



# Privacy Notice – Dec 2024



## Privacy Notice

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Sparrow Homes is committed to handling your information securely, respectfully and in line with data protection and privacy laws. As part of this Privacy Notice we need to explain what we do with your personal information. This is relative to how you are associated with Sparrow Homes. A separate Privacy Notice is available to employees and representatives of Sparrow Homes (including Board Members and third parties) engaged in the controlling and processing of customer information. This Privacy Notice tells you what to expect us to do with your personal information when you make contact with us or use any services of any of our legal entities that comprise Sparrow Homes.

### The Privacy Notice explains:

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- Who we are and how to contact us
- What information we collect
- Types of information we collect
- What types of organisations that we receive or provide personal information to
- Why we process your information
- Our legal obligations regarding personal information
- How we collect your information
- Who we might share your information with and why
- Sending your information outside of the UK and EEA
- How long we keep your information for
- How we protect your information
- Whether we do automated decision-making or profiling
- What your rights are
- Changes to our Privacy Notice; and
- Making a complaint

## Who we are and our contact details

We are Sparrow Homes of 5th Floor, Orion House, 5 Upper St Martins Lane, London WC2H 9EA. You can find out more about us at <https://www.sparrowsharedownership.co.uk>.

For further information on your rights, personal information or anything in this Privacy Notice, please contact our Data Protection Officer by emailing [Sparrowsharedownership@sagehomes.co.uk](mailto:Sparrowsharedownership@sagehomes.co.uk)

Our Data Protection Officer is responsible for data protection compliance at Sparrow Homes.

We will make every effort only to collect the personal information we need. The type of information we collect will vary depending on the service we offer to you and / or your relationship to Sparrow Homes.

## The information we collect

All of the types of personal information that we hold, and process is relevant to your association with Sparrow Homes. Below are generic indications of the information that we collect.

NO.	TYPE	DEFINITION	DETAILS OF THE PERSONAL INFORMATION SHARED	CATEGORY OF INDIVIDUAL
1	Management Companies	These are organisations that provide property and tenancy management on behalf of Sparrow.	These companies provide full customer information including rent and property management details.	Tenant, Shared Owners, Employees of Management Company and their suppliers.
2	Repairs and Compliance Contractors	These are organisations that carry out compliance checks and servicing of compliance components on behalf of Sparrow.	They will provide certifications including customer's name and addresses as well as sometimes customer's signatures.	Tenants, Shared Owners, Employees of Contractors and their relevant suppliers.

NO.	TYPE	DEFINITION	DETAILS OF THE PERSONAL INFORMATION SHARED	CATEGORY OF INDIVIDUAL
3	Sales Agents	These are Sales Agents who work with Sparrow Homes to help generate prospects. All Sales Agents have an agreement in place with Sparrow.	Sales Agents provide details of individuals who are interested in purchasing a property from Sparrow.	Shared Owners and prospective Shared Owners, Employees of Sales Agents.
4	Brokers	These are firms or individuals helping to progress property transactions by working as an intermediary to facilitate prospective customer's financial assistance.	These are appointed by individuals and will provide details related to affordability and the applicant.	Shared Owners and prospective Shared Owners, Employees of Brokers.
5	Conveyancing Solicitors	These as solicitors appointed by individuals to process property sales.	These are appointed by individuals and will provide personal information required for conveyancing.	Shared Ownership applicants and the employees of the Conveyancer
6	Local Authorities	Local Authorities or Councils will share information such as Tenancy Applicants with Sparrow Homes. We will also work with Local Authorities across a wide range of areas such as Safe-guarding and managing anti-social behaviour.	For Tenancy Applicants they will provide details of the tenant and their household.  For other matters it will be relevant to the type of processing, for example, for safeguarding this will be about how to protect people.	Tenants, Shared Owners, Local Authority Employees, Other individuals.
7	Police Forces	These are public bodies that are responsible for law enforcement in an area.	Information related to a suspected or actual criminal act. Working together to address anti-social behaviour.	All individuals

NO.	TYPE	DEFINITION	DETAILS OF THE PERSONAL INFORMATION SHARED	CATEGORY OF INDIVIDUAL
8	Utility Companies	These are providers of services such as gas, water and electric.	When a new tenant or shared owner moves into a property, Sparrow Homes will update the Utility Company so that customers are able to smoothly transition to paying the utility bills.	Tenants and Shared Owners.
9	Medical Professionals	These are both private and public medical professionals such as GP Surgeries or specialists.	Where an adaption to a home is requested, as evidence of financial hardship or an insurance matter.  For Employees, this will help Sparrow to make reasonable adjustments.	Tenants, Shared Owners and Employees.
10	Government Departments	These are different parts of the United Kingdom Government.	Sparrow Homes works with many different Government Departments such as the Department for Work and Pensions for Universal Credit, HMRC for payroll submissions and returns, Companies House for returns and organisation record keeping and Land Registry for recording and maintaining titles.	All individuals

NO.	TYPE	DEFINITION	DETAILS OF THE PERSONAL INFORMATION SHARED	CATEGORY OF INDIVIDUAL
11	Market Research Organisations	These are organisations appointed by Sparrow Homes to conduct market research.	This is used to improve our organisation and understand customer satisfaction. Our appointed Management Agent Partners may also conduct market research.	Tenants, Shared Owners
12	Insurance Companies	These are organisations that Sparrow Homes has appointed as insurers.	Sparrow Homes may need to share information to ensure that our assets are insurable and in the event of a claim.	All individuals (where a claim is made).
13	Social Media and Advertisers	These are digital organisations that help with marketing.	When accessing our websites, there is a cookie banner which identified where we share personal information. The main partners are Google and Facebook.	Shared Owners and Prospective Shared Owners

Personal information such as your name, address, date of birth, email address, phone number, gender, marital status, disability, race, religion, employment status, National Insurance Number and next of kin details for you and your family. We also hold data about your credit risk, rent account, rent payments, benefit status, bank account details, credit reports and contact with us about rent arrears and agreements you have made to repay arrears.

Special category personal information. This is sensitive personal information, for example, your racial, or ethnic origin, religious beliefs, other beliefs, sexual orientation, health information, political opinions and so on. Sparrow Homes would only collect your sensitive personal information where there is a clear need for us to do so, such as to assess what services are relevant to you or to offer appropriate support to you. Before collecting any sensitive personal information about you we will always try to make it clear to you what information we are collecting and the reason for collecting it and explain your choices in respect of providing this information.

Criminal offence data. This is data relates to criminal convictions and offences or related security measures. Sparrow Homes collects this data to ensure appropriate services can be provided. Before collecting any criminal offence data about you we will always try to make it clear to you what information we are collecting and the reason for collecting it. Sparrow Homes collects information directly from you, but we also receive information from other organisations. There are a number of different organisations that provide Sparrow Homes with personal information.

The types of organisations that Sparrow Homes regularly share and/or receive personal information are as follows:

#### Why we process your data

Under data protection legislation we can only use your data for certain reasons and where we have a legal basis to do so. The bases on which we typically process your data are:

- To meet obligations under a contract – your tenancy agreement, your lease or an employment contract are all common examples - or because you have asked us to do something with a view to entering into a contract with you.
- In order to further Sparrow's (or a third party's) legitimate interests. Our legitimate interests include: ensuring that we deliver our service to you and your household members; to properly manage our business; promoting our services. We will look to balance your interests with our legitimate interests where we rely on this condition.
- Because we have a legal obligation to do so, please refer to the table below for details; and/or
- To protect the vital interests of you, your family or others.
- Where you consent to us doing so, such as with cookies on our website

In most cases we have a legal basis for processing the data because you have a tenancy agreement or lease with us (or are applying for one). We may need to process your data in order to assess your suitability for a home or provide you with services you need such as repairs and maintenance, tenancy advice, mutual exchanges, allocation of homes, complaints etc.

## Sparrow Homes legal obligations

Sparrow Homes is subject to a number of laws that affect our personal information processing. We have provided a list of the main laws that affect our personal information processing below as well as detailing which category of individual it relates to.

NO.	LAW	PERSONAL INFORMATION IMPLICATIONS	WHO IT RELATES TO
1	Medical Reports Act 1988	Medical reports that have been provided for employment or insurance purposes.	For employment employees, for insurance potentially anyone.
2	Care Act 2014	This affects care assessments, support plans, personal care advocacy. This also adds a duty to protect the vulnerable and engage in safeguarding.	Individuals receiving or seeking care.
3	Children Act 1989	Sparrow Homes will engage in multi-agency working to promote child welfare. There are various orders that a Local Authority has to comply with that Sparrow Homes are subject to.	Children.
4	Children's Act 2004	Ensure that employees with safeguarding responsibilities have suitable training.	Employees.
5	Companies Act 2006	Records for Directorships need to be stored and retained as well as Board minutes.	Sparrow Homes Company Directors and Board Members.
6	Control of Asbestos at Work Regulations 2002	Training records, licences and exposure relating asbestos. Associated medical records.	Employees and relevant tradespersons.
7	Control of Asbestos Regulations 2006	Training records, licences and exposure relating asbestos. Associated medical records.	Relevant tradespersons.
8	Equalities Act 2010	Conducting Equality Impact Assessments, records of Equality training.	Employees and Customers.



NO.	LAW	PERSONAL INFORMATION IMPLICATIONS	WHO IT RELATES TO
9	Fraud Act 2006	We will need to retain and share with relevant authorities information that has been supplied to gain tenancies or support agreements as well as purchase properties.	Customers.
10	Health and Safety at Work Act 1979	Sparrow Homes need to create and maintain records of Health and Safety training, incidents and protective equipment.	Employees and relevant tradespersons.
11	Homelessness Act 2002	This contains provisions to administer applications for social housing. We will need to process details around your housing needs (which may contain Special Category Data such as information on your health).	Prospective and current tenants.
12	Homelessness Reduction Act 2017	This requires Sparrow Homes to keep a record of customers to be threatened with homelessness.	Customers.
13	Housing Act 1985	Sparrow Homes need to know occupants age, age and gender to ensure that properties are not statutorily overcrowded	Tenants.
14	Housing Act 1996	This contains provisions to gather details to gather personal information to manage the anti-social behaviour of tenants.	Tenants.
15	Housing Act 2004	This includes provisions to assessing and removing health risks. For example, we may need to collate records of fire hazards left by customers in areas that are meant to be left clear. This act requires the provision of a Tenant Deposit Protection Scheme.	Customers for the health risks. The deposit protection scheme for Private sector tenants.
16	Housing and Planning Act 2016	This contains details on the Right to Buy, where Sparrow Homes will need to maintain details of eligibility as well as for administration purposes.	Tenants.

NO.	LAW	PERSONAL INFORMATION IMPLICATIONS	WHO IT RELATES TO
17	Housing and Regeneration Act 2008	This changed some of the regulation around how we deliver our services meaning we needed to learn more about our customers.	Customers.
20	Income Tax (PAYE) Regulations 2003	This involves us processing details around payroll.	Employees.
21	Limitations Act 1980	The Limitations Act relates to the period when claims can be made against an organisation. This is the base for the majority of Sparrow Homes' person data retention.	Everyone.
22	Localism Act 2011	This includes various provisions, but it is largely where Sparrow Homes may need to provide funding for developments to community projects. We will need to process personal information of individuals involved in such schemes.	Community Partners.
23	Mental Capacity Act 2005	This relates to individuals who do not have the mental capacity to make some or all their own decisions. Sparrow Homes will need to keep record of these individuals, their needs and who is authorised to make decisions on their behalf.	Customers.
24	Mental Health Act 1983	This includes numerous provisions such as giving other powers to make decisions for you, to enabling you to be treated for your mental health needs in the community.	Customers and Employees.
25	Prevention of Social Housing Fraud Act 2013	This relates to the prevention of social housing fraud and requires information to be processed to this effect. This means that Sparrow Homes will need to keep records of the various individuals with authority to act on your behalf as well as the associated medical records.	Customers.

NO.	LAW	PERSONAL INFORMATION IMPLICATIONS	WHO IT RELATES TO
26	Safeguarding Vulnerable Groups Act 2006	This puts a duty on Sparrow Homes to check the suitability of our employees and volunteers working with vulnerable groups. We need to undertake checks such as criminal checks and keep appropriate records.	Employees and volunteers.
27	Statutory Maternity Pay (General) Regulations 1986	We need to keep a track of pregnant employees and those on maternity leave to administer the provisions in this Act.	Employees.
28	Statutory Shared Parental Pay (Admin) regulations 2014	We will need to keep a track of where employees are having or adopting a child. Sparrow Homes will need to keep track and administer requests.	Employees.
29	Statutory Sick Pay Regulations 1982	We will need to keep track of the amount of sickness absences as well as payments.	Employees.
30	Taxes Management Act 1970	Details of payments including to employees need to be processed, shared with HMRC and retained.	Employees.
31	The Income Tax (employments) Regulations 1993	This relates to the management of expenses and payroll.	Employees and others that are allowed to claim expenses.
32	The Statutory Paternity Pay and Statutory Adoption Pay (admin) Regulations 2002	This requires Sparrow Homes to monitor and manage paternity and adoption pay.	Employees.

## Special category personal information and criminal offence data

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We can only process special category personal information and criminal offence data in certain circumstances

- With your consent;
- Where we need to protect the vital interests (i.e. the health and safety) of you or another person;
- Where you have already made your personal information public;
- Where we or another person needs to bring or defend legal claims; and/or
- Substantial public interest grounds (e.g. safeguarding, protecting the public, preventing unlawful acts)

How we use your information

We use the information we collect from or about you (as applicable) in various areas of work, including:

Assessing and processing housing applications, sales of shared ownership properties, service eligibility and completing tenancy sign-ups

To process your application, we require your name and contact details (including telephone numbers, email addresses and details of anyone you may choose to represent you) for use across the organisation and by our contractors, suppliers and partners.

- We will collect detailed personal information about you and other household members, including age, sex, date of birth, ethnicity, income, National Insurance number, income and benefits details, employment status, gender identity, relationship status, any disabilities, any communication and accessibility requirements, religion, sexuality, nationality, caring responsibilities, access to financial services such as banks and credit unions, bank details, benefits, council tax, medical information, details of any unspent criminal convictions.

This information is required as we will be unable to accept an application for services without it. Information on household members is required as Sparrow Homes have legal obligations to collect and retain information and it is also in our legitimate interests to know who will be living in our premises and to ensure the property offered is adequate for the needs of the household. We assume any information you provide about household members is provided with their full knowledge and you should direct your household members to this notice.

## Managing your tenancy or lease

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- Your contact details (telephone number and email address) so we can reach you when we need to discuss issues pertaining to your tenancy or lease, e.g. access for maintenance and improvements, if we need to arrange a home visit or to contact you in the event of an emergency or to enforce the terms of your tenancy/lease. We may need to provide your contact details and relevant associated information to our contractors who may be undertaking work on your property on our behalf.
- We will ask you for supporting documents to effect changes to your tenancy, such as a copy of your marriage certificate or deed poll certificate to change your name on our records or supporting medical evidence to reassess any change to housing requirements as a result of a medical need.
- We will hold records of all our contact with you, your contact with us, and any contact from third parties representing you or about you.
- Financial records about the amount of money you have paid us, any amount(s) outstanding and associated recovery action.
- We may hold information about your history, for example regarding credit status or criminal convictions, if we decide this is required.
- We also record information about repairs, maintenance, and servicing requirements of your home. We may need to provide this information in particular to our contractors
- We will also use your contact information to tell you about changes to Sparrow Homes, for example changes to our organisational structure and governance arrangements, and to resolve or investigate complaints.

The provision of this information is a 'contractual requirement'. Without this information, we may be unable to manage or provide your services. For example, we would not be able to discuss changes to your service if we do not hold your contact details. Please speak to us if you have any concerns.

## Confirming your eligibility for housing and prevent fraud and illegal sub-letting

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- We will ask for proof of ID e.g. for tenancy audits or when the housing composition changes, or a reasonable period of time has passed (this applies to all household members over the age of 18).
- We need to be able to verify your identity to provide services to you. Processing for the purpose of fraud prevention is required in order to meet our legal obligations.

## Meeting your needs in our service delivery

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- We record your support needs in our dealings with you and to improve our communications with you.

Where processing information about you or your household members, we may have a legal or contractual obligation to process this information for example to provide inclusive services. It is also in our legitimate interests to ensure that service delivery meets the needs of our service user and their household.

## Managing the legal process if you apply to buy your home or want to access another home ownership route

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This information is required to manage the legal process needed in preparation for entering into contractual relations.

## Assisting with personal security and prevention and detection of crime

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- We may capture your image on our CCTV systems if you visit an estate or office which is covered by this facility.

This information may be required to meet legal obligations and our legitimate business interests around health and safety and crime prevention.

## Understanding how we're performing

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- Our managing agents may undertake call recordings for training and quality monitoring purposes.
- We will carry out customer satisfaction surveys to help us monitor our performance and improve our services.

It is in our legitimate interests to understand how we are performing so we can meet our objectives.

## Keeping in touch with you

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We may wish to communicate with you and keep you up to date with events and news about the organisation which we think will be of interest or use to you.

## Prevention and detection of crime, and regulatory purposes

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We do this to meet our legal obligations and to further our legitimate interests.

## How we collect data about you?

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The information we hold about you comes from you or your household members, for example when you filled in your original application and signed up to your tenancy. We will also have any letters or emails you have sent to us, records of calls to the office and any feedback or permission forms you have completed. We also collect information in the form of Cookies and similar technologies from our websites.

## Who might we share your information with and why?

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Sparrow Homes operates through contracting with managing agents that are responsible for managing relationships with tenants on a day-to-day basis. This means that we will share information with the particular agent that is responsible for managing the home in which a tenant lives.

We sell our properties through partner agents who work on our behalf. We will share your information with the particular agent to enable you to buy a property from us.

We will not disclose personal information about you to other parties except where we have an appropriate lawful basis for doing so.

Your data may be shared within Sparrow Homes where it is necessary for staff to carry out their duties or to provide services to you. We may share your data with our contractors and suppliers so that we can carry out repairs and maintenance to your home or provide other services.

There may be situations in which we have or choose to share some of your information with other third parties including (but not limited to):

- The Police
- Legal advisers
- Social Services
- Benefits agencies
- Utility providers
- Emergency services
- Credit reference agencies

- Department for Work and Pensions
- Other Housing Associations or providers.
- Medical professionals
- Market research companies

Where we share data with a third party organisation or statutory agency we will ensure that the organisation or agency understands how the data is to be used, what information is to be shared and when it will be destroyed. We may provide more detailed information to you about any data sharing that takes place, or you can ask us for more information about it.

In some cases we may be legally required to provide information to one of these other organisations – for instance, in certain circumstances we may be required to provide information about housing benefits to a local authority or central government department.

Our staff are trained in data protection and know the importance of keeping your data safe and secure.

## Marketing

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With your consent (or because you have used or been interested in similar services from us previously), we may use your personal information in order to send you information about our services, promotions and events that we believe may interest you. We don't buy in lists of customers or contacts where information is about an individual.

With your consent we may share your personal information with our partner agents (including but not limited to Sales Agents, Financial Advisers, Mortgage brokers) and may use the information you give to us to provide you, or permit selected partner agents to provide you, with information about the developments and other products that are of interest to you.

If you are or represent a business, you may also receive an email from Sparrow Homes because we obtained your contact information from a reputable third party agency. We collect your basic identification and contact details. This may include for example your name, company, telephone number, and email address.

If you decide to opt-out of our marketing, we will no longer use your personal information for this purpose. You may opt out (or opt back in) at a later date. You have a right at any time to stop us from contacting you for marketing purposes. You can easily change or withdraw consent by clicking the 'unsubscribe' link at the bottom of each marketing email. You may also choose to stop receiving direct marketing communications from Sparrow Homes at any time by sending notice of your decision to Sparrow Homes using the following contact details [Sparrowsharedownership@sagehomes.co.uk](mailto:Sparrowsharedownership@sagehomes.co.uk)



## Sending personal information outside the United Kingdom and EEA

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Our business is based solely in the United Kingdom, but we have investors who are based in the United States. We will routinely share data with these investors. However, this is usually not customer data.

We may sometimes make use of cloud-based systems located outside of the EU to support the management of our business. Where this happens, we will ensure that there are appropriate safeguards in place to protect your data. We share marketing data with Google and Facebook for Shared Owners and prospective Shared Owners to help market our properties.

Sparrow Homes is a growing and evolving organisation. Where there is a request for sharing personal information overseas, we will ensure that it is robustly assessed on a case-by-case basis. We will ensure your Data Subject Rights and personal information is protected to the same standard as it would be in the United Kingdom.

## Anti-Money Laundering

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Sparrow Homes is required by law to comply with UK Anti Money Laundering Regulations (AML Regulations). Whether you are a new or existing customer, we may therefore need to verify your identity and your source of funds.

We may do this by:

- Requesting that you provide original or certified copies of identity evidence.
- Requesting that you provide necessary documentation to support proposed source of funds.
- Undertaking an electronic identity check using a credit reference agency to search information relating to you.

## How long we keep your data for

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We will only keep your data during our relationship with you and for a set period afterwards to allow us to meet our legal obligations, including resolving any follow-up issues between us (for example, if you are a tenant, we will hold information about you for the duration of your tenancy. If you move, and are no longer a resident we will usually keep records about you for no more than 6 years).

Please contact us if you would like any more information.

## Protecting your data

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We take the protection of your data very seriously. We have procedures in place to protect your data from loss, misuse, disclosure, abuse or destruction.

Where we share your data with third parties, such as contractors, we provide written instructions to them to ensure that your data is held securely and in line with data protection legislation. We do not allow our third-party service providers to use your personal information for their own purposes. We only permit them to process your personal information for specified purposes and in accordance with our instructions.

We do not normally undertake *“automated decision making”*

We do not normally undertake ‘automated decision making’ – that is decisions made about individuals without any human involvement.

## Your rights

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The law on data protection gives you certain rights in relation to the personal information we hold about you. These are:

- The right to be informed. This means that we must tell you how we collect and use your data (i.e. the details provided in this privacy notice).
- The right of access. You can ask to see the data we hold about you which we will provide free of charge (in most circumstances). A request to see this information is known as a ‘subject access request’ (“SAR”).

SARs do not need to be made in writing but we encourage you to put the request in writing so there is no confusion about what you are asking for. We also ask that your written request be accompanied by proof of your address and identity. If you require specific information, it is helpful if this is clear in your request, for example, information from a particular time period or about a specific piece of correspondence. If someone is requesting information on your behalf, they will need written confirmation from you to show you consent for us to release this and proof of ID (both yours and theirs).

We will provide a copy of the information requested free of charge. However, we can charge a ‘reasonable fee’ when a request is manifestly unfounded or excessive, particularly if it is repetitive. We may also charge a reasonable fee to comply with requests for further copies of the same information.

We will seek to provide you with the information you have asked for within one month to provide you with the information requested, although in certain circumstances it may take longer to provide you with some or all of the information you have asked for and we will try to keep you updated about this as promptly as we can.

- The right to rectification. You can ask for any inaccuracies to be corrected. If any of the data we hold about you is wrong you are able to ask us to correct it.
- The right to ask for erasure: to ask to have your information deleted. If you want us remove any of your data you can ask us to delete it from our systems where it is no longer necessary for us to keep it. Please be aware, however, that we may not need or be able to comply with such requests, depending on the circumstances. For example, if you are a current customer (with a Tenancy or a Lease with us) and you ask for an erasure of all your personal information we will not be able to grant this.
- The right to restrict processing of your data. You can ask us to stop using your data while we check that it is correct or complete.
- The right to object to the inclusion of any information if we are processing it based on a legitimate interest. You can tell us that you think the way that we use your data is wrong.
- The right to withdraw consent at any time. If we are relying on consent to use your personal information, then we must stop using the information. We can refuse if we can rely on another reason to process the information such as our legitimate interest
- The right to data portability allows you to copy or transfer personal information easily from one IT environment to another in a safe and secure way. The right only applies to personal information you have provided to us where we are relying on your consent or for the performance of a contract to use your information. It also only applies when processing is carried out by us using automated means.

## Changes to our Privacy Notice

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We keep our Privacy Notice under regular review and will place any updates on our website.

## Making a complaint

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If you are concerned about the data we hold, how we are processing it or if you would like to see the data we hold about you please contact us at [Sparrowsharedownership@sagehomes.co.uk](mailto:Sparrowsharedownership@sagehomes.co.uk).

If you remain dissatisfied, you have the right to refer the matter to the Information Commissioner. The Information Commissioner can be contacted at:

Helpline: 0303 123 1113

<https://ico.org.uk/concerns/>