ASTER GROUP

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

Privacy Notice - Customers

Contents

		Page
1	Introduction	2
	Who we are	
	ICO registration and Data Protection Officer	
	How we manage your personal data	
2	Who we collect personal data about	4
3	How we collect your personal data	5
4	Our lawful basis for processing personal data	6
	Legitimate interests	
	Special category personal data	
5	Types of personal data we collect	8
6	How we share your personal data	12
	International data transfers	
7	How long we keep personal data for	16
8	Security of your personal data	18
9	Children's personal data	19
10	Communication, marketing and our websites	19
	Direct communication & marketing	
	Sharing data	
	Opting out of marketing	
	Our websites and use of cookies	
11	Social media	22
12	NHS National Data Opt-Out	23
13	Non-customers	23
14	Your individual rights under data protection law	25
15	Making a complaint	28
	Making a complaint about our services	
	Making a complaint about data protection and the use of your data	
	Making a complaint to the Data Protection Regulator (ICO)	
16	Contacting us	29
17	Changes to our Privacy Notice	29

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.**

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.

We play a big part in the communities in which we are based – we may have interactions with people who would not normally expect to deal with us; this is because we do not just provide homes, we also provide many other services.

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.

This is the main Privacy Notice for Aster Group. However, some of our products and services provided by subsidiaries within our Group may have additional privacy policies so you should read these when you sign up for these services.

It is important for you to read this Privacy 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:

- Tenants, customers, non-customers, website visitors, and other service users for example garage account holders,
- Members of the public that may have cause to deal with Aster in relation to a land or property issue.

In using our website and our services, you are consenting to us collecting and using personal data about you as explained below in accordance with this Privacy Notice. Should we choose to change these terms for any reason, the changes will be posted here so that you are always kept informed about the collection and use of your personal data, and when we disclose it.

This Privacy Notice will be updated to reflect changes either to the way we operate or changes to data protection legislation. To make sure that you keep up to date, we suggest that you revisit this notice from time to time.

Who we are

Aster Group Limited is a housing association which provides quality and affordable homes as well as care and supported living services to thousands of people across the south of England and London. Our company registration number is IP29573R, and our registered address is Sarsen Court, Horton Avenue, Cannings Hill, Devizes, Wiltshire, SN10 2AZ, United Kingdom.

This is the Privacy Notice for Aster Group Ltd and subsidiaries (collectively “Aster Group”), including the subsidiary companies within the group listed below. Each subsidiary company within the Group may issue a supplemental published privacy notice on their respective website, providing 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”.

For the purpose of this Privacy Notice, Aster Group Ltd (herein “we”, “us” “our” or “Aster Group”) and the companies (herein “subsidiaries” or “companies“) within the Aster Group gather and process personal data in accordance with this Privacy Notice, and any published supplemental Privacy Notices on Group company websites, in compliance with the relevant United Kingdom (UK) data protection laws.

This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why, and when we process your personal data.

Aster Group may process your personal data across our different Data Controller subsidiaries within the Group in the course of delivering a service to you, for example centralised financial services or linking different services received by you together for a better customer experience.

Each subsidiary is registered with the Information Commission’s Office (ICO) as a Data Controller and your data will only be shared across the Group where we have a lawful basis for doing so.

ICO registration & Data Protection Officer

- Aster Group Z9842654
- Aster Communities Z2964186
- Aster Property Z9436053
- Aster Living Z9435976
- Aster Homes Z2708504
- Aster Foundation ZB328170
- Aster 3 ZA273995
- Synergy Housing Z2945053
- East Boro Housing Trust Z7403861
- Central and Cecil Housing Trust Z7452516
- Enham Trust Z5492486

Our Group Data Protection Officer (DPO) is Nicola Miller, Head of Risk and Compliance. To contact us regarding our use of personal data, you may email us at dataprotection@aster.co.uk or telephone **0333 400 8222**.

How we manage your personal data

Your personal data will be processed in accordance with the principles of UK data protection law. This means it will be:

- Processed lawfully, fairly and in a transparent manner,
- Collected for specified, explicit and legitimate purposes,
- Adequate, relevant and limited to what is necessary,
- Accurate and where necessary kept up to date,
- Kept in a form which permits identification for no longer than is necessary for the purposes for which it was processed, and
- Processed in a manner that ensures appropriate security of the information we hold.

2 Who we collect personal data about

We collect and hold personal data about:

(i) **Our customers** – this includes current, former and potential customers (including members of their family and people associated with them) who live in our properties[1], access our support and other services. This will include customers who:

a. Have a housing tenancy with us,
b. Have a shared ownership home with us,
c. Buy a home outright from us,
d. Have a leasehold property with us,
e. Have a private property subject to service charges through us,
f. Rent a garage from us,
g. Receive a disabled adaptation from us,
h. Receive sewerage and water services from us,
i. Have any other enquiry or make a complaint to us.

(ii) **Visitors** – visitors to our offices, schemes, sites and websites, those who email, call, message us via social media application or write to us, including anyone who makes a complaint or enquiry to Aster Group.

(iii) **Care & supported living residents** across our Aster, Enham, Central & Cecil and East Boro homes and schemes (see separate Privacy Notice)

[1] In our Aster, Enham Trust, Central & Cecil or East Boro homes and schemes

(iv) **Service users, visitors volunteers and donators to Enham Trust** (see separate Privacy Notice)

(v) **Service users, volunteers and donators to the Aster Foundation** (see separate Privacy Notice)

(vi) **Our employees, applicants and Directors** (see separate Privacy Notice)

3 How we collect your personal data

Personal data is any information about a living individual from which that person can be identified.

We may collect information in a variety of ways including:

- Directly from you, including when you apply for one of our properties or services, complete one of our forms, when you write, email or meet with us, or respond to a survey. We may also process information that you post on social media about us if it relates to a situation that we need to be aware of and/or take action on or by corresponding with us (by phone, email, chatbots, virtual agents, video triage, live chat agents or by joining as a customer),
- Through our ongoing contact and correspondence with you, and with other support agencies which relate to you, and from people associated with you such as family, friends and neighbours who you have given authorisation for us to speak to,
- When you communicate with us,
- When you set up a tenancy, buy a home or start other service with us,
- From your Local Authority Choice Based Lettings Team when you enquire about a tenancy or from government scheme agencies that provide aid with affordable home ownership,
- Details of your bank account when you make payments to us,
- When you use our services and give your name and e-mail address to make a comment about our services or website,
- When you apply for a service with us, we may use third party verification tools/providers to confirm your identity,
- When you call our Contact Centre, or we call you,
- When you visit a scheme or offices, we may also have Closed Circuit Television (CCTV) surveillance cameras to record events in public areas,
- Most information we hold will be collected from you directly, however we may from time to time collect information from third parties such as Local Authorities, NHS, courts, police, social services, family members,

neighbours, members of the public, employers, and other agencies such as DWP.

Note: if you provide us with personal data relating to members of your family or your associates, we will assume that you do so with their knowledge and consent.

We will only collect the information necessary to fulfil our obligations to you and in accordance with the General Data Protection Regulation (GDPR) lawful bases set out below.

4 Our lawful basis for processing personal data

Under data protection legislation we can only use your personal data for certain reasons and where we have a lawful basis to do so. The most common lawful bases we rely on are below.

GDPR Article 6 lawful basis	Examples
Processing is necessary for the performance of a contract	• Processing applications and requests for, but not limited to, rental accommodation and home ownership • Managing tenancies including collecting rent and service charges • Ensuring compliance with the conditions of any agreement between us • Providing repairs, maintenance, and adaptions at our properties • Providing home ownership products • Providing care and support for elderly and vulnerable customers
Processing is necessary for compliance with a legal obligation to which the data controller (Aster Group) is subject	• Preventing and detecting crime and resolving disputes • Preventing and detecting fraud and money laundering • Promoting safety and the quiet enjoyment of our neighbourhoods and communities • Promoting equal opportunities and fair treatment for all our customers and colleagues • Meeting our regulatory obligations
Processing is necessary for the legitimate interests of	• Monitoring, analysing, delivering and improving our services to you and household members

either the data controller or the individual	• Ensuring the proper management of your tenancy and give you appropriate support where needed • Assisting you in the management of account charges, payments and arrears including through our online portal • Providing information about support or services to allow you to better manage your home • Responding to your enquiries, keep in touch with you to understand your needs and preferences • Improving our services through monitoring and feedback • Promoting our products and services and invite you to events capturing images of these events
Processing is necessary to protect the vital interests of you, your family or others.	• In an emergency situation
You have given us explicit consent	If none of the above lawful bases apply we will seek your consent to collect and use your personal data such as cookies on our website, referrals for additional services or support, or to further tailor services to your specific needs. If we do this, we will always ask for your consent first. This may be written or verbal. Where we are processing your personal data based on your consent, you have the right to withdraw that consent at any time. This may affect the services that we can make available to you,

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.

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.

Special category personal data

Special categories of personal data (health, disability, ethnicity, sexual orientation, criminal convictions) require higher levels of protection. We need to have further justification for collecting, storing, and using this type of personal data. We will only collect and process special category data where we have an additional lawful basis under GDPR Article 9 for doing so.

We may process special categories of personal data in the following circumstances:

GDPR Article 9 lawful basis	Examples
Where we need to carry out our legal obligations in field of social security law or social protection	• Safeguarding of individuals at risk of harm • Supporting Local Authorities in their statutory obligations
Where there is a substantial public interest with a basis defined by the Data Protection Act 2018	• Protecting the public, preventing unlawful acts
Where we need to protect the vital interests of you or another person	• In an emergency situation
With your explicit consent	• Where you have told us you want us to process this information
Less commonly, we may process this type of information where it is needed in relation to legal claims or where you have already made the information public.	

5 Types of personal data we collect

The personal data we collect will depend on our relationship with you and the services we are providing.

This section covers the types of customers mentioned above in section 2(i) and sets out the types of information we may collect from you. The level and type of information collected will vary depending on the service you are receiving from Aster.

Depending on the type of service you receive from us, **we will only collect the minimum amount of personal data that we need to deliver that service** and will ensure that we have a lawful basis for collecting using or sharing any personal data that we hold about you.

For Care & Supported Living customers, please see our additional Privacy Notice

When you apply to become an Aster Group tenant, we will obtain information to determine your specific housing needs.

You will provide us with information through your housing application form. We will also use information from third parties such as other housing providers/private landlords, your mortgage lender (if you own/have owned your own home), the police, the probation service, support workers, social workers, mental health workers and credit reference agencies where appropriate to help us to assess your application.

If you purchase a home subject to an Aster leasehold or service charges we will also need to collect some information about you. This may be provided by you directly or by your solicitor to us.

We may collect the following personal data about you:

Types of personal data	We use it for
Name and contact details (including email, telephone numbers and your current, previous and forwarding addresses)	• Validating your identity • Communicating with you and keeping you informed about your tenancy/service and services we offer which may be useful to you • Communicating with you about the Aster Group and any changes that affect you • Asking you for feedback about our services, and how they can be improved • Sending you marketing communications (where you have opted in to receive them)
Identification information (including your date of birth and gender) such as birth or marriage certificate	• Confirming your identity when you apply for a service, call or interact with us • Processing your tenancy application, house sale or purchase
Unique ID (including photographic ID) such as National Insurance (NI) number, driving licence or passport	
Photographic ID and/or signature	
Family details (including next of kin and marital status)	• Assessing your needs for a suitable tenancy or home • To contact in case of an emergency
Financial information (including your income, welfare benefit entitlements and bank account details)	• To assess your financial status and needs in relation to your tenancy or service • Collecting payment for rent or other services • Working out a payment plan with you • Providing welfare, benefits and debt advice as a free service to help you budget, pay your bills, or to apply for funding on your behalf(with your consent)
Information about your previous housing circumstances	• Assessing your housing application • Preventing tenancy fraud, identity theft and illegal subletting (Aster uses various methods including the National Anti-Fraud Network (NAFN) to tackle and eradicate social housing fraud)

Online identifiers (including IP address or cookies) **Device identifiers (for example identifiers for a smartphone)**	• Improving our online services
Information about any additional guidance and support services you may need- for example, in connection with access to training and employment, we may hold information about your job history, skills and experience, or if we support you to improve your financial circumstances, we may hold information about your household income and expenditure	• To tailor your housing tenancy, according to your needs and signpost you to additional support that you may be interested in
Photographs, CCTV images, films and telephone recordings	• Identifying you (photo ID) • Recording our Contact Centre incoming and outbound calls for training and monitoring purposes so we can make sure we are delivering a good service* • Capturing your image on our surveillance systems if you visit an estate, office or community facility which is covered by this facility • Capturing images of the property condition (internally and externally)
Your contact history with us	We will record information whenever you contact us or use our services and we will note any action taken, for example logging repairs, and feedback from our contractors about appointments with you, so that we have a record of what happened and of our contact with you

**calls into and from our main Contact Centre are recorded and stored for 60 days. We do not record other calls made directly to you or from you unless we have your explicit consent to do so, or you have requested this for a specific purpose*

Special categories of personal data

We may also need to collect the following special category data about you. Given the services we provide, there are times when we may use it to understand our customers

and their needs better, such as providing accommodation for customers with disabilities, safeguarding or when dealing with neighbourhood disputes involving alleged criminal activity.

We will only collect and process this information where we have a lawful basis to do so under Article 9 of GDPR.

Special category types	We use it for
Country of birth, nationality, ethnicity, religion	• For equality monitoring purposes and where you have consented, to provide services tailored to your specific needs such as additional language needs
Sexual orientation	• For equality monitoring purposes
Health, disability, welfare and vulnerability data	• To ensure your home and your tenancy meets your specific needs including disabled adaptations. • Understand your care needs or caring responsibilities • Safeguarding concerns
Criminal offence data	• To assess your suitability for a tenancy or home • To manage the safety of you and other customers • To prevent crime and antisocial behaviour

Our 'My Aster' app
If you have a tenancy with us, we encourage you to use 'My Aster' which is an online service app enabling you to access your account and manage your personal details making sure they are up to date.

You have the option to inform us about your specific needs such as physical or mental health, ethnicity, language needs or other adjustments you would like us to know about in managing your tenancy with us. It is your choice whether you provide this to us, if you do, it will be used to tailor services to your needs.

You will also be able to manage your communication and marketing preferences here for general updates, newsletters and customer feedback surveys.

6 How we share your personal data

During the course of our business, we will restrict disclosure of personal data to only limited individuals or organisations *(i.e. relevant colleagues, suppliers or contractors, local authorities, statutory bodies, insurers, professional advisors, agents)* and we will

only disclose your personal data where we have a legitimate purpose for doing so or are required under a legal obligation.

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 do this through a Data Sharing Agreement with each contractor, agency or authority that we share data with. 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. For more information about our data sharing please contact dataprotection@aster.co.uk.

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 or share information with the police regarding crime and anti-social behaviour.

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

When we share data, we do so within the guidelines identified with UK data protection law. When data is shared with third parties such as local authorities, data is encrypted, and password protected or shared through secure portals.

We don't sell or provide your personal data to other organisations for their marketing purposes.

We will not share your personal data with anyone who claims to represent you unless we are satisfied that you have appointed them under our Permission to Share procedure or you have given them authority to act in some recognised official capacity on your behalf.

The list below sets out specific examples of where we may share your information, but this is not an exhaustive list:

Who we may share your data with	Why we need to share it
Property maintenance companies in a contract with us	In order to undertake repairs, maintenance, surveys, adaptations or improvement works
Local authorities	As necessary exercising statutory housing, social services or other public functions including statistical purposes
The emergency services – fire service, police, ambulance and NHS	In relation to the prevention or detection of crime and fraud; the apprehension or prosecution of offenders and the assessment or collection of tax or duty; as necessary

	for exercising statutory functions; to protect the vital interests of an individual ie. emergency evacuation plans
The Home Office, Department for Work and Pensions (DWP) and His Majesty's Revenue and Customs (HMRC), Department for Levelling Up Housing and Communities (DLUHC)	As necessary for administering justice, or for exercising statutory, governmental, or other public functions including statistical purposes
Utility providers	In connection with the setting up and supply of services, unpaid bills and fuel welfare scheme or fuel poor network connection schemes (e.g. gas, electricity, council tax and water)
Other housing providers and landlords	In connection with tenancy references and associated enquiries, mutual exchanges and management transfers
Credit reference agencies	In connection with some housing applications and in relation to any outstanding charges owed once residents leave their Aster home. You have the right to opt out by calling us on **0333 400 8222.**
Deposit Protection Scheme (DPS)	In relation to the deposit you paid (private market rent only)
Tenant/customer panels	To review our processes and the services we provide
Mutual exchange customers	It is a legal requirement that the incoming tenant has a copy of the original tenancy and deeds of assignment which means they can see the names of all previous tenants in the assignment chain
House builders or their contractors (if your property is a new build)	So that identified defects can be dealt with and the 12month defects inspections can be dealt with
Property management companies	In relation to any service charges the property may be subject to

Community partners such as Land Trusts	In connection with the delivery of coordinated local services
Members of parliament and councillors	In relation to local matters and complaints
The courts	In connection with legal proceedings
Housing Ombudsman	Regarding complaints handling
The Information Commission's Office	As the regulatory body for data protection
Other Regulatory Authorities including the Regulator for Social Housing, the Charities Commission and the Fundraising Regulator and Companies House , HSE	To comply with our regulatory obligations.
Specialist care provider organisations and charities	Where we have your consent to refer you to these services or work with them on your behalf
Medical professionals	Such as an occupational therapist to ensure you get the adaptation you need.
Interpretation services	Where you have additional language needs
Insurance services, solicitors and auditors	As part of our business obligations and legitimate interests
Other suppliers and contractors including IT providers	To provide corporate services to us including data processing services to us, or who otherwise process personal data for purposes that are described in this Privacy Notice.
Online and telephone survey providers	To assist us in gaining your feedback about our services to you

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 .

7 How long we keep your information for

We only hold personal data about you for as long as it is needed for the purpose(s) it was collected, or as required by law.

Some examples of our data retention periods include:

Housing tenancy customers	When you are no longer a tenant with us, provided there is no ongoing contact with you or outstanding arrears, we will retain your tenancy file for 6 years after which time it will be securely destroyed. Any individual or agency nominated on your account with a Permission to Share will be retained for up to 12 months from the end of your tenancy (provided there is no ongoing contact). If after 6 years, there is still ongoing contact with you or you are still in arrears, we will retain your tenancy file for 6 months after the last contact with you after which time it will be securely destroyed. As a registered housing provider, we will need to keep a minimal amount of information about your tenancy permanently, should you or we need to prove your tenancy at a future date, or you choose to re-apply for an Aster property. The information we retain permanently will be your: • Name • Date of birth • NI number • Address of the tenancy • Tenancy start date • Tenancy termination date • A copy of your tenancy agreement.
Housing tenancy applicants	If your application is successful, this will form part of your tenancy file and the above retention rules will apply.

	Unsuccessful tenancy applications will be retained for a period of six months from the date of application refusal.
Shared Ownership customers (including Sales)	Aster only holds records during the period of our relationship and for a set period afterwards to allow us to meet our legal obligations including resolving any follow up issues between us. Our standard retention period is 12 years after you have either purchased the remaining share or sold your property. We will securely destroy any information that we no longer need to use in relation to you and which we are not required to keep under other laws. In the case of live chat enquiries via our Aster sales website and messages received via our social media channels, all chats/messages initiated and data surrounding them will be deleted after 45 days. If you enquire about one of our shared ownership or open market homes for sale, the Aster sales team will retain your data for a period of six years, after which it will be securely destroyed unless you become a customer. You can withdraw your consent at any time by emailing homeownership@aster.co.uk or calling 01380 735480. Your data will be stored on secure local and online storage facilities.
House purchase outright (including Right to Buy & Sales)	Aster only holds records during the period of our relationship and for a set period afterwards to allow us to meet our legal obligations including resolving any follow up issues between us. For property sales Aster will hold your information for a maximum of 6 years after the sale has been completed unless you are receiving additional services from Aster. If you exercise the right to buy your property under Right to Buy or Right to Acquire legislation, we will securely destroy any information that we no longer need to use in relation to you and which we are not required to keep under other laws. Our standard retention period is 6 years.
Leasehold & Service Charges customers (including sewerage and water treatment)	Aster only holds records during the period of our relationship and for a set period afterwards to allow us to meet our legal obligations including resolving any follow up issues between us. For property owners with an Aster leasehold, we will hold your information for a maximum of 6 years after you have sold your property. We will securely destroy any information that we no longer need to use in relation to you and which we are not required to keep under other laws.
Garages customers	If you choose to end your Garage Licence Agreement with us, we will retain your data for 6 years after the end of your

	agreement. We will securely destroy any information that we no longer need to use in relation to you and which we are not required to keep under other laws.
Disabled adaptations to Aster homes	As you already have a tenancy with Aster we may add some of this information to your tenancy file and we may use it for other aspects of your tenancy where it can help us tailor services to meet your needs. We will securely destroy any information that we no longer need to use in relation to you and which we are not required to keep under other laws. Our standard retention period is 6 years, although for social housing tenants we will retain enough information to prove your length of tenancy status, should it be required.
Care & Support customers	See our Care & Support Privacy Notice.
Non-customers	6 months from the date of your last contact with us or closure of the enquiry/complaint.

8 Security of your personal data

We take the protection of your personal 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 employees, agents, contractors and other third parties who have a business need to know. 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 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.

To help us ensure that your personal data is kept confidential, we will ask you security questions to confirm your identity when you call us. We won't discuss your personal data with anyone other than you, unless you've given us prior written authorisation to do so by completing a Permission to Share Form either through your MyAster app or by calling us on **0333 400 8222**.

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 14 of our Privacy Notice.

9 Children’s personal data

We do not usually process data on children aged under 18 that live in our properties, as all of our main tenants are adults. However, we record children’s basic information if they are resident in one of our properties, including their name and date of birth. This is required for checking the property is not overcrowded and to assess other tenancy management issues where all householders and ages are required to be known.

We may also receive children’s information if we are involved in the housing and tenancy aspects of a welfare case as part of a multi-agency working solution and we may have a legal obligation to disclose this to statutory agencies such as police, NHS or social services on request.

10 Communication, marketing and our websites

We follow the Privacy and Electronic Communications Regulations (PECR) for any marketing carried out by email, phone, or text.

Direct communication

When you enter into a tenancy or service contract with us, we will use your contact details to keep you updated about your account, send you customer newsletters and

other information which is relevant to your contract with us. We may also update you and consult with you about,

- Proposed changes to our services or to this Privacy Notice,
- Asking you for feedback about the products and the services you have received from us.

We may use the information you have provided to contact you about other products or services Aster Group offers, that are similar to or may compliment your current service with us.

Direct marketing

We will only carry out direct marketing to you, when you have either given us consent or expressed an interest in our services or products.

However, with effect from 5 February 2026 under the Data (Use & Access) Act 2025 any registered charity within the Aster Group may use the marketing 'soft opt in' approach to promote our 'charitable purposes'. This applies where certain criteria are met, for example;

- You gave us your details to support or express an interest in our existing charitable purposes and/or activities including fundraising or volunteering
- We are sending you material regarding Enham's charitable activities or services similar to those you either support or have expressed an interest in (and not those of third parties)
- We have given you the opportunity to opt out of future communications.

Examples could be;

- Requesting donations of funds or other goods e.g. for our charity shop
- Requesting volunteers to help with charitable activities
- Providing information on Enham's charitable activities

Supporters who signed up before 5 Feb 2026 will be asked for consent for us to apply 'soft opt in'.

Supporters signing up after this date will automatically be registered for 'soft opt in' but may opt out at any time.

At the time of writing this applies to Enham Trust. Please visit their Privacy Notice for more information at https://www.enhamtrust.org.uk/privacy-policy.

Sharing data

We don't provide your personal data to other companies for their marketing purposes. However, we may aggregate anonymised information based on your personal data and

disclose this to third parties, for example, local and central government or our regulators for statistical purposes.

We may also contract third party survey providers (our Data Processors) to gain feedback from you about our services. In this case only your basic contact details will be provided and sharing will be controlled by way of a Data Processor Agreement.

Opting out of marketing, communications and surveys

You can opt out of our marketing communications or surveys at any time by

- Contacting us on 0333 400 8222
- Changing your preferences in your MyAster account if you have one
- Clicking the “unsubscribe” link in any of our emails.

Our websites - use of cookies

Please see our separate Cookie Policy

Links to other websites

Our website may contain links to other websites run by other organisations. This Privacy Notice applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies of other sites (even if you access them using links found on our site).

Promotional photographs, videos and articles

As part of our legitimate interests of promoting our services we may capture images either of individuals or at events. 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 retain these images for use for up to 6 years after which time they will be destroyed* unless we maintain it for archiving purposes.

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 be used for up to 6 years, after which it will be destroyed* unless we maintain it for archiving purposes.

**Please note that images in print or electronic publications previously distributed may continue to exist beyond this timeframe.*
We may also keep images of particular organisational, cultural or historical interest in our image archives for a longer period within an images ‘archive’.

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.

11 Social media

If you interact with us via one of our social media accounts, such as Facebook, LinkedIn, WhatsApp, Instagram, YouTube or any other online platform, we may collect information about you for the purpose of informing you about our services, engaging with you, and providing an initial response to your enquiries or comments.

Information we may collect

When you interact with us on social media, we may collect:

- Your social media username or handle,
- Your profile information, including your name and any other information you have made public on your profile,
- The content of your messages, comments, or interactions with our posts,
- Any other information you provide to us directly through private or direct messaging.

Purpose of collection

The information we collect through social media interactions is used to:

- Inform you about our services and updates,
- Engage with you and respond to your enquiries, comments, or feedback,
- Improve our services and understand public sentiment.

Data ownership and responsibility

Please be aware that any communication shared with us via social media platforms is not owned or controlled by Aster Group. These platforms have their own privacy policies and terms of service, and we cannot be held responsible for how these sites manage and process your data. We encourage you to review the privacy policies of the social media platforms you use to understand how they handle your personal data.

Direct messaging

While we strive to keep your communications with us private, it is important to note that direct messaging on social media platforms is still subject to the privacy controls and policies of the respective platform. We recommend that you avoid sharing sensitive personal data through social media direct messaging. Our standard practice is to engage with you directly rather than through these platforms.

12 NHS National Data Opt-Out

As a registered care provider with the Care Quality Commission (CQC), Aster Group is committed to protecting the privacy and confidentiality of our customers' and residents' medical information.

In accordance with UK legislation and NHS guidelines, we participate in the NHS National Data Opt-Out program. This program allows patients and residents to choose whether their confidential patient information is used for research and planning purposes. Confidential patient information:

- Identifies or might be used to identify an individual,
- Is obtained or created in a context leading to an obligation of confidence,
- Reveals something about health, treatment, or care.

Aster Group review all data processing activities annually to determine if the National Data Opt-Out applies. This is documented in our Record of Processing Activities (RoPAs). For any new processing activities, we assess if the National Data Opt-Out is applicable.

At this time, we do not share any data for planning or research purposes to which the National Data Opt-Out would apply. We review our use of confidential patient information annually to determine if it is used for research and planning purposes. If we begin such use, we will ensure individuals can exercise their right to opt-out.

13 Non-Customers

This section is for individuals who make an enquiry or complaint to Aster Group for any reason but are not a customer.

If you make a general enquiry to us, we will need to collect enough information to respond to your enquiry, such as your name, address, and contact telephone number. We will only use this information for the purpose of the enquiry you have made.

We will collect, process, and store personal data about you and your household members (when you provide information about household members, we assume that you do so with their full knowledge and consent) in order to deal with your enquiries. This includes queries about our services, complaints, our estates, boundary and access queries.

Lawful Basis under GDPR

The lawful bases for processing your personal data are:

Your legitimate interests as a Data Subject	In some cases, processing your personal data is necessary to protect your legitimate interests, such as when addressing your complaints or enquiries about

	property boundaries or access. The information we hold on our records concerns our relationship with you. For example, you will give us your name, address, and other contact details such as your telephone number when you contact us.
Our Legitimate interests as a Data Controller	We process your personal data to pursue our legitimate interests, which include: • Addressing and resolving enquiries and complaints, • Managing our estates and properties effectively, • Ensuring the security and safety of our operations, • Improving our services based on feedback and complaints received.
Compliance with a legal obligation	We may process your personal data to comply with our legal obligations, such as responding to regulatory requirements or providing information to law enforcement agencies when required.

Enquiries about land being sold or redeveloped

We have an ambitious programme of land and property regeneration to provide more affordable homes. As a neighbouring resident, you may have cause to speak to us, either by making an enquiry or if we need to contact local residents with updates.

We would not normally hold your information, but if you wish to contact us regarding the intended use of the land or planned works, we will need to collect and store your contact details. We may also need to pass these details onto our land and property development consultants or contractors so that they can liaise with you directly. If this is the case, we will always ask for your consent to do so.

Your contact details, including details of any correspondence with us, may be retained as part of the relevant regeneration project file. We will retain this information for as long as necessary, after which it will be made anonymous or securely destroyed.

General enquiries relating to land or property

You, or an agent acting on your behalf (for example, a solicitor), may contact us regarding land and property issues, including (but not limited to) ownership enquiries, restrictive covenants, boundary and party wall issues, rights of access, and land sales.

If you are not a customer or tenant of Aster Group, we would not normally hold your information, but if you contact us regarding land or property, we will need to collect and store your contact details on our systems to address your query. Your contact details, including details of any correspondence with us, may be retained as part of the relevant property file. We will retain this information for as long as necessary, after which it will be made anonymous or securely destroyed.

Party wall notices

This may occur if your privately owned property adjoins a property owned by Aster Group and we need to serve notice on you to carry out works affecting the party wall (or vice versa).

If you are not a customer or tenant of Aster Group, we would not normally hold your information, but if you contact us regarding the notice or intended works, we will need to collect and store your contact details on our systems to address your query. Your contact details, including details of any correspondence with us, may be retained as part of the relevant property file. We will retain this information for as long as necessary, after which it will be made anonymous or securely destroyed.

14 Your individual rights under UK 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 persona data we hold that relates to you. This will not include information that relates to your property such as repair logs, surveyor reports or details of contractor visits, as this is not considered personal data. You can request this directly from our property teams.
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.
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 tenancy or 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. At the current time we do not carry out any automated decision making. In line with the Data Use & Access Act 2025, any automated decision making will always have appropriate safeguards such as a documented data lifecycle (to log how data informs decision making) and meaningful human review (to enable decisions to be sense checked or reviewed) 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/

15 Making a complaint

Making a complaint about our services

Aster Group is subject to the statutory requirements of the Complaint Handling Code 2024, regulated by the Housing Ombudsman. More information can be found at www.housing-ombudsman.org.uk.

When we receive a complaint from you or a representative acting on your behalf, we create a file containing the details of the complaint. This normally includes the identity of the complainant, and any other individuals involved in the complaint. We will only use the personal data we collect to process the complaint and to check on the level of service we provide.

Where required we will share your tenancy file with the Housing Ombudsman.

We will keep personal data contained in complaint files in line with our customer file retention policy meaning your complaint will be held in line with your tenancy or service with us. We may use it to inform and improve future service delivery aspects of your tenancy or service.

If you are not an Aster customer information relating to a complaint will be retained for one year from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

We may compile and publish statistics showing information like the number of complaints we receive, but not in a form that identifies anyone.

Similarly, where enquiries are submitted to us, we will only use the information supplied to deal with the enquiry and any subsequent issues, and to check on the level of service we provide.

Complaints relating to service delivery should be directed to complaintsteam@aster.co.uk

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/

16 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

17 Changes to our Privacy Notice

We may update this Privacy Notice and our subsidiary notices 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

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