

# Privacy & Cookies

## V1.0-31.07.24

### Welcome to the Pinnacle Service Families' privacy notice.

Pinnacle Service Families and Pinnacle Housing Limited are part of Pinnacle Group Limited. This privacy notice is for Service personnel and their families who receive services from Pinnacle Service Families.

We respect your privacy and are committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

Please use the Glossary to understand the meaning of some of the terms used in this privacy notice.

### 1. Important information and who we are

#### Purpose of this privacy notice

This privacy notice aims to give you information on how Pinnacle Service Families collects and processes your personal data on a day to day basis through the provision of services to you and through your use of this website, including any data you may provide through this website when you contact us.

This site and associated forms are intended for use by Families occupying Service Family Accommodation. You may not use our site:

- In any way that breaches any applicable local, national or international law or regulation.
- In any way that is unlawful or fraudulent or has any unlawful or fraudulent purpose or effect.

This website is not intended for children and we do not knowingly collect data relating to children through this website. The exception to this is in relation to data pertaining to children of Service families, which Service personnel provide us in order to determine their families' housing needs.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

#### Controller and Processor Relationship

Pinnacle Housing Limited (trading as Pinnacle Service Families) is part of the Pinnacle Group and has been contracted to the Defence Infrastructure Organisation (referred to as the DIO, part of the Ministry of Defence), to provide accommodation management services

for Service families. In this instance, Pinnacle Housing Limited is the Processor of your data on behalf of the Defence Infrastructure Organisation, who is the Controller of your data.

When we mention “we”, “us” or “our” in this privacy notice we are referring to Pinnacle Housing Limited (trading as Pinnacle Service Families). Pinnacle Service Families is responsible for this website, which has been reviewed and signed off by the DIO.

For reference, Pinnacle Group Limited is made up of different legal entities, details of which can be found [here](#). The privacy notice for Pinnacle Group can be found [here](#).

We have appointed a Data Privacy and Compliance Manager who is responsible for ensuring that any questions in relation to this privacy notice are raised and discussed with the DIO. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact:

- Full name of **Data Controller**: Ministry of Defence (MOD)
- MOD Data Protection Officer: Ian Henderson
- E-mail addresses:
  - [CIO-DPA@mod.gov.uk](mailto:CIO-DPA@mod.gov.uk)
  - [diordaccn-secretariat@mod.gov.uk](mailto:diordaccn-secretariat@mod.gov.uk)
- Postal address: Ministry of Defence, Main Building, Horse Guards Avenue, Whitehall, London, SW1A 2HB.
- Full name of **Data Processor**: Pinnacle Housing Limited
- Email address: [dataprivacy@pinnacleservicefamilies.co.uk](mailto:dataprivacy@pinnacleservicefamilies.co.uk)
- Postal address: Pinnacle Group Limited, 8<sup>th</sup> Floor, Holborn Tower, 137-144 High Holborn, London, WC1V 6PL.

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## 2. Summary

The full details of our privacy notice are set out in the sections below. However, please note the following key points:

- We may receive personal data from you directly and sometimes your personal data may be provided by a third party, for example: the DIO or a third party contractor.
- We will only use your personal data when the law allows us to in order to provide you services, communicate with you and for other legitimate purposes including improving our website.
- We only provide your personal data to the **third parties** set out in this privacy notice. We do not provide your personal data to third party advertisers.
- We store personal data for specified periods for our limited business purposes.
- You have certain rights, prescribed by law, in relation to the processing of your data, such as rights to request access and rectification of your personal data.

## 3. Changes to the privacy notice and your duty to inform us of changes

This version was last updated in January 2023.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### **Third party links**

This website 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 data about you. We do not control these third party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

### **The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- Identity Data includes first name, maiden name, last name, username or similar identifier.
- Contact Data includes email address, telephone number and postal address.
- Special Category Data includes your faith, ethnic background, health or disability issues where this is provided by you voluntarily.
- Account Data includes your call recordings, contract details, job details, unique customer identification.
- Financial Data includes your bank account details, payee name, payment card details and details of any payments made to you facilitated by us.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- Usage Data includes information about how you use our website.
- Marketing and Communications Data includes your preferences in receiving marketing from us and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

## **4. How is your personal data collected?**

We use different methods to collect data from and about you including through:

### **Direct interactions.**

You may give us your Identity Data, Contact Data, Special Category Data, Account Data and Financial Data in the course of us providing you services and by you filling in forms or by corresponding with us by post, phone, email or otherwise.

This includes personal data you provide when you:

- contact us through our websites, portals or on social media.
- give us some feedback (through a survey or other communication with us).
- apply for a property.
- request a service.

**Automated technologies or interactions.**

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our **Cookie Policy** for further details.

**Third Party sources or organisations.**

We may also collect or receive your personal data from third party sources or organisations such as:

- DIO, MOD stakeholders, third party repairs contractors, third party contractors (including payment software providers, banks), postal services, utilities providers, in connection with the services we provide.
- Government, ombudsman services, and regulators.
- Law enforcement agencies (such as the police) to identify and prevent fraud or crime.

**5. How we use your personal data?**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to comply with a legal or regulatory obligation.
- Where we need to perform our contract with the DIO by dealing with you or with a **third party** on your behalf.

We do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email. You have the right to withdraw consent to marketing at any time by contacting us.

**Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of Data	Lawful Basis for processing including basis of legitimate interest
To deliver the services required as part of our business and to communicate with you in relation to these services	Identity Data Contact Data Special Category Account Data Financial Data	Necessary for the performance of a contract  Necessary to comply with a legal obligation
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity Contact Technical	Necessary for the performance of our contract (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business organization or group restructuring exercise)  Necessary to comply with a legal obligation
To deliver relevant website content	Identity Contact Usage Marketing and Communications Technical	Necessary for the performance of our contract (to study how customers use our services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	Technical	Necessary for the performance of our contract (to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

- **Opting out**

You can ask us to stop sending you marketing messages at any time by contacting us at any time.

- **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts

of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our **Cookie Policy**.

- **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **6. Disclosures of your personal data**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 5 above:

- **Internal Third Parties** as set out in the *Glossary*.
- **External Third Parties** as set out in the *Glossary*.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **7. International transfers**

We do not transfer your personal data outside the European Economic Area (EEA).

## **8. Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other **third parties** who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will liaise with the DIO in accordance with the requirements of our contract. The DIO will notify you and any applicable regulator of a breach where it is legally required to do so.

## **9. Data retention**

**How long will you use my personal data for?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Our contract with the DIO will determine the appropriate retention period for personal data.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 10. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- Request access to your personal data.
- Request correction of your personal data.
- Right to withdraw consent in relation to marketing initiatives only.

If you wish to exercise any of the rights set out above, please contact us via: [dataprivacy@pinnacleservicefamilies.co.uk](mailto:dataprivacy@pinnacleservicefamilies.co.uk)

Alternatively, you can contact the DIO via: [CIO-DPA@mod.gov.uk](mailto:CIO-DPA@mod.gov.uk) OR [diordacn-secretariat@mod.gov.uk](mailto:diordacn-secretariat@mod.gov.uk)

### No fee required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). We may refuse to comply with your request if it is clearly unfounded, repetitive or excessive.

### What the DIO may need from you

The DIO may need to request specific information from you to help confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. The DIO may also contact you to ask you for further information in relation to your request to speed up our response.

### Time limit to respond

The DIO tries to respond to all legitimate requests within one month. Occasionally it may take longer than a month if your request is particularly complex or you have made a number of requests. In this case, the DIO will notify you and keep you updated.

## 11. Glossary

### LAWFUL BASIS

Performance of Contract means processing your data where it is necessary for the performance of our contract with the DIO.



Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

## THIRD PARTIES

### Internal Third Parties

Other companies in the Pinnacle Group acting as processors who provide central support services and undertake leadership reporting.

### External Third Parties

- Insurers for the purposes of obtaining and maintaining our insurance cover.
- Suppliers and sub-contractors in the course of providing our services to you.
- Service providers acting as processors based in the United Kingdom who provide IT and system administration services.
- Banking and/or payment software service providers enabling a payment to be made from or to you.
- Professional advisers acting as processors including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services in order to obtain professional advice in relation to our services and to manage legal claims and disputes.
- HM Revenue & Customs, regulators and other authorities (for example local authorities, benefits agency, social services, police) based in the United Kingdom who require reporting of processing activities in certain circumstances.

## YOUR LEGAL RIGHTS

You have the right to:

- **Request access to your personal data** (commonly known as a data subject access request). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction of the personal data** that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Withdraw consent at any time where we are relying on consent to process your personal data, i.e. in relation to marketing activities only.** However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

## Cookie Policy



Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

Currently we are only using essential cookies to allow you to experience the website fuller. These cookies are integral to the website platform and are UK GDPR compliant.

We use cookies to enhance customer experience but will always ask for your consent before using them while you are browsing our website.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We will use cookies that are required for the operation of our website and which 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 users are finding what they are looking for easily. Also, they may be used to track your return visits to the website. They include, for example, details such as your IP address, browser type, referring page and time of visit. If you sign up to receive our marketing communications your name and e-mail address will be stored on the server.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.