Privacy Notice for Sales and Marketing

Who are we?

emh group is a non-asset owning parent company, with two largely ring-fenced functional divisions: emh Housing and Regeneration Limited, trading as emh, which is a Registered Provider regulated by the Regulator of Social Housing and emh Care and Support whose regulated activities fall within the remit of the Care Quality Commission.

Our Privacy Promise

We promise:

- To keep your data safe and secure
- Treat any data concerns you may have as priority

What is the purpose of this notice?

This privacy notice aims to give you information on how we collect and process your personal information on your journey with us. It makes you aware of how and why your personal information will be used, namely for the purposes of the performance of our contract with you as our customer. It provides you with certain information that must be provided under the UK General Data Protection Regulation ('the UK GDPR'), the Data Protection Act 2018 and any subsequent legislation.

This notice primarily covers how we use information relating to our residents, website visitors and people who interact with or do business with us by using our website. In these cases, we will be the "data controller" for the purposes of data protection law.

How We Use Your Personal Data

We only collect and use personal information where we have a valid legal basis for doing so. The sections below explain what data we process, why we process it, and the legal basis that applies. We may process your information for more than one lawful basis depending on the specific purpose for which we are using it.

Consent

We process the following information when you give us your clear permission:

- Marketing and communication preferences, so we can send you updates and information you have chosen to receive and include you in surveys or consultations you have opted into.
- Contact information you provide for alerts or newsletter sign-ups, such as your name and email address, so we can send the communications you have requested.

Contract

We process the following information when it is necessary to enter into or perform a contract with you:

- Application and transaction details, including your name, date of birth, previous address, contact details, financial information and supporting documents, so we can progress applications, form part of the sale or tenancy documentation, and manage your account with us.
- Profile details, reports you submit, feedback and survey responses, so we can provide services through your account, respond to requests, and manage our relationship with you.

Legal Obligation

We process the following information when required to comply with the law:

- Contact information and account records where needed to meet legal, regulatory, safeguarding, fraud prevention, and reporting requirements.
- Technical data such as IP address, browser type, device information and log data where needed to administer and protect our website and IT systems.

Legitimate Interests

We process the following information because it is necessary for our legitimate business purposes, and these interests are not overridden by your rights:

- Contact information, correspondence and enquiry details, so we can manage our relationship with you, respond to comments, compliments and complaints, and keep our records up to date.
- Technical data and website usage information, so we can improve our website, marketing, analytics, user experience, system security and maintenance.
- Account and profile information, so we can administer and protect our website and provide you with access to relevant services.

We only hold information about you for as long as it is needed for the purpose or purposes it was collected, or as required by law. Some examples of retention periods include application and transaction records for the life of the tenancy or lease plus 6 years, website technical data such as IP addresses for around 30 days after visiting the website, and marketing preference records until you unsubscribe or ask us to stop.

Artificial Intelligence

We use Artificial Intelligence (AI) and other AI-assisted technologies to support our administrative, analytical and service delivery functions. AI systems are used to help us organise information, identify patterns and improve the efficiency and accuracy of our processes.

Where AI is used, it operates under human oversight and is subject to safeguards to protect your privacy. We do not use AI to make decisions that have legal or similarly significant effects on you without meaningful human involvement.

When AI processes personal data, it is done on the basis of our legitimate interests in improving our services and ensuring they are delivered effectively, or on another appropriate lawful basis depending on the context.

You have the right to request human review of any decision supported by automated processing, to express your point of view, and to contest the outcome. For more information, please see the Your Data Protection Rights section of this notice.

Particularly sensitive information we may collect about you

How We Use Your Special Category Personal Data

Special categories of personal data require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have appropriate safeguards in place where the law requires this. The sections below explain what we process, why we process it, and the legal basis that applies.

Social Protection Law Obligation

We process the following information where required to meet our responsibilities as a social housing provider and to comply with regulatory and legal obligations:

- Details of unspent convictions or criminal offences, where relevant, so we can assess suitability for housing and manage risks to customers, neighbours, staff and contractors.
- Disability information, so we can meet our obligations under the Equality Act 2010, comply with regulatory reporting requirements, and identify or provide additional support services where appropriate.
- Ethnicity, religion, sexuality and nationality information, so we can carry out equality monitoring, comply with legal and regulatory requirements, and better understand and improve the services we provide.

When using our websites we collect four main types of information from visitors:

- Feedback (general questions and specific feedback on the website)
- Requests for information
- Survey responses
- Site usage information (from session cookies and log files)

We do not pass on any personal information you have given us to any other site. The system will record your email address, and other information if volunteered to us by you, for example on the Feedback forms. This will be treated as proprietary and confidential. The information will also be used to form part of the sale contract, should you proceed.

The website contains links to other websites. This privacy policy applies only to sites administered by emh. You should always be aware when you are moving to another site and read the privacy statement of any site which collects personal information.

Marketing (E-updates – new properties)

If you choose to subscribe to email alerts we will collect and store only the information you have given us regarding your email preferences. We use a service called Mail Chimp, which is an email address management and message sending service. Your data is stored by us via their services and will not be passed to any other party.

Mailchimp enables us to send marketing emails. Mailchimp is a US-based service provider and is covered under Intuit's certification to the EU-U.S. Data Privacy Framework, the UK Extension to the EU-U.S. Data Privacy Framework, and the Swiss-U.S. Data Privacy Framework. Mailchimp's Data Processing Addendum also includes Standard Contractual Clauses as a fallback safeguard for international transfers where required. See Mailchimp's privacy information for more details

From time to time we would like to send you information about services of ours and other members of the group we feel may be of interest to you.

Despite your consent to receive marketing information, should you change your mind you have the right, at anytime, to stop us using your information for marketing use by withdrawing your consent. Consent can be withdrawn by contacting us (see How To Contact Us below)

When do we share your information?

We will not normally share your information with anyone else. However, there are certain circumstances where we will be required to share your information with other organisations. We will comply with UK data protection law when disclosing this information. Where it is required or necessary in accordance with UK data protection law, we may disclose your personal information to the following categories of recipients:

Recipient/Category of organisation	Purpose of sharing
IT providers and platform providers	To provide data processing, hosting, support, analytics and website optimisation services to us.
Professional advisers, valuers, surveyors and service providers acting on our behalf	To progress applications, valuations, surveys, reservations, sales, property-related services and other services connected with our relationship with you.
Regulators, government bodies and law enforcement agencies	Where we are under a legal or regulatory obligation to provide information, or where sharing is necessary for safeguarding, fraud prevention, legal claims or the administration of justice.
Other companies within emh Group	To provide accurate support and coordinated services across the group where relevant to the services you receive.
Third parties involved in a business transfer, merger or reorganisation	If our business changes, the new owners may use your personal data in the same way as set out in this notice.

How do we keep your information secure?

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

All personal information you provide to us is stored on our secure servers within the UK. However, some of your personal information may be transferred to or accessed in the United States by service providers who help us deliver our services, including website, IT and email communication providers. Where we transfer personal information to the USA, we will do so in accordance with UK data protection law and will ensure that an appropriate transfer mechanism is in place, such as the UK Extension to the EU-U.S. Data Privacy Framework where the recipient is certified, or Standard Contractual Clauses and other appropriate safeguards where required..

We have put in place procedures to deal with any suspected data security breach and will notify you and the Information Commission's Office of a suspected breach where we are legally required to do so.

Privacy Notice updates

We may edit this policy from time to time. If we make any substantial changes, we will notify you by posting a prominent announcement on our web pages. This website and its contents are protected by copyright. The content provided on this website is for general information only.

Access to and correction of the information we hold about you

You can find out if we hold any personal information about you by making a 'subject access request' under the GDPR. If we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding it;
- Tell you who it has been disclosed to; and
- Let you have a copy of the information in an intelligible form.

You may also have the right for your personal information to be transmitted electronically to other organisations in certain circumstances.

You can access your personal information we hold by writing to our Data Protection Officer at this address: Emh, Governance & Assurance Team, Memorial House, Stenson Road, Coalville, and Leicestershire, LE67 4JP or by email on dataprotection@emh.co.uk

You have the right to question any information we have about you that you think is wrong or incomplete. Please contact us if you want to do this. If you do, we will take reasonable steps to check its accuracy and correct it.

Your rights

Under data protection law, you have rights including:

- **Your right of access** – You have the right to ask us for copies of your personal information.
- **Your right to rectification** – You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure** – You have the right to ask us to erase your personal information in certain circumstances.
- **Your right to restriction of processing** – You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- **Your right to object to processing** – You have the right to object to the processing of your personal information in certain circumstances.
- **Your right to data portability** – You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.
- **Your right to withdraw consent** – If the lawful basis for processing is consent, you have the right to withdraw that consent at any time. The withdrawal of your consent will not affect any use of the data made before you withdrew your consent, and we may still be entitled to hold and process the relevant personal information where we have another lawful basis for doing so.
- **Your right to object to direct marketing** – Where your personal data is processed for direct marketing purposes, you have the right to object at any time.
- **Profiling and automated decision making** – You have the right not to be subject to a decision based solely on automated processing, including profiling. We do not carry out automated decision making or profiling.

To exercise any of these rights, or if you require any further information about your rights, please contact us using the details in the How to contact us section below.

Complaints and your right to complain

We take any complaints we receive about the collection and use of personal information very seriously. We encourage you to bring it to our attention in the first instance if you think that our collection or use of information is unfair, misleading or inappropriate. You can make a complaint at any time by contacting us using the details in the How to contact us section below.

Under the Data Use and Access Act 2025, there is a right to complain to us first before taking your concern to the Information Commission's Office. We will do our best to investigate your concern and respond appropriately.

If you remain unhappy, or if you think our collection or use of personal information is unfair, misleading or inappropriate, or you have concerns about the security of your personal information, you also have the right to make a complaint to the Information Commission's Office at:

Information Commission's Office (ICO),
ICO Head Office,
4th Floor, No.3 Circle Square,
5 Hawkshaw Street,
Manchester,
M1 7BL

How to contact us

Please contact us if you have any questions about our privacy policy or the information we hold about you. You can do so via one of the contact details below;

- Email: dataprotection@emh.co.uk
- Post – Governance & Assurance Team, Memorial House, Stenson Road, Coalville, Leicestershire, LE67 4JP.
- Telephone - 01530276000

We have appointed a Data Protection Officer to oversee our compliance in line with Data Protection legislation. If you have any questions about this privacy notice or how we handle your personal information, please contact our Data Protection Department using the details above.

Use of Cookies

Our website uses cookies. By using our website, you agree to this privacy statement, and you consent to our use of cookies in accordance with the terms of this statement.

What are cookies?

Our website uses cookies. When you visit our website, you will be presented with a cookie banner that allows you to accept, reject or manage your cookie preferences.

We only place non-essential cookies on your device where you have provided your consent.

You can withdraw or amend your preferences at any time through our cookie preference centre.

emh Group uses OneTrust to monitor cookie use. The technology automatically scans a website to identify all trackers and allows organisations to generate a tailorable cookie consent banner, cookie preference centre and cookie list.

Why we use cookies

Cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not.

Cookies are specific to the server that created them and cannot be accessed by other servers, which means they cannot be used to track your movements around the web. Although they can be used to store information which may identify a computer, they cannot be used to identify you personally.

Ways we use cookies include:

- Recognising your device so you do not have to give the same information several times during one task
- Recognising that you may already have given a username and password so you do not need to do it for every web page requested
- Measuring how many people are using services so they can be made easier to use and there is enough capacity to ensure they are fast
- Our customer account service MyHomeOnline uses cookies to remember your font size preferences and help us identify that you are the only person accessing your account

Cookies used on this site

Google Analytics

We use Google Analytics to analyse the use of this website. Google Analytics generates statistical and other information about website use by means of cookies. The information generated relating to our website is used to create reports about its use which we can use to improve the site.

Cookies do not contain any information that personally identifies you. A cookie in no way gives us access to your computer or any information about you.

You can learn more about these small files and how to manage them yourself on www.aboutcookies.org