

Housing Partners Ltd

Data Processing Annex

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1. Nature and purpose of the Processing

HPL processes the Personal Data in order to provide the Services to the Customer. Thereafter, HPL processes the Personal Data to store in line with HPL back up policy. Recover in the event of data loss in line with HPL disaster recovery process.

2. Duration of Processing

HPL processes the Personal Data for as long as the Contract is in place with the Customer and as determined by clause 14.4 of the Terms. Thereafter, HPL processes the Personal Data in accordance with data retention policy.

Data relating to subscribing landlords and tenants' PII is retained by default for 7 years from the date of HPL processing data, however customers can specify an alternative retention period. After this date HPL may delete or anonymise this data for statistical purposes.

Types of Personal Data

HPL processes the following types of personal data:

- Name
- Address
- Financial history
- Health information
- Officer notes
- Household information e.g. names & DOB's
- Tenancy details
- Date of birth
- Contact details
- Payment plans
- Benefit payments
- Health information
- Behavioural information
- National insurance number
- Next of kin contact details or contact details of other people e.g. support worker
- Sensitive information e.g. domestic abuse
- Equality information e.g. ethnicity, language

3. Categories of Data Subjects

- Tenants
- Support workers
- Customer staff with AIM user accounts
- Household members
- Next of Kin

4. Sub-Processors

<u>Sub-Processor</u>	<u>Data Shared</u>	<u>Purpose of Data Sharing</u>
Microsoft Azure	Full dataset	The data is securely hosted within the EEA on the Azure cloud, as such, this data is not 'shared with Microsoft Azure' as it is protected and only visible to us.
Salesforce	Landlord usernames, contact details, tenant user details	Help desk/customer service software solution. Hosted in the EU.
SendGrid	Email address and message contents.	SendGrid provides an email solution to facilitate password reset functionality Data is hosted within the USA. SendGrid participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework.
Solvous Marketing Limited	Customer contact details	Solvous Marketing Limited distribute Housing Partners' product related material such as newsletters, product updates, features and enhancements. Solvous do not market non-Housing Partners products to customers and do not pass customer contact details on to any other parties. No data is stored by Solvovs on their infrastructure.
Mailchimp	Name and email address and email contents	MailChimp provides a bulk email marketing solution. Data is hosed within the USA. MailChimp participates in and has certified its compliance with the EU-U.S.

		<p>Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework.</p> <p>MailChimp complies with the Privacy Shield Principles for all onward transfers of Personal Information from the EEA, United Kingdom, and Switzerland.</p>
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