

Housing Partners Ltd

Data Processing Annex

Data Processing Annex - SwapTracker

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 tenants is retained for the length of the tenancy. After this date HPL may delete or anonymise this data for statistical purposes.

3. Types of Personal Data

HPL processes the following types of personal data:

- Tenant names
- Address
- Sex
- Date of Birth
- National Insurance number
- Household details (as above)
- Contact information
- Property Information including tenancy type
- Financial Information
- Bank statements
- Universal Credit/Housing Benefit ESA or payment slips
- Photo ID such as Driving Licence or Passport
- Anti-social behaviour / criminal record
- Medical conditions

4. Categories of Data Subjects

- Incoming tenant and family members
- Outgoing tenant and family members
- Landlord

5. Sub-Processors

Microsoft Azure	Full dataset	The data is securely hosted on the Azure cloud, as such, this data is not 'shared with Microsoft Azure' as it is protected and as such only visible to us.
SendGrid	Email address and message contents.	SendGrid provides a tenant and landlord messaging solution. 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 Solvovus 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. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework. MailChimp complies with the Privacy Shield Principles for all onward transfers of Personal Information from the EEA, United Kingdom, and Switzerland.
Salesforce	Landlord name and contact details	Help desk/customer service software solution. Hosted in the EU.

