of January each year when it is at least 5 years old. This means if your sale completes in July 2023, the data will be removed completely in January 2029. – Our reason for storing the application data is to maintain accurate and complete records of sale transactions both for reporting and audit purposes.

Changes to this Privacy Notice

We review this Privacy Notice regularly and will place updates on our website. Please refer to our Corporate Privacy Notice for further details of how we process your personal information and for details on your additional rights. This is also available in other formats (e.g. print)