ASTER GROUP

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

Privacy Notice
Care and Supported Living

Contents

		Page
1	Introduction	2
	Who we are	
	ICO registration and Data Protection Officer	
	How we manage your personal data	
	Our legal obligations	
2	Who we collect personal data about	6
3	How we collect your personal data	6
4	Our lawful basis for processing personal data	7
	Legitimate interests	
	Special category personal data	
5	Types of personal data we collect	9
6	How we share your personal data	13
	International data transfers	
7	How long we keep your personal data for	15
8	Security of your personal data	16
9	Communication, marketing and our websites	17
	Direct communication & marketing	
	Sharing data	
	Opting out of marketing	
	Our websites and use of cookies	
10	Social media	18
11	NHS National Data Opt-Out	19
12	London Care Records	20
13	Your individual rights under data protection law	21
14	Making a complaint	24
	Making a complaint about our care and support services	
	Making a complaint about our housing services	
	Making a complaint about data protection and the use of your data	
15	Contacting us	25
16	Changes to our Privacy Notice	25

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

The purpose of this Privacy Notice is to give you a clear explanation about how Aster Group Limited and its subsidiaries use personal data we collect from you or about you.

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.

This is the main Privacy Notice for:

- Residents living in our Care Homes receiving full time care services from us, and
- Customers living in our Supported Living Schemes* who may also receive other forms of support provided by us or our partners.

**If you are supported living customer, to understand how we manage your personal data in regards to your housing tenancy please refer to the main Aster Group Privacy Notice. Refer to this Privacy Notice on how we manage your personal data in regard to your supported living services.*

It applies to information about:

- Residents or people in community services who receive our care and support,
- Applicants and people referred to our one of the services from subsidiaries within the Group,
- Third Party individuals – individuals whose details our residents or customers provide to contact Aster on their behalf i.e. next of kin,
- Appointees – a person or organisation appointed to manage the benefits of someone who is unable to do themselves due to mental incapacity or severe physical disabilities,
- Advocates – an individual who supports and represents individual who may have difficulty expressing their needs, wishes or concerns,
- Visitors to our schemes, sites, offices and websites.

In using 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 refers to the 'parent company' of a collection of entities that provide affordable housing, care and support thousands of people across the south of England and London.

Our care and supported living services are primarily provided by the below subsidiaries of Aster Group Limited:

- **Central and Cecil Housing Trust** registered office Grace House, 26 Lodge Road, London NW8 7ER
- **Enham Trust** registered office Enham Place, Enham Alamein, Andover, Hampshire SP11 6JS
- **East Boro Housing Trust** registered office Faulkner House, 31 West Street, Wimborne, Dorset BH21 1JS

The above subsidiaries are registered with the Care Quality Commission (CQC) as health and social care providers

Herein this Privacy Notice will refer collectively to all subsidiaries collectively as 'Aster Group', 'we' or 'us', as care and support services may delivered by different parts of the parent group.

ICO registration and Data Protection Officer

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.

- Central and Cecil Housing Trust Z7452516
- Enham Trust Z5492486
- East Boro Housing Trust Z7403861

We 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. These are registered with the ICO as below;

- Aster Group Z9842654
- Aster Communities Z2964186
- Aster Property Z9436053
- Aster Living Z9435976
- Aster Homes Z2708504
- Aster Foundation ZB328170

- Aster 3 ZA273995
- Synergy Housing Z2945053

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

We need to collect, process and store personal data about you, and your advocate or next of kin where you provide that information, to be able to deliver efficient and effective care and support services.

We collect information about you in a variety of ways, including:

- When you apply for care and/or supported living services with us,
- When you're referred to us by a commissioning body such as Local Authority, NHS or Integrated Care Board,
- From commissioning bodies as part of ongoing support,
- When you sign a support agreement,
- Through ongoing contact with Care and Supported Living teams,
- Recording from calls that are made from or to us.

When you apply for support, we can ask for and consider any references / information necessary to assess your application. This may include, but is not limited to, information from other landlords, care providers, support services, Social Services and health services.

We also collect information when you voluntarily complete customer surveys, provide feedback, and participate in competitions.

Our website does not capture or store personal data but does log the user's IP address and cookies to record the number of visitors to our website.

Our legal obligations

The subsidiaries above, as part of the Aster Group are subject to a number of laws relating to care & support that affect our personal data processing. We have provided a list of the main laws that affect our personal data processing in relation to care and support below as well as detailing which category of individual it relates to.

United Kingdom (UK) Law	Personal data implications	Who it relates to
Care Act 2014	This affects care assessments, support plans, personal care advocacy. This also adds a duty to protect people at risk and engage in safeguarding.	Individuals receiving or seeking care
Care Quality Commission Regulation 2009	Independent regulator of health and social care ensuring health and social care services provide people with safe, effective, compassionate, high-quality care.	Customers receiving care
Equalities Act 2010	Conducting Equality Impact Assessments, records of equality training.	Customers and employees
Health and Social Care Act Regulations 2014	This relates to ensuring care services provided are safe, effective and of high quality in line with the regulation.	Customers receiving care or supported living services
Housing Act 2004	This includes provisions to assessing and removing health risks. For example, we may need to collate records of fire hazards left by customers in areas that are meant to be left clear. Deposit protection scheme for private rent tenants.	Customers receiving care or supported living services
Medicine Act 1968	This relates to regulating control of medicines to ensure safety, quality and efficacy lawfully.	Customers and employees
Mental Capacity Act 2005	This relates to individuals who do not have the mental capacity to make some or all their own decisions. Aster Group will need to keep record of these individuals, their needs and who is authorised to make decisions on their behalf.	Customers receiving care
Mental Health Act 1983	This includes numerous provisions such as giving others powers to make decisions for you, to enabling you to treated for your mental health needs in the community.	Customers and employees

Misuse of Drugs Act 1971	This relates to the control of dangerous or otherwise harmful drugs lawfully.	Customers and employees
Prevention of Social Housing Fraud Act 2013	This relates to the prevention of social housing fraud and requires information to be processed to this effect. This means that Aster Group will need to keep records of the various individuals with authority to act on your behalf as well as the associated medical records.	Customers in supported living schemes
Social Housing (Regulation) Act 2023	Relates to consumer standards including health & safety, complaint handling and tenant access to information as well as a competency standard for housing officers	Customers and employees

2 Who we collect personal data about

We collect and hold personal data about:

- Residents or people in community services who receive our care and supported living services,
- Applicants and people referred to our one of the services from other subsidiaries within the Group,
- Third Party individuals – individuals whose details our residents or customers provide to contact Aster on their behalf i.e. next of kin,
- Appointees – a person or organisation appointed to manage the benefits of someone who is unable to do themselves due to mental incapacity or severe physical disabilities,
- Advocates – an individual who supports and represents individual who may have difficulty expressing their needs, wishes or concerns,
- Visitors to our websites, sites and offices.

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 homes or 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 i.e. National Health Service (NHS) which relate to you,
- Contact from people associated with you such as family, friends and neighbours who you have given authorisation for us to speak to,
- 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, care services or offices, we may also have Closed Circuit Television (CCTV) surveillance cameras to record activity 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, social services, family members, neighbours, members of the public, employers, and other agencies such as DWP, courts, police.

Note: if you provide us with personal data relating to members of your family or your representatives, 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	• Managing application to provide residential care services • Managing applications, providing supported living housing • Providing supported living and care services • Personal data involved name, contact details, payment details and case notes
Processing is necessary for compliance with a legal	• To comply with legal obligations such as safeguarding, fraud prevention and reporting to regulators such as the CQC

obligation to which the data controller (Aster Group) is subject	• Providing mandatory disclosures to authorities i.e. local authorities, NHS, police
Processing is necessary for the legitimate interests of either the data controller or the individual	• To improve our services and protect the safety of our customers and staff • Monitoring service quality • Conducting surveys • Ensuring safety through CCTV
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 carry 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 and the NHS in their statutory obligations • Developing care and support plans • Liaising with healthcare providers
Where there is a substantial public interest with a basis defined by the Data Protection Act 2018	• Protecting the public, preventing unlawful acts • Reporting to statutory bodies such as the Care Quality Commission
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.

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.

When you apply to become a care resident or supported living housing customer in one of our schemes, we will need to obtain information to determine your needs.

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 • 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 residential care applications • Processing supported living housing tenancy applications
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 care home placement • Liaising with your family and loved ones in line with expressed wishes of people supported. For friends and family meetings as appropriate and for best interest decisions as necessary • 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 care service • Collecting payment for rent or care & support 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 supported housing or care service 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 care placement or supported 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 use or visit a scheme, community facility, office or estate to ensure the safety of residents and visitors • Capturing images of the property condition (internally and externally) to ensure the safety and wellbeing of residents and visitors
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 disabled customers, safeguarding, effective and person centre care and support services 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 and recording the care provided to you in care and support plans • Addressing any safeguarding concerns
Criminal offence data	• To assess your suitability for a supported living tenancy or residential care • 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.

6 How we share your personal data

During the course of delivering our services to you, 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)* 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 local authority, contractor or support agency 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 are required to share information with your local GP or NHS health provider regarding your care plan, healthcare needs or treatment or provide information about housing benefits to your local authority or relevant central government department.

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 either:

- Our Permission to Share procedure,
- Our care services consent processes,
- You have given them authority to act in some recognised official capacity on your behalf such as a Lasting Power of Attorney,
- They have been appointed under a court of protection order.

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

Local authorities	As necessary exercising statutory housing, adult and social services or other public functions including statistical purposes
Your GP or NHS healthcare provider	In delivering a co-ordinated health and care service to you
Medical professionals	Such as an occupational therapist to ensure you get the care or adaptations you need.
The emergency services – fire service, police, ambulance and NHS	In relation as necessary for exercising health and social care statutory functions; to protect the vital interests of an individual ie. emergency evacuation plans, safeguarding, health, care and support services and for the purposes of delivering your care and support from us
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.
Property maintenance companies in a contract with us	In order to undertake repairs, maintenance, surveys, adaptations or improvement works
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).
Tenant/customer panels	To review our processes and the services we provide
Property Management companies	In relation to any service charges the property may be subject to
Members of parliament and councillors	In relation to local matters and complaints
The courts	In connection with legal proceedings
Housing Ombudsman	Regarding complaints handling

Care Quality Commission	As the regulatory body of registered care services
The Information Commission's Office	As the regulatory body for data Protection
Specialist care provider partner 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

Please visit our main Group Privacy Notice for a full list of who the wider Group may share data within relation to general housing or corporate / business services at www.aster.co.uk/privacy

International data transfers

At the current time Aster Group 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 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.

When you no longer receive supported living or care services, we will retain your file for 7 years from the closure of the service or date of death. Your file includes but not limited to, your person-centred care and support plans, risk assessments, medical information sheet, service contract, MAR chart, nutritional care needs and communication assessments. Other examples include, photography consent will be retained for 3 years from the date of permission. For incident and accident reports will be retained for 10 years and mental health care records (where person is being cared

for under the Mental Health Act) will be retained for 25 years after discharge or date of death.

For non-customers/residents we will retain your information for 6 months from your last contact with us or closure of the enquiry/complaint.

*If you have a tenancy with us, visit our main privacy notice here (www.aster.co.uk/privacy) for housing retention information.

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 employees 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 13 of our Privacy Notice.

9 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.

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.

Opting out of marketing

You can opt out of our marketing communications 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 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 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.

10 Social media

If you interact with us via one of our corporate 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.

11 NHS National Opt-Out

As a registered care providers with the Care Quality Commission (CQC), the Aster Group subsidiaries mentioned above are 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 programme. This programme allows patients, residents and people who use our services 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.

We 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.

12 London Care Record

Applies to Central & Cecil Housing Trust only

The health and care professionals who look after you keep their own records in different specialist systems that contain details of any treatment or care you have received or are receiving from them in each different organisation where you are receiving care. These records may be electronic, on paper or a mixture of both, and a combination of working practices and technology ensure your information is kept confidential and secure.

The London Care Record provides health and care professionals with a secure "electronic summary view" of the information that organisations want to share about you. This provides the people looking after you with important information from other services that you use, so that they can quickly assess you and make the best decision or plans about your care.

The information which health and care organisations can share about you might include the following information:

- Details about you, such as address, contact details and next of kin,
- Any contact the health or care provider has had with you, such as appointments, clinic visits, emergency appointments, etc,
- Notes/reports and assessments about your health and care, including from some specialist services such as the Royal Marsden and Moorfield's Eye Hospital,
- Details about your planned treatment and care,
- Results of investigations, such as blood tests, scans, x-rays, etc,
- Relevant information from other health and care professionals, relatives or those who care for you,

- Care and support you may be receiving from Social Care services,
- Urgent care and NHS 111 visits/calls and London Ambulance Service calls.

Purpose for sharing data: Information will be shared to support your “direct care”.

> “Direct patient care” is defined as “a clinical, social or public health activity concerned with the prevention, investigation and treatment of illness and the alleviation of suffering of individuals. It includes supporting individuals' ability to function and improve their participation in life and society. It includes the assurance of safe and high-quality care and treatment through local audit, the management of untoward or adverse incidents, person satisfaction. You can find out more information about the London Care Record here, information about the organisations that are part of the London Care Record here and answers to some Frequently Asked Questions here.

13 Your individual rights under UK data protection law

You have the following rights including:

Right of access	Under the 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 information 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. If we do not hear from you within one month, we will close your request.

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/

14 Making a complaint

Making a complaint about our care and support services

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 our housing services

Aster Group 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.

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.

Complaints relating to delivery of our housing services 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/

15 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

16 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 Sept 2026	Current version