**Privacy Notice – First Homes**

This Privacy Notice explains how we use any personal information provided to the Housing and Environment service in respect of the ‘First Homes’ scheme. ‘First Homes’ scheme is a Government initiative to provide discounted homes which are a specific kind of discounted market sale housing for first time buyers who meet certain eligibility criteria.

**Purpose of our processing**

In order to verify whether you meet the eligibility criteria for one of the ‘First Homes’ provided within South Oxfordshire District Council (SODC) / Vale of White Horse District Council (VWHDC) areas and to secure a Section 106 (S106) agreement to legally record the terms of use.

**How we collect your data**

Personal data will have been provided to developers or estate agents and conveyancers by applicants for the First Homes scheme. The application will be initially made through the housebuilder who will check all information and determine if eligibility criteria are met. The form (but not the evidence) will be sent to the council for confirmation. The council will only request further evidence or data if there are any issues with the application.

Once an application is approved, the purchaser’s appointed conveyancer is then required to complete an undertaking (known as the “Solicitors Undertaking”), confirming purchaser compliance and property valuation. The undertaking will be submitted to the council for confirmation. Again, the council will only request further evidence or data if there are any issues with the undertaking.

Once approved, the purchase can progress to completion, upon which point the purchaser’s conveyancer will provide the council with a certificate of title to ensure a First Homes restriction has been registered.

We may also receive information directly from First Homes owners when the First Home is to be sold and in response to requests for feedback on the scheme.

**Lawful basis for processing personal data**

Article 6(1)(e) of the UK GDPR gives the council a lawful basis for collecting and using personal data in order to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.

The First Home scheme is a Government backed initiative with Local Eligibility Criteria set by the council and the discount, eligibility criteria and terms of use are secured by a section 106 agreement under the Town and Country Planning Act 1990.

If we seek your feedback on the scheme this will be provided with your consent so our lawful basis will be under Article6(a).

**What data do we collect?**

* First home applicant name(s)
* Proposed First Homes Owner name(s)
* Date of birth
* Current and proposed address
* Occupation
* E-mail address
* Contact telephone number
* Tenure of current home
* Household income
* Local connections to SODC/VOWH
* Confirmation of key worker, employer, job title/role (if applicable)
* Confirmation of armed forces, unit and job title/role (if applicable)
* Number of people expected to live in new household
* Whether you are a first-time buyer
* Financial information including confirmation of mortgage lending in principle, reservation fee paid, deposit amount, discounted property price, mortgage amount and lender
* Reference numbers including First Homes Application number, conveyancing reference, mortgage reference
* Title registration

We do not process any special category personal data or criminal offence related data.

**Who your data may be shared with**

The Housing and Environment service may need to share data within the council in order to secure and register the legal agreement for your First Homes scheme property. We may also share your information with your nominated conveyancer and Mortgage/Home purchase plan provider.

The Department for Levelling Up, Housing and Communities (DLUHC) may ask the council for data relating to the scheme which will be anonymous as far as possible.

Your data will be processed within the UK and we do not use any automated decision making when processing your data.

**Retention – How long do we keep your information?**

We will only keep as much personal data as we need for administering the First Homes Scheme. Because information will be needed at the point of sale we will keep records for the lifetime of the scheme, or until six years after you sell the property.

S106 legal agreements are retained in perpetuity.

Last amended date: 20 March 2024