

## Privacy statement for customers

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### 1. Introduction

- 1.1 This is the Aareon UK Limited (Aareon) Privacy Notice. Aareon is part of a group of companies with [Aareon AG](#) acting as the Parent Company who are based in Germany. This Privacy Notice describes the categories of personal identifiable information (PII) we process and for what purposes. We are committed to collecting and using data fairly and in accordance with the requirements of the UK's Data Protection Act 2018 (DPA) and the General Data Protection Regulation (GDPR).
- 1.2 We take your privacy seriously and you can find out more here about your privacy rights and how we collect, use, share and secure your PII. This includes the information we already hold about you and any further information we might collect about you, either direct from you or from a third party.
- 1.3 This Policy sets out our commitments and demonstrates our compliance with the Data Protection Laws in the countries in which we operate. It explains how we collect, use, store, share and secure your personal information and how we comply based on our relationships and processing operations with your PII.
- 1.4 Our site may, from time to time, contain links to and from the websites of our commercial partners, other regional bodies, advertisers, volunteering platform and clubs. If you follow a link to any of these websites, please note that these websites have their own privacy policies and they will be a data controller of your personal information. We do not accept any responsibility or

liability for these policies and you should check these policies before you submit any personal information to these websites.

- 1.5 In addition, if you linked to this Site from a third-party site, we cannot be responsible for the privacy policies and practices of the owners or operators of that third-party site and recommend that you check the policy of that third party site and contact its owner or operator if you have any concerns or questions.
- 1.6 This Privacy Notice is a public document available when Aareon obtain and use your PII as a data processor, in the supply of our services and products to our clients and partners. On our website we have also published a second Notice which highlights how we demonstrate our compliance as a data controller, for our own recruitment, employee, accounting and marketing purposes.
- 1.7 This Privacy Notice will be updated when required, we recommend you keep yourself informed by reviewing this notice from time to time.
- 1.8 This Notice demonstrates how we as an appointed data processor for our housing, care and support clients provide software solutions to enable them process and manage their housing services and the personal information regarding individuals contained within these solutions will be managed in line with the DPA and GDPR. This will include their employees and contractor's details. In all circumstances we obtain and process individual's personal identifiable information in order to conduct our normal business operations and to deliver products and services to our current and prospective clients.
- 1.9 The difference between a data controller and data processor is important. Aareon carries out functions on behalf of other Data Controllers, (our clients) this means we act as their Data Processor. We carry out functions which may involve individuals PII on behalf of our clients and these processing operations are based on their instructions and under a contract. Aareon also determines the use of individuals PII, as a prospective, current or former employee as well as when we process your information when carrying out our marketing operations. This means we are the Data Controller, when carrying out these activities.
- 1.10 As we hold and process a volume of individual's PII including special categories of information, for our clients (data controllers), as part of our core activities we have appointed a Mandatory Data Protection Officer (MDPO), their details are below and you can contact them if you have questions about your data, data protection, your rights or wish to make a complaint:

**By post:**

Information Assurance Manager  
Aareon UK Limited  
Building 500  
Abbey Park  
Stareton  
Kenilworth  
CV8 2LY

**By email:**

[DP@Aareon.com](mailto:DP@Aareon.com)

**By phone:**

02476 323 723

## 2. Visitors to our websites and marketing

- 2.1 Visitors to our website are important as we want to supply you with full access to the services, products we offer across Aareon and Aareon AG and our preferred Partners. When you visit our websites we have a full '[cookie](#)' privacy notice. It is important you read this as it supplies details of how we collect, monitor, use, share, retain and secure your PII.
- 2.2 We will obtain information from you when you request a contact / call back and/or a demonstration of one of our products and services. We have a marketing data base and only hold PII of individuals who have:
- Supplied consent to be contacted for marketing purposes
  - Requested information about our products and services
  - Supplied their contact details at events, conferences or meetings
  - Being a client of Aareon and as part of the performance of contract keep them informed on updates to existing products purchased/leased and/or new products and services on a like for like basis
  - Being a client of Aareon we may use our legitimate interests to keep you informed of new products and services which in our opinion will be a benefit to your business.
- 2.3 Individuals can unsubscribe at any time to receiving marketing or like for like messages by telephoning 02476 323 723 or direct mail or by emailing [dp@aareon.com](mailto:dp@aareon.com). This cannot apply to clients where Aareon have to keep them informed on current product updates under the performance of a contract.
- 2.4 Aareon UK provides and sells products and services in the form of software solutions to our clients, where we process personal information relating to their customers (data subjects). As a data processor for our clients we have contractual obligations in regards to data protection. The products and services we provide are:
- Integrated Housing Management System – Aareon QL
  - Aareon 360
  - Tenant Self Service
  - 1st Touch
  - Trace and Treasury

- QL Finance
- CRM

Where we host our client's information, we do so in a secure manner in compliance with the law, with all your client data being held within the EU.

### 3. Your privacy rights

3.1 With the DPA and GDPR you have eight rights relating to the use and storage of your PII. A Data Controller has to comply with these rights, which are:

- The right to be informed - You have the right to be informed about the collection and use of your personal data. This is a key transparency requirement under the GDPR. We will provide you with information including: our purposes for processing your personal data, our retention periods for that personal data, and who it will be shared with.
- The right of access – You have the right to a copy of the information we have on you.
- The right to rectification – You have the right to have inaccurate PII data rectified, or completed if it is incomplete.
- The right to erasure – You have the right to have your data erased.
- The right to restrict processing - You have the right to request the restriction or suppression of your personal data. When processing is restricted, we are permitted to store the personal data, but not use it.
- The right to data portability - The right to data portability allows you to obtain and reuse your personal data for your own purposes across different services. It allows you to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without affecting its usability.
- The right to object - You have the right to object to the processing of their personal data in certain circumstances. You do have an absolute right to stop your data being used for direct marketing.
- Rights in relation to automated decision making and profiling - The GDPR has provisions on:
  - automated individual decision-making (making a decision solely by automated means without any human involvement); and
  - profiling (automated processing of personal data to evaluate certain things about an individual). Profiling can be part of an automated decision-making process.
  - Where decisions are made solely by automated means you have the right to request a review by a human.

3.2 Aareon UK in its role as a data processor will in the majority of cases refer you back to your employer/housing provider as the data controller for your PII. We will assist where requested by our client.

3.3 Aareon UK has a legal obligation to answer all requests in relation to your rights. Some of these rights are not absolute, e.g. where you are still under a contract, you will not be able to have your data erased.

- 3.4 You can make a complaint if you feel Aareon UK is using your personal identifiable information unlawfully and/or holding inaccurate, inadequate or irrelevant personal identifiable information which if used may have a detrimental impact on you and/or has an impact on your rights. If you wish to make a complaint, please refer your complaint to our Information Assurance Manager, their details are noted above.
- 3.5 You can also make a complaint to the data protection supervisory authority. In the UK, this is the Information Commissioner's Office, at <https://ico.org.uk>. You can view other supervisory authorities and details of countries where your PII is held and processed [here](#).
- 3.6 To make enquires for further information about exercising any of your rights in this Privacy Notice, please contact our Information Assurance Manager, their details are above.

#### **4. What Kinds Of Personal Identifiable Information we use?**

##### **4.1 Where you are a prospective client**

###### **Personal Information**

- Contact details - name, email, contact numbers

##### **4.2 Where you are a client**

###### **Personal Information**

- Same as above
- Bank details to pay for the service
- Your client data, personal and special category
- Their next of kin/other occupant details within the household
- Your contractor data which may include financial records - depending on the product purchased
- Your staff's personal details, name, email, opinions, notes, etc.

Where we are acting as a data processor with our clients we will have entered into a contract to deliver software services and platforms which hold individuals personal and special information. It will be our clients', as the Data Controllers, responsibility to issue a privacy notice and we will co-operate in this process.

- 4.3 Sometimes where we ask for your PII to enter into a contract/agreement, e.g. in relation to our relationship with you in the performance of a contract or as we have a legal or regulatory duty. It could be a simple process of attaching a cookie to enable a transaction to take place. We will not be able to provide some of our services or products without this information.

## 5. How We Gather Your Personal Identifiable Information

- 5.1 We obtain PII by various means; this can be by face to face, email, telephone, correspondence and/or by receiving this information from others, for example: an authorised person representing you e.g. the police. We can also receive information about you from other people who know you and/or are linked to you, for example: nominated person to act on your behalf, your legal representative.
- 5.2 Some further examples of how we may gather your personal identifiable information are set out below:
- from monitoring or recording calls as part of quality and complaints monitoring: we record these calls for training and to ensure the safety of our staff;
  - from monitoring your use of our website; and
  - from social media should as LinkedIn

## 6. How We Lawfully Use Your Personal Information

- 6.1 The table below sets out the processes and the legal gateway we rely on to process the data:

Purpose / Activity	Lawful ground to process
To keep prospective clients informed of our products and services	Consent
When we engage with you as a potential client/a client	Performance of a contract
Invoice you as a client	Performance of a contract
Chase an outstanding debt	Performance of a contract
To keep you informed of products and services, updates	Performance of a contract and/or Legitimate interests
To manage our relationship with you, updating our terms of business or this privacy notice	Performance of a contract and/or Legal requirement
Administer and support your business processes (troubleshooting, maintenance, testing, support and hosting the data)	Performance of a contract
Administer and support our business products, processes and website (troubleshooting, maintenance, data analysis, testing, support, reporting and hosting the data)	Legitimate business need to ensure our products/services/systems are running correctly and are complainant. Legal obligation
Data analytics to improve our websites, services, experience, customer relationships	Legitimate business need to ensure we are learning from our customers and prospective customers and to improve our services

Informing you of new products and/or services – prospective client	Consent
Informing you of new products and/or services – client	Legitimate interest

When we consider using your information for legitimate interests we will consider if it is fair to use the PII either in our interests or someone else's interests, and only where there is no disadvantage to you – this can include where it is in our interests to contact you about like for like products or services from Aareon UK to a business or a person. Where we carry out direct marketing operations with businesses we will carry out a marketing assessment to market to you, or collaborate with others to improve our services. Where we need to seek your consent we will, if required.

Where we have your consent, you have the right to withdraw it, emailing [dp@aareon.com](mailto:dp@aareon.com) or telephoning 07426 323 723.

## **7. Automated decision making**

7.1 We do not carry out any automated decision making as part of our processing operations.

## **8. Sharing Your Personal Information or Getting Your Personal Identifiable Information from Others**

8.1 We may share your information with selected third parties including:

- business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- analytics and search engine providers that assist us in the improvement and optimisation of our website
- or parent company.

## **9. Data Transfers**

9.1 Whenever we transfer your personal data inside or out of the European Economic Area (EEA), we ensure an appropriate degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the states of the EEA. If your data is being transferred to the US you will be made aware of this when this happens.

9.2 Our directors and other appointed individuals working for Aareon may, in limited circumstances, access individuals PII outside of the UK and European Union, e.g. if they are remote working, absent from the office and need to access critical business information or working abroad outside of the UK or European Union. If they do so they will be using our security measures and will be subject to their arrangements with us which are subject to English Law, in line with the GDPR and the same legal protections that would apply to accessing personal data within the UK.

## **10. How Long We Keep Your Personal Information For**

10.1 The length of time we keep your personal information for depends on the services we deliver to you. We will never retain your PII for any longer than is necessary for the purposes for which we need to use it. This is normally identified within the contract terms.

10.2 Where you have provided your information as a prospective client we will keep your details for as long as you continue to consent to receiving information from us.

## **11. Keeping You Up To Date**

11.1 We will communicate with you about products and services we are delivering using any contact details you have given us - for example by post, email, text message, social media, and notifications on our 'App' or website. Where you have given us consent to receive marketing, you can withdraw consent, and update your marketing preferences by contacting us directly.

11.2 If you wish to withdraw your consent at any time, please email [dp@aareon.com](mailto:dp@aareon.com) or telephone 02476 323 723.

## **12. Confidentiality and security**

12.1 We have implemented security policies, rules and technical measures to protect individual's personal information that we have under our control from:

- Unauthorised access
- Improper use or disclosure
- Unauthorised modification
- Unlawful destruction or accidental loss

12.2 All our employees, representatives, board members and third party contractors (data processors) which we engage, who have access to, and are associated with the processing of your personal information, are obliged to respect the confidentiality and only process the information based on our instructions. We ensure that your personal information will not be disclosed until all security assurances have been documents.



### **13. Aareon Commercial and Employee Information**

- 13.1 When someone visits our website we will collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. We collect this information in a way which does at times identify a person who contacts us about a product. We do not make any attempt to find out the identities of those visiting our websites as a routine search. If we do want to collect PII through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.
- 13.2 The information held and published on our website and associated websites is only to be used for the purposes it has been published for. We do not consent to any organisation, member of the public to take individuals (data subjects) personal information from our website and use this for their own purposes without Aareon written consent. You can use this to contact us and discuss our services and product options or share with another organisation who you feel would be interested in contacting us.
- 13.3 In the case of unlawful use, we reserve the right to review and carry out legal proceedings.