Privacy Notice

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**	4
4	**Our lawful basis for processing personal data**	5
	Legitimate interests	
	Special category personal data	
5	**Types of personal data we collect**	7
6	**How we share your personal data**	8
	International data transfers	
7	**How long we keep your personal data for**	10
8	**Security of your personal data**	11
9	**Children's personal data**	12
10	**Communication, marketing and our websites**	12
	Direct communication and marketing	
	Sharing data	
	Opting out of marketing	
	Our websites and use of cookies	
11	**Social media**	14
12	**Your individual rights under data protection law**	15
13	**Making a complaint**	18
	Making a complaint about our services	
	Making a complaint about data protection and the use of your data	
14	**Contacting us**	19
15	**Changes to our Privacy Notice**	19

1 Introduction

This is the Privacy Notice for Enham Trust which is a subsidiary of the Aster Group.

The purpose of this Privacy Notice is to give you a clear explanation about how Enham Trust uses the personal data we collect from you or about you. It provides you with the necessary information regarding your rights and our obligations, and explains how, why, and when we process your personal data.

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:

- Our Direct Payment and support services,
- Our Supported Employment programme,
- Social Enterprises - 3PL, gardening and charity retail,
- Our activity programmes and transport services,
- Our fundraising activities.

Enham Trust is also a registered provider of social housing, specialising in providing affordable living accommodation for disabled and disadvantaged people. As these services are provided in partnership with other subsidiaries within the Aster Group, these are covered under separate Privacy Notices which are referenced below;

- Enham Trust Supported Housing Customers
- Enham Trust Residential Care and Care at Home customers

In using our above listed services and our website, 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.

Who we are

Enham Trust is a registered charity No. 211235 and a company limited by guarantee registered in England and Wales No. 173199. Our registered address is located at Enham Place, Enham Alamein, Andover, Hampshire, SP11 6JS.

We are a registered provider of social housing, specialising in providing affordable living accommodation for disabled and disadvantaged people ranging from general needs tenancies, specialist, and supported accommodation as well as private market rented homes.

Enham Trust supports disabled people to live, work and enjoy life as independently as possible through a range of services.

We provide homes and person-centred care and support so individuals can live the life they choose, supported access to work, skills development, and confidence building and a range of accessible opportunities that support individuals' mental and physical wellbeing enabling them to enjoy life.

ICO registration and Data Protection Officer

Enham Trust is registered with the Information Commission's Office (ICO) as a Data Controller under reference **Z5492486** and is a subsidiary of the Aster Group of companies.

We may, as part of the Aster Group process your personal data across different subsidiaries within the Group in the course of delivering a service to you, for example housing, care and support, centralised financial and fundraising services or linking different services received by you together for a better customer experience.

Each subsidiary within Aster Group is registered with the ICO as a Data Controller and your data will only be shared across the Group where we have a lawful basis for doing so. These are registered with the ICO as below:

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

Our Group Data Protection Officer (DPO) is Nicola Miller, Head of Risk and Compliance.

To contact us regarding our use of your personal data, you may email us at dataprotection@aster.co.uk or telephone **0333 400 8222**.

2 Who we collect personal data about

This Privacy Notice applies specifically to people who access services provided by Enham Trust, detailed in section 1. We collect and process personal data about individuals in order to provide care, support and related services.

We collect and hold personal data about:

- People who receive support or services from Enham Trust,
- People who are applying to receive support from Enham Trust,
- Next of kin, relatives, carers or legal representatives of those receiving services,
- Individuals who act as emergency contacts or advocates,
- Individuals involved in safeguarding or complaints processes,
- Representatives of partner agencies, local authorities, or care professionals involved in an individual's support,
- People participating in Enham projects, events, or programmes,
- People who have donated to or fundraised for Enham Trust or who have signed up to become supporters or volunteers.

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 services, complete one of our forms, when you write, email or meet with us, or respond to a survey
- 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 make a donation to us including Gift Aid, or leave us a legacy donation in your Will
- When you carry out or are involved in fundraising activities for us
- When you sign up to become an Enham supporter
- When you sign up to volunteer with us
- When you make payments to us for services received
- 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 one of our sites, schemes or offices, we may also have Closed Circuit Television (CCTV) surveillance cameras to record events in public areas
- When you communicate with us on social media or post comments 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)
- 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.

Service area	Purpose of processing	Lawful bases that we use under Article 6 UK GDPR
Direct Payment and support services	To assess eligibility, manage care packages , support budgeting and payments and managed payroll services	6(1)(b) – Performance of a contract 6(1)(c) – Legal obligation
Supported Employment and Social Enterprises	To provide employment advice, and support, training, job matching and workplace support	6(1)(b) – Performance of a contract 6(1)(f) – Legitimate interests (service development, employer engagement)
Activity programmes and transport services	To coordinate activity schedules, and volunteer opportunities, including radio support, ensure accessibility and safety, manage bookings, placements and transport arrangements	6(1)(b) – Performance of a contract 6(1)(d) – Vital interests (in case of emergency) 6(1)(f) – Legitimate interests
Fundraising activities	To process any donations, Gift aid or other support that you have given us To keep in touch with you about campaigns, events, case studies and donations and Gift Aid, to research new fundraising opportunities To conduct due diligence around fraud or money laundering	6(1)(a) – Consent (you can withdraw consent at any time) 6(1)(b) – Performance of a contract 6(1)(c) - Compliance with a legal obligation 6(1)(f) – Legitimate interests (where lawful to do so without consent)

	To manage and co-ordinate volunteering opportunities related to fundraising	

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:

Service area	Purpose of processing	Conditions under Article 9 UK GDPR
Direct Payment and support services	To assess eligibility for support, manage care plans, and ensure appropriate services based on disability or health condition	9(2)(h) – Provision of health or social care 9(2)(b) – Employment and social protection law
Supported employment and Social Enterprises	To tailor employment support based on health conditions, disabilities, or support needs; to identify and put in place reasonable adjustments When sharing case studies, testimonials, or stories involving individuals' health or background, only with your clear consent	9(2)(b) – Employment and social protection law 9(2)(h) – Health/social care for workplace support 9(2)(a) – Explicit consent
Activity programmes and transport services	To ensure safety and accessibility during travel or activities including volunteering; to monitor diversity and promote inclusion. When sharing case studies, testimonials, or stories involving individuals' health or background, only with your clear consent	9(2)(h) – Provision of Health or social care 9(2)(a) – Explicit consent
Fundraising activities	To ensure safety and accessibility during activities including volunteering. When sharing case studies, testimonials, or stories involving individuals' health or background, only with your clear consent	9(2)(a) – Explicit consent 9(2)(g) – Substantial public interest (charitable aims, inclusion)

	For gaining more information on the demographics of our donators to tailor our communications or fundraising services (data will be anonymised) For ethical screening, to reduce the risk of Enham being associated with a person, group or entity that does not align with our values or reputation	

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 and service users mentioned above in section 2 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 housing tenancy customers please see the Aster Group Housing Customer Privacy Notice.

For care and supported housing customers, please see the Aster Group Care and Support Privacy Notice.

We may collect the following personal data about you:

- **Identity Information** – Full name, title, date of birth, gender, NI number, next of kin or emergency contact details,
- **Contact Information** – Home address, email address, telephone numbers,
- **Financial Information** – Bank details, payment card information, funding details (e.g. bursaries, grants, direct payments), benefits that you may be in receipt of, information relating to Gift Aid or Wills,
- **Communication Preferences** – Your preferences for how we contact you and the content you'd like to receive,
- **Activity and Transport Data** – Attendance records, booking information, transport needs and usage,
- **Photographic or Video Images** – Where consent has been given (e.g. for case studies, marketing, webinars),
- **Qualifications and skills** – for our supported employment programmes,

- Any information to assist, relevant investigation and complaint activity, incidents, accidents or safeguarding,
- **Professional information** – to identify potential high value donors (from publicly available sources such as LinkedIn, Charity Commission, Companies House, social media or internet searches).

Special category personal data

Within Enham's activities we primarily collect and process the following special category personal data under GDPR Article 9(2):

- Your physical or mental health needs,
- Any disabilities and or vulnerabilities you tell us about,
- Your ethnicity (for diversity monitoring),
- Your sexual orientation (for diversity monitoring).

For donators, we may in certain circumstances collect data relating to political or ideological beliefs where this is publicly available to reduce our risks of being associated with a person, group or entity that does not align with our values or could harm our reputation.

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.

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
Other entities within the Aster Group	Where we have your consent to do so or where that entity is conducting activities on Enham's behalf as a Data Processor, e.g fundraising administration

Local authorities	For the processing/management/support of your Direct Payment or Personal Health Budget in line with your DP agreement.
Social services, NHS, GP	In relation to any health needs you have told us about that we need to consider.
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
His Majesty's Revenue and Customs (HMRC)	Administering managed accounts / payroll information on your behalf
DWP and Access to Work providers	For administering your Supported Employment funding to enable you to be supported in your workplace or reasonable adjustments to be put in place. For Access to Work funding and assessments.
Members of parliament and councillors	In relation to local matters and complaints
The courts	In connection with legal proceedings
The Information Commission's Office	Regulatory body for Data Protection
Other Regulatory Authorities including the Regulator for Social Housing, the Charities Commission and the Fundraising Regulator, 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
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, mailing services	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.
Funders, councils, press and media	For our marketing purposes
Our volunteering platform provider	To enable you to register your interest in volunteering opportunities and to enable us to tell you about / offer you volunteering opportunities.

International data transfers

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 personal data 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 retention periods include:

Area	Type of data	Retention Period	Purpose
Direct Payment and support services	Financial records and payment history	6 years	UK Financial regulations
Supported Employment and Social Enterprises	Employment and skills contracts	7 years after contract ends / final DWP payment	Social Protection employment law
Safeguarding	Safeguarding records	Up to 75 years	UK safeguarding guidance
Fundraising activities	GiftAid declarations	6 years	HMRC requirement for audit / tax purposes
	Marketing mailing lists	1 year	PECR good practice
Volunteering	Your contact details and volunteering interests	Deleted when you close your volunteering account (or 2 years of inactivity	Purpose limitation GDPR

We will retain data only for as long as is necessary to process in line with the original purpose and to fulfil our regulatory and legal obligations. After that point Enham Trust will consider if there are other legitimate reasons, we may need to retain data for a defined period. If there is no reason for Enham Trust to retain the data, it will be confidentially destroyed in line with our retention schedules.

By law we have to keep basic information about our customers (including contact details, identity, service needs and requirements) in line with our contractual and legal requirements.

Please contact us if you wish to obtain a copy of our Group Retention Schedule.

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.

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 12 of our Privacy Notice.

9 Children's personal data

We do not usually process data on people aged under 18 (with the exception of our Supported Employment programme which is open to 16+).

Children under 18 years of age can fundraise or volunteer with the consent and support of a parent or guardian, we do not hold contact information for under 16s. Instead, their parent or guardian's details are retained (with their contact preferences).

We may also capture photos of children, when taking photos of our community events, this will be in group or larger scene photos only.

In rare cases, we may receive or process children's information if we are involved in a safeguarding concern. Where we believe a child is at risk of harm, we have a legal obligation to share relevant information with statutory agencies such as the police, NHS, or social services. This is done in line with safeguarding laws and our internal safeguarding policies, and always with the best interests of the child as the priority.

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.

With effect from 5 February 2026 under the Data (Use & Access) Act 2025 as a registered charity we 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.

Sharing data

We don't provide your personal data to other companies for their marketing purposes, unless we have your consent. 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.

Opting out of marketing and communications

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

- Contacting us on 01264 345800
- Changing your preferences by emailing marketing@enhamtrust.org.uk
- Clicking the "unsubscribe" link in any of our emails.

Should you not wish Enham Trust to contact you in the future, we will hold your contact details on file. This will enable us to ensure that we comply to your wishes.

We will hold this data indefinitely. Should you wish to engage with Enham Trust again then please email fundraising@enhamtrust.org.uk.

Enham Trust is registered with the Fundraising Preference Service via the Fundraising Regulator. This is a free service that can help you or someone you know to end contact with charities that you no longer want to hear from and that enables you to manage direct marketing communications from registered charities in England, Wales and Northern Ireland that are sent by addressed mail, emails, text messages or phone calls.

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 on the Enham Trust or 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 taken, we will process these when we have obtained your permission using the GDPR lawful basis of 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 store and use 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 single image at any time. In this case we will make every effort to remove images of you from our central database, preventing future use. Please note however that if images have already been published in paper or other formats we are unable to remove these from circulation.

Please contact us if you wish to exercise this right at via marketing@enhamtrust.org.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 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 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 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. 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/

13 Making a complaint

Making a complaint about Enham's services

If you have a complaint specifically regarding the services covered in section 1 of this Privacy Notice, this can be made directly to our Enham Trust complaints team at complaintsteam@enhamtrust.org.uk.

Complaints can also be made to the appropriate regulator such as the Charity Commission at www.gov.uk/government/organisations/charity-commission or the Fundraising Regulator at https://www.fundraisingregulator.org.uk/.

Making a complaint about our housing services

Enham Trust is subject to the statutory requirements of the Complaint Handling Code 2024, regulated by the Housing Ombudsman. If you have a tenancy with us, more information can be found at www.housing-ombudsman.org.uk.

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 Enham Trust or Aster Group 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.

Complaints relating to delivery of our housing services should be directed to complaintsteam@aster.co.uk.

Making a complaint about our Care and Support service

If you have a complaint specifically regarding a care service, this can be made directly to our complaints team complaintsteam@aster.co.uk or the regulator Care Quality Commission (CQC) at www.cqc.org.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. 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/

14 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

15 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