**Allerdale Rent With Confidence – Privacy Notice**

This Privacy Policy provides details of the personal data we (**Allerdale Borough Council**) collect from you, what we do with it, how you might access it and who it might be shared with.

Allerdale Borough Council is the controller and responsible for your personal data (collectively referred to as Allerdale Borough Council, "we", "us" or in this privacy policy).

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

**1.0 Our beliefs regarding privacy and data protection**

* We have a duty of care to all persons with data held in our system;
* Data is a liability, and so we only collect/process it when absolutely necessary;
* We will never sell your personal information;
* Your data belongs to you, and you are at liberty to request access to it whenever you want to;
* You, as the Data Subject, have the right to withdraw your consent at any time.
1. **Contact details**

The Council’s Data Protection Officer can be contacted by email at: foi@allerdale.gov.uk

If you remain dissatisfied with our service and how we have handled your complaint or request to exercise your privacy rights, then you can go to the Information Commissioner's Office at:

The Information Commissioner

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Phone: 08456 30 60 60 or their [website](https://ico.org.uk/).

For all other enquiries please contact:
Allerdale Rent With Confidence
Allerdale Borough Council
Allerdale House
Workington
Cumbria
CA14 3YL

1. **Third Party Links**

This website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

**4.0 What data we collect**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data when the identity has been removed (anonymous data).

We may collect, use, store and transfer the following personal information:

* **Identity Data**: includes first name, last name and user name;
* **Contact Data:** includes email address and telephone numbers;
* **Technical Data:** includes internet protocols (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website;
* **Profile Data:** includes your user name and password, your preferences and reviews;
* **Usage Data:** includes information about how you use our website.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, student union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

**5.0 How and why we collect your Personal information**

We use different methods to collect data from and about you, including through:

* **Direction interactions.** You may give us Identity and Contact Data when creating an account or by corresponding with us by post, phone, email or otherwise;
* **Automated technologies or interactions**. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our [cookie policy](https://www.allerdalerentwithconfidence.org.uk/Cookies) for further details;
* **Third parties.** We may receive Technical Data from analytics providers such as Google, based outside the EU.

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information for the following reasons:

* To provide you with information or products relating to the services provided by Allerdale Borough Council where you have consented to be contacted for such purposes;
* To allow you to participate in interactive features of our service, when you choose to do so;
* To provide appropriate details to agents/landlords;
* To notify you about any changes to our service;
* Because we have a legitimate business interest.

You will be asked in advance for your consent for inclusion in each instance, you can alter your preferences at any time in the “My Account” section of your account page.

**5.1 Data acquired through site visitor tracking**

Like most websites, this site uses Google Analytics (GA) to track user interaction. We use the data from GA to determine how many people are using our site, how people find and use our web pages, and to visualise user journeys through the website.

Although GA records Technical Data, none of this information makes you personally identifiable to us. Your computer’s IP address is also recorded by GA and presents a potential way for you to be personally identified; however, Google do not grant us access to this information. We consider Google to be a third-party data processor (see section 8.0 below).

GA makes use of cookies, details of which can be found on Google’s developer guides. Our website uses the analytics.js implementation of GA. Disabling cookies on your internet browser will stop GA from tracking any part of your visit to pages within this website; however, this may have an impact on the website display quality. You can find out more about our cookies on our dedicated cookies page.

**5.2** **Data acquired when creating property reviews**

If you add a review to any of the properties published on this site, your name and any additional details you enter, along with your comment, will be saved to this website’s database, along with the time and date that you submitted the review. This information is only used to identify you as a reviewer of the respective property and is not passed on to any of the third-party data processors detailed below. Only the information you directly enter will be shown on the public-facing website (please do not enter any sensitive or personal information that you do not wish to be made public).

Your review and its associated data will remain on this site until we see fit to either;

* remove the review, or
* remove the property.

Should you wish to have the review and its associated personal data deleted, please contact us (don’t forget to provide us with your name and the property you have reviewed).

If you are under 16 years of age you MUST obtain parental consent before posting a review on any properties.

NOTE: You should avoid entering personally identifiable information to the review section of any property.

**5.3 Data acquired when using contact forms and email links**

If you choose to contact us using the contact form (on our Contact us page), or via email, none of the data that you provide will be stored by this website. This data will not be passed to or be processed by any of the third party data processors defined in section 8. Instead the data will be collated into an email and sent to us over the Simple Mail Transfer Protocol (SMTP).

NOTE: Our SMTP servers are not encrypted by TLS or SSL, and we strongly recommend that you do not send any sensitive information over email.

**5.4 Data acquired when creating an account**

We provide the ability for users to create an account to make their property search easier and faster, but this functionality is entirely optional. Should you choose to create an account with us, your data will be handled as outlined below:

* Passwords are stored in a non-reversible encryption string. This means that nobody can see what your password is (e.g. the word "example" could look like this "61EA0803F8853523B777D414ACE3130CD4D3F92DE2CD7FF8695C337D79C2EEEE"). We also salt your password with additional information, to ensure the encrypted password does not resemble your original password;
* The information held on you will, typically, be Contact and Identity Data. You are free to add, delete or update the information we hold about you, using the account area of the website. You are also free to use the ‘unsubscribe’ button on your account dashboard to completely remove your account and all the associated data;
* The data you provide when creating your account will be included in our backups. Our database is backed up, encrypted and stored on 3 different servers for secure storage.

**5.5 Data acquired when using the message boards**

When using the message board functionality on our site, the name and any details you enter alongside your message will be saved to the website’s database, along with the time and date that you submitted the post or reply. This information is used to identify you as a user of the message board and is not passed on to any of the third-party data processors detailed below (Section 13.0). Only the information you enter onto the message board will be shown on the public-facing website. This will typically include your name, a subject message and the message content.

NOTE: please do not enter any sensitive or personal information that you do not wish to be made public.

Your post and its associated data will remain on this site until:

* the expiry date set in the post has passed; or
* an administrator removes the post/reply; or
* an administrator removes the message board thread.

Should you wish to have any post/reply and its associated personal data deleted, please contact us (don’t forget to provide us with all the details regarding your request, including the reason for removal). If you have chosen to create an account , as highlighted in section 5.4, you will have the option to log into your account and delete any posts you have submitted on the message board.

If you are under 16 years of age you MUST obtain parental consent before posting on the message board.

Useful Points to consider while using the message boards:

* If you put your contact details in the body of your message these will be publicly available;
* Take steps to verify the identity of anyone who you make contact with;
* Beware of anyone requesting money in advance, especially anyone requesting money via Western Union (this is a scammers method of choice).

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**6.0 Data Security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and these are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

**7.0 About this website’s server**

This website is hosted by our third party processor, Localpad which forms part of the Pad Group Limited group of companies, and is stored on servers provided by Fasthosts. These servers are located in the UK and are solely used by Pad Group Limited.

Some of the data centre’s more notable security features are as follows:

* CCTV covering all areas of the data centre’s and corporate offices.
* Highly experienced security guards on duty 24/7, 365 days a year.
* Role-based access control swipe-card system across multiple secure areas to ensure absolutely no access by unauthorised personnel.
* Awarded ISO 27001 certification – an international standard given to data centre’s that reach the top-level of security, safety and compliance.

Full details of FastHosts' data centre can be found here.

All traffic (transferal of files) between this website and your browser is encrypted and delivered over HTTPS.

**8.0 Disclosure of your Personal Information**

We use a number of third parties to process personal data on our behalf. We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third party processors to use your personal information for their own purpose and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Localpad are acting as processors based in the United Kingdom who provide IT and system administration services.

This website directly uses the services of: Google (Privacy policy) ShareThis (Privacy policy)

**9.0 Data breaches**

Upon discovery of a data breach, we will notify the Supervisory Authority within 72 hours, unless the breach is unlikely to impact the data subjects. Where exposure presents a high-risk to the Data Subjects, we will communicate accordingly with the Data Subjects, and, if necessary, inform the relevant law enforcement authorities.

This process applies to all data breaches, and includes any data breach from with website’s database, or the database(s) of any of our third party data processors.

**10.0 Data retention**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including the purposes of satisfying any legal, accounting or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk and harm from unauthorised use or disclosure of your personal data, the purposes of which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

**11.0 Data subject access requests**

Under certain circumstances, you have the right under data protection laws in relation to your personal data. You have the right to:

* **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it;
* **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us;
* **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request;
* **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms;
* **Request restriction** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it;
* **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you.

If you wish to exercise any of the rights set out above, please contact the DPO.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable free if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case we will notify you and keep you updated.

**12.0 Changes to our privacy policy**

This privacy policy may change from time to time, in line with legislation or industry developments. We will not explicitly inform our clients or website users of these changes. Instead, we recommend that you check this page occasionally for any policy changes.