# **Housing Partners Ltd**

Data Processing Annex

## **Data Processing Annex - HomeSwapper**

#### 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 subscribing landlords and applicants/customers is retained for 12 months after account deactivation. 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:

- Name
- Sex
- Date of Birth
- Contact information
- Health information
- Financial Information
- Property Information
- 4. Categories of Data Subjects
- Tenant

#### 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.
Salesforce	Landlord usernames,	Help desk/customer service software
	contact details, tenant	solution.
	user details	Data is hosted within the EU.
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SendGrid	Email address and message contents.	SendGrid provides a solution for tenant to tenant messaging
		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.
		SendGrid complies with the Privacy Shield Principles for all onward transfers of Personal Information from the EEA, United Kingdom, and Switzerland.
Experian	Tenant name, address and date of birth	To process, verify and append data as per the terms of service
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 Solvous 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.