



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.

Within the Group there is:

- A private Non-Profit Registered Social Landlord (RSL), regulated and registered by the Regulator of Social Housing and the Financial Conduct Authority, providing specialist supported homes and related services to vulnerable people across England & Wales.
- A Charitable Incorporated Organisation (CIO), Opoka, regulated and registered by the Charities Commission, that supports Polish women and children escaping domestic abuse, helping them establish their recoveries and build new lives free from the threat of abuse.
- A Community Interest Company (CIC), The Compass Project 2012, an addiction recovery-driven project offering a range of support services, providing a pragmatic solution to those recovering from addiction by giving direct interpersonal peer mentorship, counselling, group support, and structured supported homes, alongside a variety of work and retail-based training opportunities.
- A limited company providing quasi-residential rehabilitation treatment programmes, Journey Care Services Ltd, registered and regulated by the Care Quality Commission (CQC).
- A specialist commercial investment, consultancy and property management company, Touchstone Development & Investments Ltd, that supports the wider strategy and property management requirements of the Group.
- A commercial cabinetry and furniture manufacturing company, Blackfields Furniture, offering both internal and external services, adding value within the group.

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.

2.0 Contact details

2.1 Our full details are:

Full name of legal entity:	Chrysalis Group Services Limited
Name of Data Protection Officer:	Sandra Paslawska
Email address:	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 Website Visitors

- 5.1 Like most website operators, Chrysalis Group collects non-personal information of the sort that web browsers and servers typically make available, such as the browser type, language preference, referring site, and the date and time of each visitor request. Chrysalis Group’s purpose for collecting non-personal information is to better understand how visitors use our website. From time to time, Chrysalis Group may release non-personal information in the aggregate, for example, by publishing a report on trends in the usage of its website.
- 5.2 Certain visitors to Chrysalis Group’s website choose to interact with Chrysalis Group in a way that requires us to gather personal information. The amount and type of information that we gather, depends on the nature of the interaction.
- 5.3 Chrysalis Group’ website contains links to, and may be linked from, other organisations’ websites. When individuals come to our website from another website, we may get personal information about them from the other website
- 5.4 Chrysalis Group may also receive personal data internally, from organisations within Chrysalis Group, where those organisations share such information with us to assist with the delivery of our services.
- 5.5 Under the General Data Protection Regulation 2018 visitors have the right to:
- ask us not to process or retain their personal data
 - see information we hold about them
 - ask for inaccurate personal data to be corrected

6.0 Data Collection

- 6.1 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

6.2 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.

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

7.0 Failing to provide Personal Data

7.1 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.

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

7.2.1 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.

7.3 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.

7.4 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 available sources such as Companies House and the Electoral Register.

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 recover debts due to us
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 study how customers and clients use our products/services; and, • 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 study how customers use our products/services; and • to develop them and grow our business.
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 deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	a) Identity b) Contact c) Profile d) Usage e) Marketing and Communications f) Technical	Necessary for our legitimate interests <ul style="list-style-type: none"> • to study how customers use our products/services, • to develop them, • to grow our business and • to inform our marketing strategy.
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	a) Technical b) Usage	Necessary for our legitimate interests <ul style="list-style-type: none"> • to define types of customers for our products and 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 goods or services that may be of interest to you	a) Identity b) Contact c) Technical d) Usage e) Profile	Necessary for our legitimate interests <ul style="list-style-type: none"> • to develop our products/services; and, • to grow our business
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
To allow you to access the visual and/or audio recordings taken during use of our recording studio services (for 30 days unless agreed otherwise)	a) Visual and Audio	a) Necessary for performance of a contract with you b) Consent (which can be withdrawn at any time)
To allow us to create content for communication and marketing purposes	a) Visual and Audio	a) Consent (which can be withdrawn at any time)

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 How we use Cookies

- 15.1 To enrich and perfect your online experience, Chrysalis Group uses “Cookies”, similar technologies and services provided by others to display personalised content, appropriate advertising and store your preferences on your computer.
- 15.2 A Cookie is a string of information that a website stores on a visitor’s computer. The browser provides this information to the website each time the visitor

returns. Chrysalis Group uses Cookies to help identify and track visitors and their website access preferences. Chrysalis Group's visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using Chrysalis Group websites, with the drawback that certain features of Chrysalis Group' websites may not function properly without the aid of cookies.

- 15.3 By continuing to navigate our website without changing your cookie settings, you hereby acknowledge and agree to Chrysalis Group' use of Cookies.
- 15.4 You can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed.
- 15.5 To find out more about Cookies, including how to see what cookies have been set and how to manage and delete them, visit www.aboutcookies.org or www.allaboutcookies.org
- 15.6 To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access our site more quickly and efficiently including, but not limited to, login and personalisation settings. It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings

16.0 Data Retention

- 16.1 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.
- 16.2 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.
- 16.3 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.

17.0 Your Legal Rights

- 17.1 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.

17.2 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 Commissioner's Office via <https://ico.org.uk/> for information, advice or to make a complaint.

17.3 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.

18.0 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.

19.0 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.

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.