

# Greenoak Housing Association Privacy Notice - Customers

## Who we are

This Privacy Notice is for customers of Greenoak Housing Association. It tells you how we collect and use personal information to carry out normal business activities as a UK charitable housing association.

Normal activities can be summarised as:

1. Providing social and other types of housing.
2. Property and grounds maintenance and repair, including adaptations.
3. Managing your housing, tenancy/lease and account as your landlord.

## Who we collect information on

We collect personal information about:

**Customers:** This includes current, former and potential customers, who live in our properties or access our services, and could also include their family and people associated with them. It also includes people who make a complaint or enquiry (where personal details are given).

**Employees:** This includes current, former and potential colleagues, as well as Board Members and apprentices (see separate Privacy Notice for employees).

## How we collect information about you

We collect information in a variety of ways, including:

- When customers apply for a home
- When customers sign a tenancy agreement
- Through on-going contact with customers during a tenancy
- When customers terminate a tenancy
- If a customer makes a complaint
- When dealing with ASB cases
- CCTV images (in Apollo Place)

When you apply to become a Greenoak Housing Association customer, we request and hold on file any references necessary to assess your application. This may include (but is not limited to), where appropriate, information from other landlords, the Police, the Probation Service, support services, Social Services, and health services.

## The information we collect

We hold personal data such as your household's names, dates of birth, contact details, national insurance number, and records of any transactions such as payments, complaints or requests for information. We also hold some sensitive personal data such as gender; ethnicity; and medical history where appropriate (for example if you have a Careline).

## How we use your information

We use the information we collect to deliver our services to you as required by the tenancy agreement we have with you. Further use of your data may be required where we have a legal requirement to do so, such as in response to a Court order. In some instances we may also require your explicit consent to use your data. We will ask you for this when we collect the data from you.

The length of time we hold your data for is outlined in our Record Retention Policy. Tenant's personal data, for the most part, is not held for longer than six years after the end of your tenancy. The basic history of who held a tenancy at which property and when, will be held forever. Please see our Record Retention Policy for further information.

We will use your data to:

- Manage allocations and lettings
- Manage tenancies
- Receive rent and service charges
- Provide a repairs and maintenance service
- Promote safety and the quiet enjoyment of our neighbourhoods & communities, including resolving disputes
- Investigate complaints
- Engage with you to make improvements to our products and services

We may need to use your personal data for legal reasons, such as:

- In response to a Court order
- A criminal offence has taken place

## **How we share your information**

In order to deliver our services to you, we may share your information with contractors or third parties and other agencies we work with. Your personal information will be kept secure and confidential and we share information as required by law.

We may share your data in the following instances:

- To enable our maintenance contractors to make appointments with you to carry out repairs and / or deliver services.
- Current or forwarding addresses may be shared with utility companies and Council Tax offices to ensure billing details are correct.
- If you default upon any tenancy/licence conditions, information about you may be provided to authorised debt recovery agencies, to enable them to recover the debt. This may affect future applications for tenancies, credit and insurance.
- We may discuss your financial situation, rent payments (including any arrears) and any claims made for welfare benefits with; an external debt advice agency, Welfare rights advisor, Citizens Advice Bureau (C.A.B.), the housing benefit department, or the local authority's housing advice and homeless prevention team to make sure that benefits are paid correctly.
- All customer names, addresses and rent amounts are shared at the end of each year with local authority benefits teams to help claims for housing benefits and changes to housing benefits happen more quickly and easily for everyone. All customers are included as we do not always have records of who receives benefit, due to direct payment.

Examples of further organisations we may share your information with, where appropriate, are:

- Courts
- Police
- Local authorities
- Social Services
- Support agencies
- Health services
- Other housing associations / housing providers
- Fire Service

## **Sensitive personal information**

Under the GDPR certain personal information is classified as sensitive. Sensitive data is information relating to physical or mental health, sex life, religious or philosophical beliefs, political opinions, membership of a Trade Union, genetics and biometrics. We minimise our holding and use of sensitive categories of personal information but, given the services we provide, there are times when we use it, for example when providing accommodation for disabled persons or those with problems around substance abuse, or when helping someone to access care services.

NB Sensitive personal information is classified as Special Category Data in the GDPR.

## **Children's information**

We do not normally hold children's information as part of a tenancy, as all tenants are adults. However, we record children's basic information if they are resident in one of our properties, including their name and date of birth. This is required for checking the property is not overcrowded and to assess other tenancy management issues where all householders and ages are required to be known. We may receive children's information if we are involved in the housing and tenancy aspects of a welfare case as part of a multi-agency working solution.

## **Your right to access your information**

You can find out if we hold any personal information about you by making a 'subject access request'. You can request to see any of the information that we may hold about you, including CCTV images, but the more specific you can be about what you require, the quicker we can respond to your request. If we do hold information about you we will tell you what this is and let you have a copy of it. We do not charge for a first request, but may make a small charge towards our administration costs for repetitive or excessive requests. Where requests are particularly excessive, or persistent, we may refuse to respond.

You can ask for your information by writing to us, or emailing us at [admin@greenoakha.org](mailto:admin@greenoakha.org). We will require proof of your identity before we disclose information to you.

When we receive your valid request – with proof of id/address - we will respond and provide your information within one month at the latest. In some instances we may extend the response time up to a further two months where requests are complex or numerous.

If you are requesting CCTV footage of yourself, please specify the time, date and location of the footage, and supply a clear photograph so that we can find you on the footage, please note CCTV footage is overwritten every 10 days .

Please be aware that we may need to edit some information out, if it relates to other people, as we must protect the privacy rights of all individuals.

You can find more information about your rights to access your information [here](#).

## **Further rights**

You have a number of rights with regards to the use of your personal data.

You have the right to ask us to correct personal data we hold about you if it is incorrect.

If you believe that the information we hold on you is incorrect then you should notify us and we will arrange to have the information corrected within one month of you telling us. We will also tell anyone else who we have provided this information to.

You also have the right to have a copy of any information that you have provided to us in order to provide that information to another housing association or agency

You have the right to ask us to stop using certain personal data about you in some circumstances. You also have the right to ask us to erase your personal data in certain circumstances, especially if it is no longer being used, or if you withdraw consent if you have previously given. Both of these rights apply where we do not have a legal, contractual or compelling legitimate interest to keep or use your personal data.

If you choose to withdraw your consent where you have previously given it, it may affect the service that we are able to provide you.

You can find more information about your rights on the [Information Commissioners' website](#).

## **How we keep your information secure**

We are committed to ensuring that your information is kept secure. You can find out more by looking at our Data Protection Policy. We have also developed a separate ICT policy which sets out how we keep the information held on our systems secure. We also have a number of physical security measures in place, such as office security and confidential destruction of all waste paper.

## **What we will not do**

We will not send you unsolicited marketing material. We will not sell your personal data on to third parties. We will not pass on your personal data to unrelated third parties unless we are allowed or required to do so by law or we have your explicit permission to do that. We will not transfer or store your personal data outside of Europe (the European Economic Area) outside of the control of the UK / European regulations.

## **Changes to our privacy notice**

We keep our privacy notice under regular review and will place any updates on this webpage. The notice was last reviewed in April 2018.

## **Links to other websites**

This notice is limited to this website only. If you follow a link to an external site, we recommend that you check the privacy notice of the site before giving any personal details.

## **How to contact us**

We welcome any queries you may have regarding this Privacy Notice, or any information we hold about you. Please contact us at [admin@greenoakha.org](mailto:admin@greenoakha.org)

## **Additional information**

We are a Registered Social Landlord (RSL) regulated by the Homes and Communities Agency (HCA). We are registered with the Information Commissioner's Office as a Data Controller under the General Data Protection Regulations 2018.