



Supportmatch Group GDPR, Privacy and Data Protection Policy

SUPPORT & MATCH CIC (Company No. 12623910) / SUPPORTMATCH HOMESHARE LIMITED (Company No. 10641187) |
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Approved by	Date approved	Last reviewed	Next review
Directors	June 2026	June 2026	June 2027

Who We Are and Data Controller Details

In this policy, “Supportmatch”, “we”, “us” and “our” refer to the Supportmatch Group companies involved in delivering our services, including **SUPPORT & MATCH CIC, Company No. 12623910**, and **SUPPORTMATCH HOMESHARE LIMITED, Company No. 10641187**. Depending on the service, enquiry or arrangement, one or both Supportmatch Group companies may act as the data controller. Where both companies jointly decide how and why personal data is used for Supportmatch services, they may act as joint controllers. Supportmatch has internal arrangements in place to manage data protection responsibilities, including responding to data protection requests, complaints, safeguarding concerns and personal data breaches. For all data protection enquiries, requests or complaints, please contact info@supportmatch.co.uk.

1. Purpose and Scope

Supportmatch Group is committed to protecting personal data and confidentiality. This policy explains how we collect, use, store, share and protect information relating to householders, homesharers, guardians, property owners, applicants, families, representatives, referees, emergency contacts, staff, volunteers, contractors and website users. It applies to our Homeshare, HomesharePlus, Property Guardianship, website, application, safeguarding, matching, monitoring and support services.

2. Information We Collect

- Identity and contact details: name, address, email, telephone number, date of birth, photo ID/passport details, emergency contacts.
- Application and suitability information: forms, interview notes, references, preferences, availability, property/household information, risk assessments and matching records.
- Sensitive information where necessary: health, disability, mental health, vulnerability, safeguarding concerns, care/support needs, incidents and complaints.
- DBS/criminal record information: DBS status, certificate number/date, level, outcome and suitability decision where required for safeguarding and suitability.
- Service and financial records: agreements, licence/service documents, invoices, payment records, arrears, refunds, correspondence, monitoring notes and complaints.
- Website and technical data: enquiry forms, chatbot information, cookies, IP address, analytics and website usage data.

3. Why We Use Personal Data

We use personal data to respond to enquiries, assess applications, carry out suitability checks, obtain references/DBS checks, arrange safe introductions and matches, prepare agreements, manage services, monitor arrangements, protect vulnerable adults, manage safeguarding concerns, deal with payments, complaints and disputes, comply with legal/accounting obligations, improve services and maintain appropriate records.

4. Lawful Basis

We only process personal data where we have a lawful basis. Depending on the situation, this may include:

- Contract or pre-contract steps: processing applications, agreements, fees and ongoing service arrangements.
- Legitimate interests: assessing suitability, making safe matches, communicating with service users, managing risk and keeping service records.
- Legal obligation: accounting, tax, safeguarding, court, regulatory or health and safety requirements.
- Vital interests: protecting someone’s life or physical safety in an emergency.
- Consent: marketing, testimonials, photographs, optional case studies and some non-essential cookies. Consent can be withdrawn.

5. Special Category, DBS and Safeguarding Data

Health, disability, mental health, vulnerability and safeguarding information is treated as special category data and is restricted to those who need it for safeguarding, suitability, risk assessment, service coordination or legal reasons. DBS and criminal offence information is handled separately and only processed where necessary, proportionate and lawful. We normally avoid keeping full DBS certificates longer than necessary and, where possible, record only the certificate number, date, level, outcome/status and suitability decision.

Where we process special category data, DBS information or criminal offence information, we will identify and record the appropriate lawful basis and any additional UK GDPR / Data Protection Act 2018 condition required. We will only process this information where it is necessary, proportionate and supported by appropriate safeguards, including restricted access, confidentiality controls, retention limits and secure deletion.

Where there is a safeguarding concern, risk of harm, emergency, legal duty or serious welfare concern, Supportmatch may share relevant information without consent where this is necessary, proportionate and lawful.

6. Sharing Information

We only share the minimum information necessary. We may share relevant information with householders, homesharers, guardians, property owners, families/authorised representatives, referees, DBS providers, councils, NHS, Adult Social Care, safeguarding bodies, emergency services, accountants, professional advisers, insurers, payment providers, CRM/email/cloud/website/form/chatbot/automation/accounting providers, regulators, courts or public authorities where necessary and lawful.

7. Security and Confidentiality

We protect personal data using appropriate measures including restricted access, password protection, multi-factor authentication where available, secure cloud storage, careful email checks, secure deletion, staff confidentiality expectations and restricted access to safeguarding, health, DBS and financial records. Personal data must not be shared through personal messaging apps, unsecured devices or with unauthorised people.

Supportmatch will record and investigate suspected personal data breaches, including accidental disclosure, lost information, unauthorised access, cyber incidents, wrongly sent emails or inappropriate sharing of personal data. Where a breach is likely to result in a risk to individuals' rights and freedoms, Supportmatch will report it to the Information Commissioner's Office without undue delay and, where required, within 72 hours of becoming aware of it. Where required by law, affected individuals will also be informed.

8. Retention

Record type	Usual retention
General enquiries not progressing	12–24 months
Unsuccessful applicant records	12–24 months unless safeguarding/legal reason to retain
Active and closed client/application/matching records	During service, then usually 6 years after relationship ends
Signed agreements/licences and financial records	Usually 6 years
Full DBS certificate copies	Avoid keeping; if kept, normally no longer than 6 months unless justified
DBS status/suitability decisions and safeguarding records	As long as necessary for safeguarding, audit, legal or risk reasons; reviewed case by case
Complaints, incidents, breaches and data requests	Usually 6 years, longer where serious safeguarding/legal risk exists
Website forms/cookies/analytics	As needed and in line with cookie/analytics settings

9. Your Rights

You have rights to be informed, access your data, correct inaccurate data, request deletion in some circumstances, restrict processing, object to some processing, withdraw consent where consent is used, request portability in some circumstances and complain about how your data has been handled. We may need to confirm identity before responding. Subject Access Requests are usually answered within one month unless the law allows more time.

10. Complaints and Data Protection Concerns

If you have a complaint about Supportmatch's service, including our Homeshare, HomesharePlus or Property Guardianship services, please raise it with Supportmatch first so that we can review, investigate and respond through our internal complaints procedure. For data protection complaints, please contact info@supportmatch.co.uk and include your name, contact details, what the complaint is about, relevant dates/documents and the outcome you are seeking. We will acknowledge data protection complaints within 30 days and respond without undue delay. You also have the right to complain to the Information Commissioner's Office about data protection matters.

Supportmatch is a member of the Homeshare Association and aims to work in line with recognised good practice standards in the Homeshare sector. The Homeshare Association is not our regulator and does not replace Supportmatch's own complaints process. However, if a complaint relates specifically to our Homeshare service and remains unresolved after our internal process, we may, where appropriate, seek guidance from or involve the Homeshare Association or another Homeshare Association member organisation to support transparency, fairness and good practice. This does not affect any safeguarding, legal, regulatory or ICO rights.

11. Cookies and Website Forms

Our website may use essential cookies and optional cookies or similar technologies, including analytics tools, chatbot tools, forms, pixels, tags or scripts, for website operation and service improvement. Optional cookies, analytics, chatbot tracking, advertising pixels or similar non-essential technologies should only be used where required consent has been given. Online forms should include a short privacy notice explaining that submitted information may be used for enquiries, applications, suitability checks, safeguarding, matching, agreements, support, payments and legal obligations.

12. Review and Approval

This policy will be reviewed at least every 12 months, or sooner if there are changes in law, ICO guidance, safeguarding requirements, Supportmatch services, website systems, data processing activities, or following a data breach, complaint or serious incident. Each review should record the date, responsible person, amendments and next review date. Where appropriate, Supportmatch will also review related internal data protection records, including the data retention schedule, data breach log, data protection complaints log and any relevant Data Protection Impact Assessments.

Short Notice for Application Forms

By submitting this form, you confirm that you understand Supportmatch will use the information provided to assess your enquiry or application, carry out suitability and safeguarding checks, arrange introductions where appropriate, prepare agreements, provide ongoing support, manage payments and comply with legal obligations. Some information may be sensitive, including health, disability, safeguarding, identity or DBS-related information. We will only collect, use and share information where necessary, proportionate and lawful. Please read our GDPR, Privacy and Data Protection Policy before submitting this form.