

Policy Name	Website Privacy and Cookie Policy
Policy Category	Corporate
Policy Number	C28
Application	Lochaber Care & Repair
Officer Responsible	Chief Executive
Date to Board of Management	27th August 2018
Next Review Date	August 2023

This website is operated and controlled by Lochaber Care & Repair. (LCR).

This privacy and cookie policy (together with any other documents referred to within this privacy and cookie policy) sets out how we use any personal information that we collect from you, or that you provide to us.

LCR is committed to protecting and respecting your privacy. For the purposes of the data protection legislation, the controller of your personal information is Lochaber Care & Repair, registered with the Information Commissioner's Office (registration number ZA078489).

The information we collect

We may collect, use and store personal information about you when you:

- access our website;
- contact us through our website; and
- contact us by phone, email, social media or otherwise, we may keep a record of that correspondence.

We collect your personal information either directly from you or indirectly (for example, your browsing activity – please see the 'Cookies' section below).

The information you give us may include your name, email address, details of your device, particulars of your social media account and your experiences of different facilities and services on our website where you consider that improvements are required to facilitate hearing, communication and participation in conversation through our website.

IP addresses

We may collect information about your computer, including, where available, your IP address, operating system, browser type and version, time zone setting and browser plug-in types and versions for system administration and to collate aggregate information. This

is statistical data about our users' browsing actions and patterns, and does not identify any individual.

How we use your information

We use information held about you in the following ways:

- to respond to your enquiries and requests;
- to improve our website and to ensure that content from our website is presented in the most effective manner for you and for your computer or other access device;
- to administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to notify you about changes to our service or to our business services that may affect you;
- to improve service delivery;
- to keep our website safe and secure;
- to comply with any legal obligations.

Our Lawful Basis for Using Your Information

When we use your personal information we are required to have a lawful basis for doing so. There are various different lawful bases upon which we may rely, depending on what personal information we process and why.

The lawful bases we may rely on include:

- **consent:** where you have given us clear consent for us to process your personal information for a specific purpose (in limited circumstances);
- **contract:** where our use of your personal information is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract;
- **legal obligation:** where our use of your personal information is necessary for us to comply with the law;
- **public task:** where our use of your personal information is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law;
- **legitimate interests:** where our use of your personal information is necessary for our legitimate interests or the legitimate interests of a third party (unless there is a good reason to protect your personal information which overrides our legitimate interests).

Who We Share Your Personal Information With

The information you provide to us will be treated as confidential. However we may disclose your information to other third parties who act for us for the purposes set out in the policy or for purposes approved by you.

In the event that we do share personal information with external third parties, we will only share such personal information strictly required for the specific purposes and take reasonable steps to ensure that recipients shall only process the disclosed personal data in accordance with those purposes.

How we store your personal information

Your personal information is stored on our electronic filing system and our servers based in the UK and EU, and is accessed by our employees for the purposes set out above.

If we are required to transfer your personal information outwith the EU, we will provide you with information regarding the safeguards that we have put in place with the recipient country to protect your personal information.

How Long We Keep Your Personal Information For

We will only keep your personal information for as long as necessary for the above purposes and to safeguard LHAPS in the event of any claims, complaints, litigation, enquiries or investigations. We have a data retention policy that sets out the periods for retaining and reviewing all information that we hold. This sets out different retention periods and you can request a copy by contacting us at DPOLHAGroup@lochaberhousing.org.uk

Your rights

You can exercise any of the following rights by writing to the Data Protection Officer at 101 High Street, Fort William, PH33 6DG or emailing DPOLHAGroup@lochaberhousing.org.uk We have appointed Harper Macleod LLP as our Data Protection Officer who should be contacted using the contact details above.

Your rights in relation to your personal information are:

- you have a right to request access to the personal information that we hold about you by making a "subject access request";
- if you believe that any of the personal information that we hold about you is inaccurate or incomplete, you have a right to request that we correct or complete your personal information;
- you have a right to object to and/or request that we restrict the processing of your personal information for specific purposes;
- if you wish us to delete the personal information that we hold about you, you may request that we do so; and

- if you would like to obtain the personal information that we hold about you to reuse it for your own purposes, may request that we do so.

Any requests received by LHAPS will be considered under applicable data protection legislation. If you remain dissatisfied, you have a right to raise a complaint with the Information Commissioner's Office at www.ico.org.uk

External links

Throughout our website we may link to other websites owned and operated by certain trusted third parties to direct you to useful websites, for example, Lochaber Care & Repairs' website. These other third party websites may also use cookies or similar technologies in accordance with their own separate cookie policies. For privacy information relating to these other third party websites, please consult their cookie policies as appropriate.

Cookies

A cookie is a small text file which is placed onto your device (for example, your computer, smartphone or other electronic device) when you use our website. We use cookies on our website. These help us recognise you and your device and store some information about your preferences or past actions.

For example, we may monitor how many times you visit the website, which pages you go to, traffic data, location data and the originating domain name of a user's internet service provider. This information helps us to build a profile of our users. Some of this data will be aggregated or statistical, which means that we will not be able to identify you individually.

You can set your browser not to accept cookies and the websites below tell you how to remove cookies from your browser. However, some of our website features may not function as a result.

For further information on our use of cookies, including a detailed list of your information which we and others may collect through cookies, please see below.

Our use of cookies

We use cookies on this website to:

- recognise you whenever you visit this website (this speeds up your access to the website as you do not have to log in each time);
- obtain information about your preferences and use of our website;
- carry out research and statistical analysis to help improve our content and services and to help us better understand our users' requirements; and
- make your online experience more efficient and enjoyable.

For further information on cookies generally visit www.aboutcookies.org or www.allaboutcookies.org

Types of cookies

The cookies we place on your device fall into the following categories:

- Session cookies – these allow our website to link your actions during a particular browser session. These expire each time you close your browser and do not remain on your device afterwards;
- Persistent cookies – these are stored on your device in between browser sessions. These allow your preferences or actions across our website to be remembered. These will remain on your device until they expire, or you delete them from your cache;
- Strictly necessary cookies – these cookies are essential for you to be able to navigate our website and use its features. Without these cookies, the services you have asked for could not be provided;
- Performance cookies – these cookies collect information about how you use our website, for example, which pages you go to most often. These cookies do not collect personally identifiable information about you. All information collected by these cookies is aggregated and anonymous, and is only used to improve how our website works; and
- Functionality cookies – these cookies allow our website to remember the choices you make (such as your user name, language, last action and search preferences) and provide enhanced, more personal features. The information collected by these cookies is anonymous and cannot track your browsing activity on other websites.

The cookies we use

The table below provides more information about the cookies we use and why:

The cookies we use	What they do
Google Analytics (_ga, _gat, _gid and collect)	This is a web analytics service provided by Google Inc which uses cookies to show us how visitors found and explored our site, and how we can enhance their experience. It provides us with information about the behaviour of our visitors (for example, how long they stayed on the site, the average number of pages viewed) and also tells us how many visitors we have had.
CONCRETE5	To track the status of a visitor to the site (logged in, or not)

Consent to use cookies

We will ask for your permission (consent) to place cookies or other similar technologies on your device, except where these are essential for us to provide you with a service that you have requested. There is a notice on our home page which describes how we use cookies and requests your consent to place cookies on your device.

How to turn off cookies

If you do not want to accept cookies, you can change your browser settings so that cookies are not accepted. If you do this, please be aware that you may lose some of the functionality of this website. For further information about cookies and how to disable them please go to the Information Commissioner's webpage on cookies: <https://ico.org.uk/for-the-public/online/cookies/>