



Policy:	Inclusion Group Privacy and Cookie Policy
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Approved by	IG Board of Management
Date Approved	Sept 21, Oct 24, June 2026
Lead officer/post	Business Director/Data Protection Officer
Business area:	Business

Who are Inclusion Group?

Inclusion Group Limited (reg: 12505808) is the parent company of the following subsidiaries:

- Inclusion Housing Community Interest Company (Reg: 06169583)
- Inclusion Homes CIC (Reg: 12929107)
- Inclusion Property Holdings Limited (Reg: 12768963)
- INsted Limited (Reg: 15041758)
- HausIN Facilities Management Limited (16286324)

This policy covers Inclusion Group and all its current and future subsidiaries.

Cookie Policy

What are cookies?

Cookies are small files that are placed on your computer by websites when you visit them. As well as providing information to the owner of the website they are sometimes needed to either make the website work or to make the website work more efficiently. Cookies contain information that is transferred to your computer's hard drive.

Why does Inclusion Group use Cookies?

As well as gaining a better understanding of how visitors use our website and platforms, cookies enable us to better tailor what we provide online to suit our visitor's needs based on their usage which in turn improves user friendliness. In order to do this some cookies are applied when you enter our website/platform however they are collected in a non-personally identifiable format and the details of the cookies we use can be found at the bottom of this page. Please note that the names of cookies may change over time.

What types of cookies does Inclusion Group use?

Strictly necessary cookies. These are cookies needed only for the operation of a website and if they were not used the website would not work correctly, because of this we do not ask for your specific consent for these however for all other cookies your informed consent is required.

Session cookies

These are temporary cookie files that are deleted once you close the browser which means that when you revisit the site you will be treated like a new visitor.

Analytical/Performance cookies

These cookies allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that you can find what you are looking for easily.

Targeting cookies

These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose. These cookies are also used to prevent underage users from certain activities.

Cookies that send information to us

The cookie that is placed by the Inclusion Group domain on a user's computer is called a First Party Cookie. By default, browsers allow first party cookies as they remember the user whilst they are navigating around the website and stop the need for the user to keep confirming details and agreeing preferences.

Cookies that send information to other companies

Third Party Cookies are set on the Inclusion Group website or platforms by third parties i.e., Facebook. They may use the data collected from these cookies to anonymously target advertising to you on websites based on your visit to the Inclusion website/platform. An example of this is if you click on the Inclusion Group Facebook link from the Inclusion website, your 'like' or 'share' will be recorded by Facebook (as they set the cookie) and your data will be collected.

Demographics and Interest Reporting

Our website and platforms use Google Analytics Demographics and Interest Reporting. This is used to allow us to target advertising based on what is relevant to a user and improve the reporting of website usage etc. We will not use any information we receive through Google Analytics Demographics and Interest Reporting to identify any individual user of our site.

Cookies used on our websites

Further details of cookies used on our website can be found below. Please note that the names of cookies may change over time and that cookies will expire according to the timescales on the cookies list.

The following cookies are set by Google Analytics:

- **_ga** Domain - .inclusion-group.org.uk . Type - Analytics. Description - The **_ga** cookie, installed by Google Analytics, calculates visitor, session and campaign data and also keeps track of site usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognize unique visitors. Duration 2 years.
- **_gid** Domain - .inclusion-group.org.uk . Type - Analytics. Description - Installed by Google Analytics, **_gid** cookie stores information on how visitors use a website, while also creating an analytics report of the website's performance. Some of the data that are collected include the number of visitors, their source, and the pages they visit anonymously. Duration 1 day.

The following cookies are session cookies:

- **_gat_gtag_UA_86396990_1** Domain - .inclusion-group.org.uk. Type – Analytics. Description - This cookie is set by Google and is used to distinguish users. Duration – 1 minute.

Changing cookie settings

You can adjust your computer settings to reflect your preference as to whether or not you are happy to accept cookies or not and you can request a warning before cookies are accepted. Instructions on how to do this can be found in the 'help' sections of your computer browser, please note you will have to change the settings on each computer and browser you use to reflect your preferences.

By refusing cookies you may restrict the features of the Inclusion Group website/platforms that you access however cookies are not needed to use many parts of the Inclusion Group website/platforms.

Useful Information

If you would like to find out more about cookies and their use on the internet, you may find the following links useful:

- <https://www.allaboutcookies.org/>
- <https://support.microsoft.com/en-gb/topic/description-of-cookies-ad01aa7e-66c9-8ab2-7898-6652c100999d>
- Further details on https://support.google.com/analytics/answer/2799357?hl=en/t_self#zipppy=%2Cin-this-article
- To adjust your online advertising choices visit <https://www.youronlinechoices.com/uk/your-ad-choices>
- Your display advertising preferences are adjusted through Google Ad Settings <https://tools.google.com/dlpage/gaoptout>
- For more information on the legislation regarding cookies please visit <https://ico.org.uk/>

Contact us

Write to us – Inclusion Group, 106 Heworth Green, Heworth, York YO31 7TQ

Email us - If your query isn't urgent, please get in touch with hello@inclusiongroup.co.uk

Phone us - urgent requests should always be called through to us on 01904 675207

Our Data Protection Officer

Under The United Kingdom General Data Protection Regulation (UK GDPR) and The Data Protection Act 2018, we are required to appoint a DPO to help ensure that Inclusion Group is compliant with applicable legislations. Our DPO will oversee all issues relating to the protection of Personal Data and Special Category Data at Inclusion Group, and will:

- Inform and advise Inclusion Group as an organisation, including colleagues at all levels, of their obligations and compliance status under the regulation;
- Cooperate and work with the relevant authorities, including the Information Commissioner (ICO), to ensure The UK GDPR and The Data Protection Act 2018 compliance at Inclusion Group.
- Monitor Inclusion Group's compliance with the regulation, including managing internal data protection activities, staff training, and supporting internal audits.
- Liaise with Inclusion Group's external partners, including suppliers on data protection matters.
- Manage and raise risks relating to data protection from across the business; and support colleagues with, and provide guidance on, data protection.
- All the responsibilities outlined above will help protect personal data for all of our customers and colleagues. For any questions about The UK GDPR and The Data

Protection Act 2018 at Inclusion Group, including the DPO role itself, you can contact the DPO at hello@inclusiongroup.co.uk

Privacy Policy

Summary

This privacy notice will help you understand how we collect, use and protect your personal information. If you have any queries about this privacy notice or how we process your personal information, please contact our Data Protection Officer: hello@inclusiongroup.co.uk or get in touch with us by one of the other methods set out at the end of this notice.

Who we are

The organisation responsible for processing your personal information is Inclusion Group Limited, company number 12505808 at 106 Heworth Green, Heworth, York YO31 7TQ. This means that we are a data controller under The United Kingdom General Data Protection Regulation (also known as UK GDPR) and The Data Protection Act 2018.

This privacy notice also covers our subsidiary companies; Inclusion Housing Community Interest Company, Inclusion Homes CIC and Inclusion Property Holdings Ltd.

What information we collect about you

The personal information you have provided, we have collected from you or we have received about you from third parties may include:

- name, address and address history, date of birth, and gender (and proof of your identity/photo ID)
- your National Insurance Number
- contact details, including telephone number and/or email address
- financial information, including pay slips, bank details and credit/debit card details (although we do not retain complete payment card information)
- details about your family and dependents (e.g. your marital status and number of children) and anyone authorised to act on your behalf if applicable
- proof of housing eligibility, any interest or equity in other property
- information about your living circumstances (e.g. your employment details, income details and home ownership)
- profile data including your preferences, feedback and survey responses
- criminal convictions, information about alleged anti-social behaviour or fraud
- health details and medical history
- information about disabilities or vulnerabilities
- details about your race, ethnicity, religious beliefs, sex life, sexual orientation
- other personal information required to enable us to provide you with the service or support you have requested
- aggregated data such as statistical or demographic data which does not identify you individually

How we collect information about you

We may collect information about you in the following ways:

- when you apply for one of our properties or services or a job by e mail, letter or through our recruitment platform on Indeed
- when you register to receive information from us
- when you call, write, email, text or meet with us or respond to a survey
- when you log a repair request or pay your rent and/or service charge
- when you set up a Direct Debit

- automated technologies or interactions – when you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal - information from you by using cookies and other similar technologies
- when you contact us on social media or use our Live Chat service
- when you make a complaint or provide feedback or participate in consultations.
- when you contact our Customer Call Centre
- when we operate CCTV/sound recording systems for the detection and prevention of crime and to capture evidence of breach of tenancy or anti-social behaviour (appropriate notices will be displayed - - in locations with recording equipment in operation)
- when we take photographs at our events, at our properties and in our communities for general publicity use (we will only use photographs in which you can be identified if you have given us your written consent)
- when we receive information about you from third parties including local authorities, benefit offices, the police, statutory agencies, medical services and support organisations, financial institutions, credit agencies, councillors, MPs or other representatives acting on your behalf

What we use your information for and the legal basis for processing

We process information about you in order to understand, deliver and improve the service you require for example to manage your tenancy, to provide you with housing support to deal with your enquiry or to manage your job application.

The legal basis for processing your information is usually that the processing is necessary for a contract we have with you (e.g., your tenancy or lease) or in relation to discussions before entering into a contract.

We also sometimes need to process your information in order to comply with the law for example when we need to inform the relevant authorities about a benefits fraud.

In other instances, we may have a legitimate interest to process your information for our internal business and administrative functions. Other types of legitimate interest we might have in processing or sharing your personal information may include preventing loss of revenue and fraud prevention. For example, we may pass your details to a debt collection agency if you have not paid your rent or service charge (in pursuit of our legitimate interest in preventing loss of revenue).

The table below sets out the broad categories of information we process and the legal basis for processing it.

Type of personal information	Reason for processing this information	Legal basis for processing
Contact details e.g., name, address, telephone number and email address	In order to contact you and for if our contractors to contact you. We may also appoint a research company to carry out research on our tenants or communities in order to improve the Inclusion Group	Performance or preparation to perform a contract with you and legitimate interests
Proof of Identity e.g., photo ID, NI number, DOB	Proof of housing eligibility e.g., right to rent	Legal obligation

Financial information e.g., proof of income, bank account,	To assess your eligibility for housing or support etc. and enable you to pay your rent and set up a Direct Debit	Performance or preparation to perform a contract with you and legitimate interests
Information about your family, marital status, children, employment details etc.	To assess your eligibility for housing or support	Performance or preparation to perform a contract with you and legitimate interests
Information about rent arrears, ASB etc	To provide a tenancy reference to another landlord	Performance or preparation to perform a contract with you and legitimate interests
Criminal convictions	To assess your eligibility for housing, for support or for a job etc.	Legitimate interests, legal obligation (including for the prevention of crime and protection of individuals)
Information about your race, ethnic origin, religion, sex life or sexual orientation	For monitoring purposes and to comply with employment law	Legal obligation and to carry out obligations and exercise rights in the specific field of employment , social security and social protection law or explicit consent
Information about your health and medical history	To assess your housing needs or working capacity and to ensure appropriate medical assistance is sought in an emergency	Performance or preparation to perform a contract with you and to assess the working capacity of the employee, to provide and manage health and social care services or pursuant to a contract with a health professional Explicit consent Vital interests
Information about potential anti-social behaviour and/or violence	To safeguard our staff and contractors	Legal obligation and legitimate interests
Information about disabilities or vulnerabilities	To assess your needs or working capacity or to safeguard staff	Legal obligation, performance or preparation to perform a contract with you and to assess the working capacity of the employee, to provide and manage health and social care services or pursuant to a contract with a health professional Explicit consent
Emergency contact details	In case of emergency	Vital interests Explicit consent
Marketing and communications	To keep our records updated and to study how you use our products and services	Legitimate interests

Who we may share your personal information with

Where relevant, given the nature of the services provided to you, we may also share your information with the following categories of third parties:

- our contractors and sub-contractors and other organisations acting on our behalf, including our maintenance contractors, social and health care professionals, our careline providers, our out of office telephone service contractor, online payment solution and our mass mailing partners

- we may appoint a research company to carry out research on our customers or communities in order to improve a Inclusion Group service, know more about our customers/communities or establish if there are any gaps in what we are doing, on these occasions if contacted individuals can refuse to participate in the research without prejudice and can opt out of future research by contacting hello@inclusiongroup.co.uk
- doctors, mental health teams
- next of kin, family members
- managing agents
- our landlords
- local authorities
- social services
- the police and other emergency services
- government agencies and departments and regulatory bodies
- utility companies and council tax offices to ensure billing details are correct
- mortgage brokers, financial advisors, surveyors and valuers relating to a property sale
- auditors
- commissioners
- tracing agents, debt collection companies and credit reference agencies
- other bodies for the prevention or detection of fraud
- We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We only permit our third party service providers to process your personal information for specified purposes and in accordance with our instructions.

Security of your information

We are committed to ensuring that your information is kept secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and operational procedures to safeguard and secure the information we collect online.

When you make a payment online, for example when you pay your rent or service charge, we use the third party online payment solution provider First Data UK to process the payment. This company uses an SSL (Secure Socket Layer) technology to protect your personal information. SSL is currently the preferred method to securely transfer credit card and other sensitive information over the internet. This encryption ensures that information sent during any transaction is protected against any unauthorised interception. First Data UK are fully PCI compliant.

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.

Processing your information outside of the EEA

We will not transfer or store your personal information outside of the European Economic Area (EEA) unless:

- the country that we send the information to is approved by the Information Commissioner's Office as providing an adequate level of protection for personal information; or
- the recipient has agreed with us standard contractual clauses approved by the Information Commissioner's Office, obliging the recipient to safeguard the personal information; or

- another situation exists where the transfer is permitted under applicable data protection legislation.

If you choose not to give personal information

We may need to collect certain personal information by law, or under the terms of a contract we have with you.

If you choose not to give us this personal information, it may in certain limited circumstances delay or prevent us from meeting our obligations to you. It may also mean that we cannot perform the services you have asked for. In some circumstances, it could mean that we will need to terminate our relationship with you.

We will always tell you at the time we try to collect such personal data, if your refusal to provide that data may impact on our ability to provide services to you.

Using your personal information for marketing

We may use your personal information to tell you about relevant products and services. This is what we mean when we talk about 'marketing'.

The personal information we have for you is made up of what you tell us, and data we collect when you use our services, or from third parties we work with.

We study this to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

Whatever you choose in relation to marketing, we may still need to contact you for other reasons to enable us to provide the products and services you have asked for and to tell you about changes to your existing contract with us.

We may ask you to confirm or update your marketing and contact choices, if you take out any new products or services with us in future. We will also ask you to do this if there are changes in the law, regulation, or the structure of our business.

If you change your mind about your marketing contact preferences you can update your choices at any time by following the unsubscribe link in any marketing email you receive or by contacting hello@inclusiongroup.co.uk

How long your personal information is kept

We will only keep your information for as long as necessary to fulfil the purpose we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements and in accordance with our retention and disposal guidelines.

Please contact hello@inclusiongroup.co.uk to request a copy of our Data Protection and Access to Information Procedure

Your rights

Under the legislation you have the following rights in respect of your personal information:

- to obtain access to, and copies of, the personal information we hold about you i.e. to make a Subject Access Request (SAR)
- to require that we cease processing your personal information if the processing is causing you damage or distress

- where we rely on your consent to process your personal information, you can withdraw your consent at any time by contacting our DPO at hello@inclusiongroup.co.uk
- to require us not to send you marketing communications
- to require us to erase your personal information
- to require us to restrict or for you to object to our data processing activities
- to receive from us the personal information we hold about you which you have provided to us in a reasonable format specified by you, including for the purposes of you transmitting that personal information to another data controller (right to data portability)
- to require us to correct the personal information we hold about you if it is incorrect
- Please note that these rights may be limited by the legislation and we may be entitled to refuse requests where exceptions apply. You can find out more about your rights from the Information Commissioner's Office.

Should you wish to exercise any of your rights, please contact our DPO by emailing hello@inclusiongroup.co.uk or using the contact details below under "how to contact us".

Visitors to our websites

All of our websites use cookies. To find out more about how we use cookies, please see our cookie policy.

Our websites 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 information about you. We do not control these third-party websites and are not responsible for their privacy notices. When you leave one of our websites, we encourage you to read the privacy notice of every website you visit.

Our websites are not intended for children and we do not knowingly collect information relating to children.

Customers using my CUSTOMER Account

When you create a CUSTOMER Account, we may collect personal information about you to enable you to do things online such as pay your rent, report a repair, request help, set up and manage Direct Debits, manage your account, make a complaint or compliment or apply to rent a home.

The type of information we collect about you and what we need it for is covered in our overarching privacy notice.

When you give us personal information, we take steps to ensure that it is treated securely. Any sensitive information, such as credit/debit card details is encrypted and protected with an SSL connection. When you are on a secure page, a lock icon will appear within the URL.

Where we have given you a password or you have chosen one yourself, to enable access to certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Customers who contact us via social media

When you contact us via social media such as Facebook and Linked In for example, we use a third party contractor called The Whole Caboodle to manage your queries. The system keeps a record of the conversation so that we can effectively manage customer service.

Customers using our Live Chat service

When you use our Live Chat facility, we collect information about the type of device you are using e.g. IOS or android etc.

We also capture the IP address. During the course of the chat conversation, we may obtain personal information from you such as name, address, date of birth to help provide a resolution to your query.

This information is then transferred to our primary housing management system SDM to assist with raising repairs, obtaining information etc.

A record of the chat is recorded within Zendesk (the live chat system) for training and quality purposes recoding a verbatim copy of the chat conversation.

How to complain and Your Right to Make a Complaint

We take any complaints we receive about how we use your personal information very seriously and encourage you to contact us with any concerns about how we collect and use your personal information. We would also welcome any suggestions for improving our procedures and policies.

If you have any concerns about how we collect, use, or protect your personal data, please contact us in the first instance so that we can seek to resolve your concerns.

You also have the right to lodge a complaint with the UK supervisory authority for data protection matters, the Information Commissioner's Office (ICO), if you believe that we have not complied with applicable data protection laws when processing your personal data.

You can contact the ICO at www.ico.org.uk. Making a complaint to the ICO does not affect any other legal rights or remedies that may be available to you.

This privacy notice does not provide exhaustive detail of all aspects of our collection and use of personal information. We are happy to provide any additional information or explanation needed.

Any requests for additional information should be sent to hello@inclusiongroup.co.uk or using the contact details below under "how to contact us".

What to expect if you make a complaint

We will acknowledge receipt of your complaint within 30 days. We will then carry out a thorough and detailed investigation and provide you with the outcome of our findings. This may include details of any lessons learned and any changes we have made as a result of your complaint.

Our Privacy and Cookie Policy which is available on our website www.inclusion-group.org.uk/privacy-policy-cookie-disclaimer/

Changes to this privacy notice

We keep this privacy notice under regular review. This privacy notice was last updated on the 18/06/2026

How to contact us

If you want to request information about our privacy notice or exercise any of your data protection rights, please contact us in any of the following ways:

Email our Data Protection Officer: hello@inclusiongroup.co.uk

Email our call centre (non-urgent enquiries) at Repairs@inclusiongroup.co.uk

Telephone our call centre: 01904 675207

Write to our Data Protection Officer at:

Inclusion Group
106 Heworth Green
Heworth
York
YO31 7QT