

# Privacy & Cookie Policy

## Website Privacy Statement

### 1 Purpose

- 1.1 This statement sets out our commitment to protecting personal data and how we implement that commitment with regards to the collection and use of personal data.

### 2 Scope

- 2.1 Our website is designed to comply with the UK General Data Protection Regulation 2018 and the Data Protection Act 2018 (referred together in this Statement as ‘the UK GDPR’ for ease of reference).

### 3 Aims and objectives

#### 3.1 Who is responsible for my information?

Octavia Housing (the “Data Controller”) is responsible for the collection, processing, storage, and safekeeping of any information you provide on this website and the information you provide will be managed in accordance with relevant legislation (e.g., UK GDPR).

#### 3.2 What information do we collect about you?

As part of delivering services to you, certain personal information we collect, and process will enable us to respond to your enquiry/interest in our service. This information is collected using cookies.

#### 3.3 How will we use the information about you?

We will use your information to respond to your interest in our services, respond to any enquiries you make and keep you updated with the latest news (marketing) and products/services.

#### 3.4 Who may we share your information with?

Information will be used across the organisation to ensure you are receiving all services you have requested; ensure your information is accurate and up to date and promote other products we offer and/or to keep you updated with the latest news.

We will not sell your information to any third parties, nor will we share your information except where we are required to by law.

## **4 Cookies**

### **4.1 Visiting our website**

- 4.1.1 When someone visits our website, we collect standard internet log information and details of visitor behaviour patterns, using Google Analytics (see section 4.3 - How we use Cookies). We do this to find out things such as the number of visitors to the various parts of the site.
- 4.1.2 We do not make any attempt to find out the identities of those visiting our websites. We will not associate any data gathered from this site with any personally identifying information from any source.
- 4.1.3 If we do want to collect personally identifiable information through our website, we will tell you. We will make it clear when we collect personal information and will explain what we intend to do with it.

### **4.2 What are Cookies**

- 4.2.1 Cookies are text files placed on your computer by websites you visit. These are widely used to enable the websites to work properly (e.g., ensuring that the right personal information collected is attached to the individual who submitted it) when collecting information that you have provided to the Data Controller. You may delete and block cookies if you wish from this site, however, please be aware that this could affect the functioning of this website. If you would like further information relating to cookies and what they do and how to delete them, please visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org)

### **4.3 How we use cookies**

- 4.3.1 Most web browsers allow some control of most cookies through the browser settings. 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](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org). To opt out of being tracked by Google Analytics across all websites please visit <http://tools.google.com/dlpage/gaoptout>
- 4.3.2 We use different types of cookies on our website. The table below contains the cookies we use, information about the cookie name, type, description and duration of the cookie.

Cookie	Type	Description	Duration
_site_session	Strictly necessary	This is the session cookie and is required for the operation of a website. It is used to make sure that the site runs smoothly as you move from page to page. It does not collect any identifiable information from your computer and are deleted when you close your browser.	Session
__cf_bm	Functional	This cookie, set by Cloudflare, a third-party service used on the Octavia website, is used to support Cloudflare Bot Management	30 minutes
_ga	Analytics	The _ga cookie, installed by Google Analytics, calculates visitor, session, and campaign data, and keeps track of site usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognize unique visitors.	2 years
_gid	Analytics	Installed by Google Analytics, _gid cookie stores information on how visitors use a website, while also creating an analytics report of the website's performance. Some of the data that are collected include the number of visitors, their source, and the pages they visit anonymously.	1 day
_gat	Analytics	This cookie is installed by Google Universal Analytics to restrain request rate and thus limit the collection of data on high traffic sites.	1 minute

#### **4.4 Third party cookies**

4.4.1 We sometimes embed video content and photos from websites such as YouTube and Flickr. Pages with this embedded content may present cookies from these websites. You should check the relevant third-party website for more information about these cookies.

#### **4.5 Accepting cookies**

4.5.1 For this site to function properly you will need to accept the Strictly Necessary Cookies referenced in section 4.3.2. Please be aware that if you do not accept these cookies, certain personalised features of this website cannot be provided to you.

### **5. Legislative/regulatory context**

#### **5.1 Access to your personal information**

5.1.1 Under the UK GDPR, you have a right to ask us what personal information we hold about you, and to request a copy of your information. This is known as a 'subject access request' (SAR). We have one calendar month within which to provide you with the information you have asked for (although we will try to provide this to you as promptly as possible).

5.1.2 Following on from your SAR, we will provide you with a copy of the information we hold that relates to you. This will not include information that relates to your property (if applicable) such as repair logs or details of contractor visits, as this is not considered personal information.

#### **5.2 Correction to your personal information**

5.2.1 If you need us to correct any mistakes contained in the information we hold about you, you can let us know by contacting the customer contact team on 0208 354 5500 or email [info@octavia.org.uk](mailto:info@octavia.org.uk)

#### **5.3 Restriction on processing**

5.3.1 You have the right to require us to stop processing your personal data. When processing is restricted, we are allowed to store the personal data but not further process it. You can do this where:

- You challenge the accuracy of the information (we must restrict processing until we have verified its accuracy)
- You challenge whether we have a legitimate interest in using the information
- If the processing is a breach of the UK GDPR or otherwise unlawful
- If we no longer need the personal data but you need the information to establish, exercise or defend a legal claim

5.3.2 If we have disclosed your personal information to third parties, we must inform them about the restriction on processing, unless it is impossible or involves disproportionate effort to do so.

#### **5.4 Objection to processing**

5.4.1 Individuals have the right to object to processing in certain circumstances. We must stop processing the personal data unless we can demonstrate compelling legitimate grounds for the processing, which override the interests, rights, and freedoms of the individual; or the processing is for the establishment, exercise or defence of legal claims by/against Octavia.

#### **5.5 Withdrawal of consent**

5.5.1 You have the right to withdraw your consent to us processing your information at any time. If the basis on which we are using your personal information is your consent, 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 interests.

#### **5.6 Security of your personal data**

5.6.1 We will use your personal data in a way which ensures appropriate security of the data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.

### **6 Disclosure of personal information**

6.1 In most circumstances we will not disclose your personal information without consent, except where we are required to do so by law.

6.2 However, there will be times when for example we investigate a complaint about a service, we may need to share personal data across Octavia and other relevant bodies.

6.3 You can obtain further information on:

- Information Sharing & Partnership Agreements we have with other organisations we work with to deliver services
- Circumstances where we could pass personal data without your consent (e.g. prevention or detection of crime)

### **7 Links to other websites**

7.1 This Privacy Statement only applies to this website and does not cover the links within this site to other websites. So, if you link to other websites, you should read their Privacy / Cookie Policies.

## 8 Contact for further information

8.1 Please contact us should you have any questions relating to this Website Privacy Statement or if you would like to make a Subject Access Request (SAR) to see what, if any, personal data we may hold on you.

Octavia

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Tel: 020 8354 5500

## 9 Changes to our Privacy Statement

9.1 This Privacy Statement will be reviewed from time to time to ensure that it continues to meet the needs of Octavia and is in line with current legislation.

## 10 Governance

<b>Consultation</b>	Chief Information Officer, Head of Information and Data Governance, Data Protection Officer
<b>Associated documents</b>	Privacy Notice
<b>Policy category</b>	Operational
<b>Approved by</b>	Chief Executive Officer
<b>Endorsed by</b>	Head of Information and Data Governance, Data Protection Officer
<b>Policy Owner</b>	Head of Information and Data Governance
<b>Date approved</b>	22/08/2023
<b>Date effective</b>	22/08/2023
<b>Next Review date</b>	22/08/2024

### Revision history

<b>Date of revision</b>	<b>Author</b>	<b>Revision detail</b>
31/07/2023	Laura Geanta, Head of Information and Data Governance	<ul style="list-style-type: none"><li>Added to section 4.3.2 all cookies used, alongside type, description and duration of each cookie.</li><li>Amended section 5.5.1 to specify which cookies need to be accepted for site to function (Strictly Necessary)</li></ul>

		<ul style="list-style-type: none"><li>• Amendments to wording and formatting in Section 5 to give a clearer overview of GDPR rights of Data Subjects</li></ul>
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