

SHREWSBURY DRAPERS PRIVACY STATEMENT

WHAT THIS STATEMENT COVERS

The Shrewsbury Drapers organisations (including Shrewsbury Drapers Holy Cross Ltd ('SDHC'), Shrewsbury Drapers Company Charity, and Shrewsbury Drapers Company (the Guild)) hold personal data about residents, members, staff, volunteers, and others in connection with our work. We use that data to manage almshouse accommodation and Guild activities, and meet our legal obligations.

We do not sell your data or share it for commercial purposes. You have the right to see what we hold about you, and to ask us to correct or delete it. If you have any questions, email us at coysec@shrewsburydrapers.org.uk.

More detail on each topic is set out in the sections below. Our full Data Protection Policy is available on request.

1. WHO WE ARE

This website is shared by all legal entities linked within the Shrewsbury Drapers. For data queries, please contact us at:

coysec@shrewsburydrapers.org.uk

Shrewsbury Drapers Holy Cross Ltd, Drapers Place, Horsefair, Shrewsbury, SY2 6BP

2. WHAT DATA WE HOLD AND WHY

We collect only the minimum data necessary for each purpose. The main categories are:

RESIDENTS AND APPLICANTS

We hold data about current and prospective residents to manage applications, verify eligibility as charity beneficiaries, and administer licences to occupy. This includes contact details, next of kin, and (where volunteered or necessary for welfare or safeguarding) health or disability information.

STAFF AND VOLUNTEERS

We hold employment and volunteer records, including payroll details, absence records, and DBS check outcomes where deemed relevant.

TRUSTEES AND DIRECTORS

We hold the information required by the Charity Commission, Companies House, and the Regulator of Social Housing.

WEBSITE VISITORS

We collect anonymised, statistical data about how our website is used. If you contact us via the website we use your details only to respond to your query. See Section 5 for information about cookies.

CCTV

We operate CCTV cameras at our properties for the security and safety of residents, staff, and visitors. Footage is retained for a maximum of 31 days unless required for an active investigation. Prominent signage is displayed wherever CCTV is in operation.

3. OUR LAWFUL BASIS FOR PROCESSING

Depending on the activity, we rely on one or more of the following lawful bases:

- **CONTRACT:** e.g. to administer licences to occupy and employment contracts
- **LEGAL OBLIGATION:** e.g. to comply with charity, company, housing, employment, and safeguarding law
- **LEGITIMATE INTERESTS:** e.g. to verify beneficiary eligibility, operate CCTV, and manage the charity effectively
- **VITAL INTERESTS:** e.g. in genuine emergencies where a resident's life may be at risk
- **CONSENT:** e.g. where we ask for it specifically, e.g. for health data voluntarily shared by a resident

Where we hold sensitive ('special category') data (e.g. health information or DBS outcomes) we apply an additional legal condition as required by UK GDPR. We do not hold sensitive data unnecessarily.

4. WHO WE SHARE YOUR DATA WITH

We do not sell personal data. We share it only where necessary and lawful, including with:

- Payroll, pension, and IT providers acting as our data processors under contract
- The Charity Commission, Companies House, and the Regulator of Social Housing
- HMRC and other statutory bodies where required by law
- The Housing Ombudsman if a complaint is escalated
- Repairs and maintenance contractors (limited to the information needed to carry out the work)
- Support organisations and charities, where a resident has consented or where we have another lawful basis to share information for welfare or safeguarding purposes
- Local authority safeguarding teams, emergency services, or statutory agencies where required by law or to protect a resident's vital interests
- Solicitors or insurers in connection with a legal claim or incident

We do not transfer personal data outside the UK without appropriate safeguards in place.

5. COOKIES

Cookies are small files stored on your device when you visit a website. We use cookies to understand how our site is used; they collect statistical data only and do not identify you personally. You can disable cookies at any time in your browser settings. For guidance visit www.aboutcookies.org.

Our website may contain links to third-party sites. We are not responsible for their privacy practices and recommend you review their policies before providing any personal data.

6. HOW LONG WE KEEP YOUR DATA

We keep personal data only for as long as necessary. Key retention periods are:

- **Resident files:** 6 years after cessation of LTO
- **Staff personal files:** 6 years after employment ceases
- **Unsuccessful resident applications:** 1 year
- **CCTV footage:** maximum 31 days (longer only if subject to an active investigation)
- **Trustee/director personal files:** 6 years after ceasing to hold the role

Data is disposed of securely. Our full retention schedule is set out in the Data Protection Policy.

7. YOUR RIGHTS

Under UK data protection law, you have the following rights:

ACCESS	Request a copy of the data we hold about you.
RECTIFICATION	Ask us to correct inaccurate data.
ERASURE	Ask us to delete your data in certain circumstances.
RESTRICTION	Ask us to limit how we use your data.
OBJECTION	Object to processing that causes you damage or distress.
PORTABILITY	Receive your data in a portable, machine-readable format.

SUBJECT ACCESS REQUESTS (SARS)

You can request a copy of the personal data we hold about you by making a Subject Access Request in writing to coysec@shrewsburydrapers.org.uk. We will ask you to verify your identity and will respond within 30 calendar days.

SOCIAL TENANT ACCESS TO INFORMATION REQUIREMENTS (STAIRS)

From 1 April 2027, STAIRs legislation will give residents and their representatives additional rights to request information about the management of their homes. We will provide further detail closer to that date. In the meantime, please contact us with any queries.

8. CONCERNS AND COMPLAINTS

If you have a concern about how we handle your personal data, please contact us in the first instance at coysec@shrewsburydrapers.org.uk.

If you remain dissatisfied, you have the right to complain to the ICO:

Information Commissioner's Office

www.ico.org.uk

Telephone: 0303 123 1113

This statement is reviewed regularly. The current version is available on our website and on request.