ASTER GROUP

Sarsen Court, Horton Avenue, Devizes, Wiltshire SN10 2AZ
0333 400 8222 www.aster.co.uk

Privacy Notice

Employees, job applicants, Non-Executive Directors / Independent committee members

1 Introduction

Aster Group is committed to protecting your personal data, being transparent about the data we hold about you and how we use it.

The purpose of this Privacy Notice is to give you a clear explanation about how Aster Group uses personal data we collect from you or about you in the course of applying for a role or working for Aster Group.

This Privacy Notice is applicable to all employees and Directors within Aster Group (collectively 'Aster Group') and its subsidiary companies. Companies within the group may issue a supplemental published employee privacy notice on their respective website, which provides additional information regarding company specific personal data processing and is provided by them, at the point of data collection and should be read in conjunction with this, "The Aster Group Privacy Notice".

Aster Group may process your personal data across our different Data Controller subsidiaries within the Group in the course of your employment but only where we have a lawful basis for doing so in terms of fulfilling your employment contract with us or where we have your explicit consent.

It is important for you to read this notice in full to understand what information we hold about you, how we may use it and how you can access, update and request to delete your personal data.

This Privacy Notice applies to information about:

- Job applicants,
- Employees,
- Non-Executive Directors and Independent Committee Members.

C&C LONDON HOMES SINCE 1926 enham trust EAST BORO HOUSING • CARE • SUPPORT

Aster Group is our over-arching corporate brand and comprises the following companies and charitable entities registered in England and Wales:
Charitable Registered Societies: **Aster Group Limited** No: 29573R. **Aster Communities** No: 31530R. **Aster Living** No: 29574R. **Aster 3 Limited** No: 7605. **Synergy Housing Limited** No: 31447R. **East Boro Housing Trust Limited** No: 16946R. **Central and Cecil Housing Trust** No: 27693R. **55 London** No: 7884. Charitable Incorporated Organisation: **Aster Foundation** No: 1198145.

Limited Liability Companies: **Aster Homes Limited** No: 06424046. **Aster LD Limited** No: 12341593. **Aster Property Limited** No: 04628065. **Aster Solar Limited** No: 09476337. **Silbury Housing Limited** No: 07276148. **Silbury Housing Holdings Limited** No: 07273905. **Central & Cecil Innovations Limited** No: 08904605. **Central & Cecil Construction Services Limited** No: 08904580.
Company Limited by Guarantee: **Enham Trust** No: 00173199 and Charity No: 211235. Public Limited Company: **Aster Treasury PLC** No: 08749672.

Registered office for **East Boro Housing Trust Limited** is **Faulkner House, 31 West Street, Wimborne, Dorset, BH21 1JS**. Registered Office for **Enham Trust** is **Enham Place, Enham Alamein, Andover, Hampshire, SP11 6JS**. Registered office for **Central and Cecil Housing Trust, 55 London, Central & Cecil Innovations Limited** and **Central & Cecil Construction Services Limited** is **Grace House, 26 Lodge Road, London NW8 7ER**. Registered office for all other businesses is **Sarsen Court, Horton Avenue, Devizes, Wiltshire, SN10 2AZ**.

We hold and use your personal data in line with **Data Protection** law. You can find out more in our **Privacy Notice** at **www.aster.co.uk/privacy.**

2 Our lawful basis for processing your personal data

Personal data

During the course of your employment contract, we will need to collect, store and process personal data you have given us, relating to your employment.

Any personal data we process about you will be done so in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 and other applicable legislation. Under this legislation personal data is defined as any information relating to a living person that can be used to identify that person directly or indirectly. Examples of personal data include but are not limited to:

Name, address, contact details	Telephone numbers, email and current, previous and forwarding addresses
Family details	Marital status, next of kin, authorised contact and children
Identification information	Age, date of birth, gender
National identifiers	National Insurance, social security, driving licence or passport number
Financial information	Income, bank account details and benefit entitlements
Economic situation	Employment or education details
Images and recordings	Photographs, CCTV images, films and telephone recordings
Online and device indicators	IP address or cookies, location data

Special category personal data

Under Article 9 UK GDPR, Special Categories of data include:

- Racial or ethnic origin,
- Political opinions,
- Religious beliefs, or other beliefs of a similar nature,
- Trade union membership,
- Physical or mental health or condition,
- Sexual life,
- Commission or alleged commission of any offence,
- Any proceedings for any offence committed or alleged to have been committed.

We process information related to your health and wellbeing and other special category data to ensure the health, safety and wellbeing of our employees, directors, and volunteers. The specific data processed is:

- Health and wellbeing information provided by you e.g. sickness records,
- Accident records, if you have an accident at work,
- Details of desk audits or workstation assessments, access or reasonable adjustment needs,
- Details of any protected characteristics that you have told us about.

We will only process this information where we have a lawful basis to do so and in line with our Equality and Diversity Policy. Aster endeavours to a working environment equally accessible to all colleagues without discrimination or prejudice. To allow us to monitor this, employee equality and diversity ('Special Category') data will be used for monitoring and statistical purposes and will be aggregated and anonymised.

Special Category data relating to you will not be used for individual measures or decisions or shared with others unless this specifically relates to supporting you in your position *e.g. reasonable adjustments or Wellbeing Plans*, and in this case, we will always tell you we are using your data in this way and seek your consent where necessary.

Legitimate interests

Where we rely on legitimate interests as our lawful basis, we have carried out legitimate interest assessments (LIAs) to ensure that our processing of your personal data is necessary and that your rights and freedoms are not overridden. This assessment helps us to balance our interests against any potential impact on you.

Our legitimate interests for processing your data include our use of CCTV to protect our property and employees, to monitor staff turnover, to develop work schedules, monitor IT usage, to communicate with staff and volunteers and to investigate any complaints. We will also process your data for performance appraisals and reports, in the event of redundancies and any disciplinary actions or if a critical incident occurs.

We are not required under the Data Use and Access Act 2025 (DUAA) to complete an assessment for the following 'recognised legitimate interests':

- Disclosures to public bodies, where it is asserted, personal data is necessary to fulfil a public function
- Disclosures for national or public security, defence purposes or emergencies
- Disclosures for prevention or detection of a crime, apprehending or prosecuting offenders and safeguarding vulnerable individuals.

We may process data for the above purposes.

Next of kin data

Where you have provided it, we may store contact details for your next of kin to be used in case of an emergency. We assume that you have provided this with their consent.

Job applicants

The ways in which we may use your personal data for various purposes related to your employment with us are listed in the table below.

Purposes For Processing	**Lawful Basis under UK GDPR Article 6** (Personal Data)	**Lawful Basis under UK GDPR Article 9** (Special Category Personal Data)
Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide who to appoint to a vacancy.	Legitimate interest (Art. 6(1)(f))	Special category data such as ethnicity may be collected as part of our equalities monitoring but this will be anonymised
Providing reasonable adjustments at recruitment and interview stages if you tell us you have a disability	Legal obligation (Art. 6(1)(c)) Equalities Act 2010	Specific rights in relation to employment under Article 9 (2) (b) UK GDPR.
We will need to process your data to enter an employment contract with you if we offer you a role.	Necessary for the performance of a contract (Article 6(1)(b))	N/A (No special category data is typically involved)
For certain roles we may need to assess your suitability to comply with our legal obligations regarding safeguarding vulnerable people, through DBS checks for example	Legal obligation (Art. 6(1)(c)) e.g. safeguarding	Employment, social security, and social protection law (Art. 9(2)(b)
We also need to process your data to ensure that we are complying with our legal obligations by checking your eligibility to work in the UK prior to employment.	Legal obligation (Art. 6(1)(c)) e.g. Immigration	N/A (No special category data is typically involved)
Providing details of referees	Consent	N/A (No special category data is typically involved)

Employees

The ways in which we may use your personal data for various purposes related to your employment with us are listed in the table below.

Purposes For Processing	**Lawful Basis under UK GDPR Article 6** (Personal Data)	**Lawful Basis under UK GDPR Article 9** (Special category Personal Data)
Paying and reviewing salary and other remuneration benefits	Necessary for the performance of a contract (Article 6(1)(b))	N/A (No special category data is typically involved)
Paying your pension	Necessary for the performance of a contract (Article 6(1)(b))	N/A (No special category data is typically involved)
Conducting appraisals, 1:1 reviews and other management interventions. Recording of meetings and/or conversations	Legitimate interest (Art. 6(1)(f))	N/A (No special category data is typically involved)
Providing appropriate health, medical and welfare support to support you in performing your role	Legal obligation (Art. 6(1)(c)) Equalities Act 2010 Vital Interests (Art. 6(1)(d)) - in case of emergencies only	Employment, social security, and social protection law (Art. 9(2)(b)) and Schedule 1, Part 1 (1) of the DPA 2018
Providing health assessments for night workers (if applicable)	Legal obligation (Art. 6(1)(c))	Employment, social security, and social protection law (Art. 9(2)(b)) and Schedule 1, Part 1 (1) of the DPA 2018
Lone Worker Risk Assessments	Legal obligation (Art. 6(1)(c))	Employment, social security, and social protection law (Art. 9(2)(b)) and Schedule 1, Part 1 (1) of the DPA 2018
Providing reasonable adjustments in the workplace including Personal Evacuation Plans if you have a disability	Legal obligation (Art. 6(1)(c)) Equalities Act 2010	Employment, social security, and social protection law (Art. 9(2)(b)) and Schedule 1, Part 1 (1) of the DPA 2018
Providing or arranging training, qualifications and funding relevant to your role	Necessary for the performance of a contract (Article 6(1)(b))	N/A (No special category data is typically involved)
Identifying you as an Aster employee, ID badges etc.	Legitimate interest (Art. 6(1)(f))	N/A (No special category data is typically involved)
Company vehicle tracking	Legal obligation (Art. 6(1)(c)) Legitimate interest (Art. 6(1)(f))	N/A (No special category data is typically involved)

Resource planning	Legitimate interest (Art. 6(1)(f))	N/A (No special category data is typically involved)
Providing references and information to future employers or other third parties such as landlords	Legitimate interest (Art. 6(1)(f))	N/A (No special category data is typically involved)
Providing information to governmental and statutory bodies (e.g., HMRC, HSE, DWP, Child Support, Courts)	Legal obligation (Art. 6(1)(c))	N/A (No special category data is typically involved, unless sharing health/disability info)
Providing information to third parties in the event of closure, merger, transfer, or takeover	Legitimate interest (Art. 6(1)(f))	Employment, social security, and social protection law (Art. 9(2)(b)) and Schedule 1, Part 1 (1) of the DPA 2018
Providing employee benefits and the Aster Offer	Necessary for the performance of a contract (Article 6(1)(b))	N/A (No special category data is typically involved)
Paying and reviewing salary and other remuneration benefits	Necessary for the performance of a contract (Article 6(1)(b))	N/A (No special category data is typically involved)
Paying your pension	Necessary for the performance of a contract (Article 6(1)(b))	N/A (No special category data is typically involved)
To use in legal processes, where necessary	Article 6(1)(f) - Legitimate interests	Article 9(2)(f) - Establishment, exercise or defence of legal claims
To monitor IT permission settings and user activity logs	Article 6(1)(f) - Legitimate interests	N/A (No special category data is typically involved)
To communicate with you and to share news about our organisation.	Necessary for the performance of a contract (Article 6(1)(b))	N/A (No special category data is typically involved)
For audit purposes	Article 6(1)(c) - Compliance with a legal obligation	N/A (No special category data is typically involved)

Non-Executive Directors & Independent Members

During the course of your appointment ('Agreement for Services') we may need to collect, store and process personal data you have given us, relating to your appointment. This will include, but is not limited to,

Purposes For Processing	**Lawful Basis under UK GDPR Article 6** (Personal Data)	**Lawful Basis under UK GDPR Article 9** (Special category Personal Data)
Paying or reviewing your remuneration and other benefits	Necessary for the performance of a contract (Article 6(1)(b))	N/A (No special category data is typically involved)
Conducting appraisal reviews	Legitimate interests (Article 6(1)(f)) – to manage the performance of NEDs and Committee members.	N/A (unless special category data is processed, in which case Article 9(2)(b) for employment law).
Providing reasonable adjustments if you have a disability or physical impairment	Legal obligation (Article 6(1)(c)) – under Equality Act 2010.	Article 9(2)(b) – necessary to comply with employment or social security law (Equality Act 2010 obligations).
Providing or arranging training relevant to your role	Legitimate interests (Article 6(1)(f)) – to ensure role competency and professional development.	N/A (No special category data is typically involved)
Identifying you as an Aster NED or Independent Committee Member (ID badges, photos)	Legitimate interests (Article 6(1)(f)) – to identify NEDs and members for security and business purposes.	N/A (No special category data is typically involved)
Publishing your membership details, name, Board Member role, biography on website	Legitimate interests (Article 6(1)(f)) – transparency about Board membership.	N/A (No special category data is typically involved)
Publishing details and minutes of Board meetings (which will include your name)	Legal obligation (Article 6(1)(c)) – necessary for corporate governance and regulatory compliance.	N/A (No special category data is typically involved)
Providing information to governmental, regulatory, and statutory bodies	Legal obligation (Article 6(1)(c)) – for regulatory compliance (e.g., NHF Register of Directors).	N/A (No special category data is typically involved)
Providing information to third parties in the event of closure, merger, or transfer	Legitimate interests (Article 6(1)(f)) – necessary for business continuity and restructuring.	N/A (unless special category data processed, in which case Article 9(2)(f) – legal claims).

3 How we share your personal data and who has access

We may need to share your personal data in the course of your managing your application, employment or appointment. This may be with suppliers carrying out services on our behalf, such as IT suppliers or statutory / regulatory bodies such as His Majesty's Revenue and Customs (HRMC) for example.

Where we appoint third parties to process your data on our behalf (known as our 'Data Processors' we will always ensure they have effective measures in place to comply with data protection law and only use your data in accordance with our instructions. We do this by way of a Data Processing Agreement.

Third parties will not be allowed to use your personal data for their own purposes, and we do not sell your information to others.

Job applicants

When you apply for a job at Aster we may share your data with:

- Our online recruitment system (Cornerstone) - to enable you to apply for a role and to communicate with you regarding the progress of your application.
- Online assessment tools (specific roles only) - to further assess your suitability for a role.
- The recruiting manager and interview panel - to conduct the selection and interview process.
- Our People Team - to facilitate the recruitment process.
- Your former employers - to obtain the necessary references for you.
- Professional bodies - to confirm your registration or membership with these where applicable.
- If applicable to your role, we may share special category data (e.g., health or criminal conviction information) with an Independent Safeguarding registered body to assess your suitability for working with children and vulnerable adults. This is done in compliance with our legal obligations under safeguarding legislation and the UK GDPR.

Employees

We are required by law to provide data relating to your employment to statutory agencies such as HMRC, Department of Work and Pensions (DWP), Health & Safety Executive (HSE), Child Support Agency (CSA), Courts Service.

In the course of your employment, we may also share your data with third party agencies acting on our behalf (our 'Data Processors') such as training providers, software providers, pension, or other benefits providers. Any such parties are only permitted to act on our instructions and in accordance with data protection legislation and will always be covered by way of a Data Processing Agreement.

We may also share your data with third parties such as prospective employers or letting agencies for reference purposes if requested.

Third parties will not be allowed to use your personal data for their own purposes, and we do not sell your information to others.

If applicable to your role, we may share special category data (e.g., health or criminal conviction information) with an Independent Safeguarding registered body to assess your suitability for working with children and vulnerable adults. This is done in compliance with our legal obligations under safeguarding legislation and the UK GDPR.

To comply with our legal obligations under our Transport Operator's Licence, we may need to share information about driving convictions for employees in certain roles. This processing is necessary to ensure compliance with relevant transport and safety regulations.

We may need to share medical information with contracted third-party medical advisory bodies where necessary to support your role or health needs, such as conducting health assessments for night workers or managing a recuperative work plan due to ill health. This is done in accordance with our obligations under employment and health & safety laws and will always be handled with the highest level of confidentiality.

We offer various colleague welfare support options, including colleague support networks and third-party counselling services. In these cases, we do not share your personal data with the providers. Instead, you share your data directly with them. We ensure that these providers adhere to strict data protection principles, and any information you give is treated in strict confidence and used solely for the intended purpose.

Non-Executive Directors and Independent Members

We are required by law to provide data relating to your appointment to statutory agencies and regulatory bodies such as the Regulator of Social Housing (RSH), HMRC, Companies House, Financial Conduct Authority (FCA), National Housing Federation (NHF)and Charity Commission.

During your appointment, we may also share your data with third party agencies acting on our behalf (our 'Data Processors'). Any such parties are only permitted to act on our instructions and in accordance with data protection legislation.

Third parties will not be allowed to use your personal data for their own purposes, and we do not sell your information to others.

International data transfers

At the current time Aster do not directly store or process data outside of the UK / European Economic Area (EEA).

When it is necessary for us to transfer your personal data outside of the UK/EEA (for example, where we are using a data processor) this will only be done in accordance with the UK GDPR. This could include:

- Adequacy regulations,
- International Data Transfer Agreement (IDTAs),
- UK-US Data Bridge,
- An exception as defined in Article 49 of the UK GDPR.

If you would like more information about the appropriate safeguards, please contact us at dataprotection@aster.co.uk

4 Other uses of personal data relating to your employment

Employee Benefits

Aster employees can choose to opt into various benefit schemes provided by third-party providers. Aster will only signpost you to these third parties, and they will act as the 'Data Controller' for any personal data you provide. Aster will not receive any personal data from these providers unless it has been aggregated and anonymised for statistical purposes or shared for payroll processing purposes where necessary.

Driving Aster fleet vehicles

If your role at Aster involves driving a fleet vehicle, e.g. a works van, you should be aware that Aster uses vehicle tracking devices within its fleet, known as telematics. Aster fleet vehicles are not authorised for private use.

Within Aster, the purposes for using these devices include-

- Requirement of our Transport Operators Licence,
- Working Time Directive: monitoring the number of hours the vehicle has been in use, to ensure operatives are not working excessive hours,
- Health & Safety: enabling the location of lone working operatives to be pinpointed should there be any concerns for their welfare,
- Taxation: ensuring vehicles are not being used for private purposes as this has tax implications for individuals,
- Emergency work allocation: in the event of an emergency trackers allow Aster to deploy the nearest available vehicle to the address,
- Identifying the unauthorised use of vehicles outside of agreed working hours or location.

We use this information in the following ways:

- To encourage you to drive safely and legally, the company will make drivers aware when they have driven in a way that might impact theirs or others personal safety or where the driving standards are felt to be below the legally required standard.
- To help us reduce fraud, by checking if another individual is attempting to make a false claim against you, or if you are making a false claim.
- We will only share your driving information with you your managers and our trusted business partners who support us in meeting our road safety and transport strategy.
- We will not release your driving information to the police or to any civil authorities unless we are required to do so by law, or we suspect a criminal activity such as fraud or attempted fraud may have occurred.
- To help us benchmark the reported data for all company vehicles and will use this to report driver performance at individual or business unit levels.
- We will use your location and driving information to maximise operational efficiency and to inform any management interventions. We are committed to being open and transparent about how telematics is collected, used and protected, this ensures that all colleagues have clear visibility of its purpose.
- We will make each driver's individual data available to them via the Driver MobiApp, so that they can view, interrogate, and improve their driving standards by increasing their awareness of potentially high-risk driving activity.

The police and certain statutory and/or authorised bodies may request information collected via the telematics relating to road accident investigations and the prevention or detection of crime. Such information may currently only be obtained by these organisations via an application to the Courts and we will not provide any information to these organisations except when subject to a Court Order.

For more information please visit the Aster Group Driver Handbook

Driving your own vehicle for work purposes

If you drive your own vehicle for work purposes, known as our 'Grey Fleet', under our Grey Fleet Policy your personal data will be processed in order to ensure you, and your vehicle are compliant with the policy. We currently use a third-party data processor to conduct these checks on our behalf and you will be required to share personal data to their online platform.

Employee Surveys

We may ask for your feedback to improve your experience as an Aster employee. Any feedback you provide will be anonymised before use and will not be recorded in your employee file. Your participation is voluntary, and the data will be used solely for the purpose of enhancing the employee experience at Aster.

Promotional photographs, videos and articles

During your employment at Aster, our Communications and Marketing teams may capture promotional photographs, videos or create articles relating to your role or team or the organisation. These may be used in publications and marketing on the Aster Group websites, our social media and video platforms, and other internal or external communications, both digital and print (such as brochures, banners, leaflets and flyers).

For individual photographs we will process these using the GDPR lawful basis of your Consent. We will remove any images from our database where you are the key figure within 2 years of you leaving the organisation*.

For group or larger event photographs and videos we will process these using the GDPR lawful basis of legitimate interests (capturing, promoting and marketing our organisation) and we will make every effort to make you aware at the time that photographs or videos are being captured. If you appear in a group photo or video, it may continue to held in our image database to be used for up to 6 years, after which it will be destroyed* unless we maintain it for archiving purposes.

We may also keep images of particular organisational, cultural or historical interest in our image archives for a longer period within an images 'archive'.

**Please note that images in print, electronic publications or social media previously distributed may continue to exist beyond this timeframe.*

You have the right to object to the use of your image at any time. Please contact us if you wish to exercise this right at communicationsteam@aster.co.uk.

Electronic communications - Aster managed

All communications sent or received via Aster-managed communication channels and devices (e.g. email, phone, instant messages, Aster Group social media pages and post), including any personal communications, are treated as Aster Group's property and not private. These communications may be monitored, intercepted, and read by Aster Group for the purpose of ensuring compliance with company policies, legal obligations, and business purposes.

We aim to ensure that any monitoring is proportionate and carried out in accordance with applicable data protection and privacy laws. Employees are advised to limit personal use of company devices and channels. For more information, please review our IT Security & Usage Policy, IT Usage Guidance and Data Protection, Privacy & Confidentiality Policy.

Electronic communications – third party platforms

Aster Group may use third-party communication, video and social media platforms to conduct business activities related to sales, engagement and promotion, where in-house applications are not appropriate. In such cases, either Aster Group or the third-party

platform will act as the Data Controller for any personal data shared on the platform, and its privacy policy will apply. Aster Group does not control how these platforms process your data, and employees should use these platforms in accordance with Aster Group's IT Security & Usage Policy, IT Usage Guidance and Social Media Guidance.

Please be aware that the personal data you share on these platforms may be processed, stored, or transferred outside the UK, subject to the platform's data protection practices. Aster encourages employees to review the privacy policies of any third-party platforms they use.

5 How long we keep your personal data for

Job applicants

If you are successful in your job application, personal data gathered during the recruitment process will be transferred to your employment file and retained for the duration of your employment and will be covered under our privacy notice for employees.

If your application is unsuccessful, the data you have provided as part of your application will be kept for 18 months after which time it will be securely destroyed. It will not be used for any other purpose.

Employees

Aster Group will only keep your personal data for as long as it is absolutely necessary for the purposes for which they were collected. Typically, where data is collected for your employment, we will keep hold of this data until the end of your employment plus 6 years.

Aster Group have policies in place to guide our retention of your personal data, using guidelines published by the Chartered Institute of Personnel and Development (CIPD) to fully inform the retention periods set.

If you would like more information on Aster's retention periods, you can request to see our retention schedule on the contact details under '**How to Contact Us'**.

Additionally, it is important to ensure that the personal data we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you move home or change your phone number or email address.

You may view and update your personal data within our people system, through your leader or the People Team.

Non-Executive Directors and Independent Members

The information you provided both during your application process and the course of your appointment will be stored in your Aster file for the duration of your position. If you leave your position with Aster it will then be retained for 6 years after which time it will be securely destroyed, unless there is a legal reason for retaining it.

We are required by law to keep company registrations and some regulatory returns to bodies such as Companies House, HMRC, FCA, Regulator of Social Housing, Homes England, Charity Commission permanently and these may contain your personal details such as your name, date of birth and address. This data will also be held by these bodies as Data Controllers.

You may view and update your personal data through the Governance Team at governance@aster.co.uk.

If you want more information on our retention schedule, please contact us at dataprotection@aster.co.uk .

6 Data Security

We take the protection of your personal and employment data very seriously. We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of personal data and ensure all personal data is stored securely.

We limit access to your personal data to specific employees *(for example People Team, Payroll, your leaders)* and other third parties who provide employment related services on our behalf (such as occupational health or pension providers). They will only process your personal data on our strict instructions and are subject to a duty of confidentiality, providing adequate security measures. The level of access a member of staff has to your personal data and employment file is dependent on their role. Aster Group staff undertake mandatory information security training, and at set intervals thereafter to ensure that they understand their responsibilities.

You may view and update your personal data within Dayforce or through your leader or the People Team.

Use of AI Tools in Business Processes

We may process personal data from documents or databases using approved AI tools to enhance the efficiency, quality, and speed of our operations. These tools automate existing manual processes, allowing us to allocate resources more effectively.

All users of AI tools are required to handle personal data in compliance with UK GDPR and Aster's Data Protection and IT Security policies.

Approved AI Tools

"Approved AI tools" refer to software operating within Aster's secure network or provided by vetted external suppliers (Data Processors).

AI Suppliers

Any AI supplier with access to personal data undergoes a compliance assessment before processing begins. Aster remains the Data Controller, and suppliers act as Data Processors under GDPR. We maintain signed agreements with all suppliers to ensure lawful and secure data handling. Suppliers are not permitted to use personal data for their own purposes, though anonymised data may be used for analytics or software development.

Automated Decision-Making

In accordance with your data protection rights and the Data (Use & Access) Act 2025, AI will not be used to make decisions about individuals without human oversight. All AI-generated outputs are reviewed and approved by a person before any decision is made.

For details on your individual rights, please refer to Section 7 of our Privacy Notice.

7 Your individual rights under data protection law

You have the following rights including:

Right of access	Under GDPR, you have the right to ask us what personal data we hold about you and to request a copy of this information. This is known as a 'Subject Access Request' (SAR). We can best understand and support your request if it is made in writing, please provide us with enough detail to locate the personal data you require, the more specific you are with what you are looking for, the quicker we are likely to be able to respond with the requested personal data. In response to SARs, we will provide you with a copy of the personal data we hold that relates to you.
Right to rectification	You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. We ask that you support us in this by informing us of any changes to your personal details or circumstances where relevant. If Aster has disclosed the personal data in question to others, for example, other Housing Associations, or your Local Authority, we must contact each recipient and inform them of the rectification - unless this proves impossible or involves disproportionate effort. Aster will respond within one month unless the request for rectification is complex. If we are not taking action in response to a request for rectification, Aster will explain to you why, informing you of your right to complain to the supervisory authority and to a judicial remedy.

Your right to erasure	You have the right to ask us to erase your personal data in certain circumstances. This could be for a variety of reasons such as there is no longer a reason for us to process your data or simply that you have withdrawn your consent, or that you no longer have a service agreement with us, or have left our employment. This right will be upheld providing there is no legitimate or statutory (lawful) reason for Aster to retain the data. You should be aware that if you decide to withdraw your consent, whilst you still have a tenancy, other service agreement or are employed with us we may not be able to continue to supply you with services or employment. If our legitimate interests require us to retain this data we can lawfully refuse your request. As the 'Data Controller' it is also our responsibility to notify any third parties processing data on our behalf ('Data Processors') if you request to have data deleted.
Your right to restriction of processing	You have the right to ask us to restrict the processing of your personal data in certain circumstances. We will respond to any reasonable requests that are not unfounded or excessive, or unless there is a lawful basis to continue processing.
Your right to object to processing	You have the right to object to the processing of your personal data in certain circumstances.
Your right to data portability	You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances. In line with the digital age, it allows them to move, copy or transfer personal data digitally from one IT environment to another in a safe and secure way, without hindrance to usability.
Your right to withdraw consent	If the lawful basis for processing is consent, you have the right to withdraw that consent at any time. Please note however that 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 data to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain services to you.
Your right to object to direct marketing	Where your personal data are processed for direct marketing purposes, you have the right to object at any time to processing

	of your personal data for marketing, which includes profiling to the extent that it is related to such direct marketing.
Automated decision making	Your also have the right to object to and not to be subject to a **decision based solely on automated processing** including profiling. We will apply appropriate safeguards such as meaningful human review where required.

Submitting a request to us

You may submit a request by,

Email: dataprotection@aster.co.uk

Phone: 0333 400 8222

Post: Data Protection Officer, Risk & Compliance, Aster Group, Horton Avenue, Devizes, Wiltshire SN10 2AZ

How long will my request take?

By law we must reply to your data rights request within 1 month. However, failure to provide proof of identity may delay the processing of your application.

Once we have confirmed your identity, we will send you a letter to acknowledge receipt of your request and let you know the date the information will be sent to you.

If your request is complex, we may need to extend the deadline by up to 2 months which is permitted under data protection law.

If your request is being submitted by a third party (e.g. a solicitor or relative) on your behalf, the request must be accompanied by a signed authority to confirm that they have permission from you.

How much does it cost?

There is no charge for submitting a Data Rights Request.

More information

For more information on your data rights please visit https://ico.org.uk/for-the-public/

8 Making a complaint

Making a complaint about Data Protection and the use of your data

Complaints relating to data protection and the use of personal data should be directed to dataprotection@aster.co.uk .

If you aren't happy with how we have handled your data protection complaint, you can escalate your concerns to the Information Commission's Office. They recommend you address your complaint with us in the first instance to give us an opportunity to put it right.

For more information visit https://ico.org.uk/make-a-complaint/data-protection-complaints/data-protection-complaints/

9 Contacting us

If you have any queries regarding this Privacy Notice, please contact us:

Email: dataprotection@aster.co.uk

Phone: 0333 400 8222

Post: Data Protection Officer, Risk & Compliance, Aster Group, Horton Avenue, Devizes, Wiltshire SN10 2AZ

10 Changes to our Privacy Notice

We may update this Privacy Notice from time to time by posting an amended version on our website, so we recommend periodically checking this policy. If at any time we need to use your personal data in a different manner then was stated at the time it was collected, we will notify you directly via email or your preferred communication method.

Version control

V1.0	Updated Aug 2025	Superseded
V1.1	Updated Sept 2025	Superseded
V1.2	Updated Jan 2026	Superseded
V1.3	Updated Apr 2026	Superseded
V1.4	Updated Sept 2026	Current version