HACKNEY HOUSING COOPERATIVE (LANDLORD) AND COOP HOMES (MANAGING AGENT)

Customer Privacy Notice - How we use your personal information.

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Who we are

To operate as a housing business, Hackney Housing Cooperative and our managing agent Coop Homes must get, process and store personal information about our applicants for housing, tenants, and customers necessary to deliver the housing service.

HHC is run by a Management Committee that employs an administrator and contracts Coop Homes as managing agents. Coop Homes gets, processes and stores personal information about our applicants for housing, tenants, and customers necessary to deliver the housing service. The Management Committee of Hackey Housing Cooperative and its employee get, process and store limited personal information about our applicants for housing, tenants, and customers, only as strictly necessary to fulfil the role of the Management Committee.

This Privacy Notice supports HHC's and Coop Homes' respective data protection policies. It explains how HHC and Coop Homes treat your personal details.

Our Privacy Promise We promise:

- To keep your data safe and secure
- Treat any data concerns you may have as priority

What is the purpose of this notice?

This privacy notice aims to give you information on how we - HHC and Coop Homes - collect and process your personal information throughout your tenancy with us. It makes you aware of how and why your personal information will be used, and how long it will usually be retained for. It provides you with certain information that must be provided under the UK General Data Protection Regulation ('the UK GDPR'), the Data Protection Act 2018 and any subsequent legislation.

This notice primarily covers how we use information relating to our customers. It makes you aware of how and why your personal information will be used, namely for the purposes of managing your tenancy agreement, and how long we will usually keep your personal information for. In these cases, HHC and Coop Homes are "joint data controllers" for the purposes of data protection law.

What information we collect about you and the legal basis

What information we collect, why we collect it, the legal basis for doing so, and how long we keep it for			
What	**Why**	**Basis**	**Retention**
Contact information • Name • Date of birth • Previous address • IP (Internal Protocol) address • Telephone numbers • Email address Supporting documents that may also contain photographs of you and any joint applicants.	Your tenancy agreement is a contract between you, any other person in your household (should you hold a joint tenancy) and your landlord. This data is used to set up and maintain your tenancy account with us. To help us prevent tenancy fraud	B	Life of tenancy + 6 years after tenancy ends
• National insurance number • Financial information	To assess your benefit entitlement and council tax. To help prevent tenancy fraud	F	NI number – life of tenancy/ Financial information 6 months
• Details of any support needs you have • Details of those people providing additional support • Next of kin details/emergency contacts • Disability information	As required by our regulator and to provide information on extra services we provide – such as tenancy support.	F	Life of tenancy + 6 years after tenancy ends
Authority to Act or Power of attorney	We use this information to ensure we deal with the most appropriate person dealing with your affairs.	F	Life of tenancy but regularly reviewed and 6 years after tenancy ends
References from previous landlords	We use this information to decide if we can should grant	F	Deleted after 1 year

	you a tenancy and to provide you with support		of tenancy being granted
Proof of right to rent	To assess your entitlement to rent	C	Life of tenancy
• Ethnicity • Religion • Sexuality	For analysis purposes, as required by our regulator and to provide information on extra services we provide.	A	Destroyed after data is recorded
Details of who is living with you	Used to ensure you are not overcrowded or under-occupying a property	B	Life of tenancy but regularly reviewed
Children's personal data	We do not usually process data on children aged under 18 that live in our properties, as all our 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 also 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	B	Life of tenancy but regularly reviewed
Closed Circuit Television (CCTV)	Some of our locations and offices may have Closed Circuit Television (CCTV) and you may be recorded when you visit them. CCTV is used to provide security and protect both our visitors and communities. CCTV will only be viewed when necessary (e.g., to detect or prevent crime) and footage is stored for set period of time after which it is recorded over. HHC and Coop Home comply	F	CCTV recordings will be retained for 30days and deleted within one week thereafter

	with the Information Commissioner's Office CCTV Code of Practice, and we put up notices, so you know when CCTV is used.		
Types of Legal Basis (Personal Data)			
A – Consent; B – Contract C; – Legal obligation; D – Vital interests; E – Public task; F – Legitimate interest			

What particularly sensitive information we collect about you

What information we collect, why we collect it, the legal basis for doing so, and how long for			
What	**Why**	**Basis**	**Retention**
Details of unspent convictions/ criminal offences attracting a custodial sentence/on a register/person of interest	To ensure that we house you appropriately. To ensure that specialised support can be offered where required.	B	Life of tenancy but regularly reviewed. If no issues when conviction spent data will be deleted after 1 year following suspension
Health information obtained via the nominations process and throughout the course of a tenancy	As required by our regulator/the Tenancy Standard, in compliance with our obligations under the Housing Act 1996, in accordance with our legal obligations under the Equality Act 2010 and to provide information on extra services we provide – such as tenancy support	B	Life of tenancy but regularly reviewed
Ethnicity Religion Sexuality	For monitoring and analysis purposes as required by our regulator, for compliance with the Equality Act 2010 and to provide information on extra services we provide	A	Life of tenancy + 6 years after tenancy ends
Types of Legal Basis (Special Category Data)			
A – Consent; B – Substantial public interest (Clause 6 and 16 of Part 2 of Schedule 1 of the DPA 2018); C – Vital interests; D – In the public domain; E – For legal claims; F – Public interest			

There may will be times where HHC or Coop Homes are processing special category personal data under a different lawful basis. The other lawful basis that HHC and Coop Homes are likely to occasionally rely on in the context of special category processing are:

a) Protection of vital interests (Article 9(2)(c) UK GDPR);
b) The establishment, exercise or defence of legal claims (Article 9(2)(f) UK GDPR);
c) Substantial public interest in safeguarding of children and individuals at risk (Part 2, s.18 DPA 2018);
d) Substantial public interest in safeguarding of economic well-being of certain individuals (Part 2, s.19 DPA 2018);
e) Substantial public interest in disclosure to elected representatives (Part 2, s.24 DPA 2018); f. Substantial public interest in preventing or detecting unlawful acts (Part 2, s.10 DPA 2018); and g. Substantial public interest in equality of opportunity or treatment (Part 2, s.8 DPA 2018).

Purposes for which we use your personal information

The usual situations in which we will process your personal information are listed below:

- To register you as a customer.
- To communicate with you about your tenancy.
- To administer our waiting lists.
- To administer housing and property grants.
- To perform our contract or service to you.
- To manage our relationship with you, including notifying your about changes to our contract or services or asking you to provide us with feedback.
- To administer and protect the organisation.
- To protect the organisation from tenancy fraud.
- To comply with any legal or regulatory obligation
- To maintain our accounts and records.
- To support and manage our employees, agents, and contractors.
- As part of our marketing and promotional activities (if you agree).

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

We do not use automated decision making or profiling however there may be occasions where inadvertently we identify special category information about you. For example, your ethnicity, religion, sexual orientation, or disability may be evident from:

- Photographs
- Video footage
- Face to face meetings
- Statements you provide to us
- Declaration of Interests
- Social media.

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

How we manage your personal information

We process your personal information in accordance with the principles of UK GDPR.

We will treat your personal information fairly and lawfully and we will ensure that information is:

Processed for limited purposes;

- Kept up-to-date, accurate, relevant and not excessive;
- Not kept longer than is necessary;
- Kept secure.

Access to personal information is restricted to authorised individuals on a strictly need to know basis.

We are committed to keeping your personal details up to date, and we encourage you to inform us about any changes needed to ensure your details are accurate.

To help us to ensure confidentiality of your personal information we may ask you security questions to confirm your identity when you call us.

Sharing your information

Personal information we have on you is used to make sure the services we offer continue to be the most appropriate for you.

We will use your information to manage our relationship with you for example keeping our records up to date and to enable us to assist in the coordination of support services.

We will also use your information to carry out the contractual obligations we have to our customers for example arranging repairs, planned maintenance, surveys and inspections to the properties.

We will not normally share your information with anyone else. However, there are certain circumstances where we will be required to share your information with other organizations. We will comply with Data Protection law when disclosing this information. Where it is lawful in accordance with Data Protection law, we may share information with the following non exhaustive entities:

Third parties under the provisions of Crime and Disorder Act.

- Housing Benefits department.
- Collection agencies and legal representatives for the purpose of collecting rents or other monies owed to us.
- Regulatory authorities in response to formal requests.
- Repairs contractors and service providers.
- Financial organisations.
- Central government.
- Our auditors.
- Survey and research organisations.
- Other housing associations, trusts or local authorities.
- Health authorities.
- Security organisations.
- Health and social welfare organisations.
- Professional advisers and consultants.
- Regulators or funders.
- Probation services.
- Police forces.
- Courts and tribunals.
- Professional bodies.
- Insurers.
- The press and the media. Or
- In response to legislative or court orders

We share your information with the Central Government and our Regulator as required by law. The continuous recording of lettings and sales in social housing in England (referred to as CORE) is a national information source that records information on the characteristics of both private registered providers and local authority new social housing tenants and the homes they rent.

This collection provides all of the statistical information that the Ministry of Housing, Communities and Local Government produces on social housing lettings and includes:

- Trends in social housing lettings over time
- Characteristics of tenants with new social housing lettings

- Types of tenancy agreements

How do we keep information secure?

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

All personal information you provide to us is stored on our secure servers within the UK. However, there may be occasions where your information may need to be stored in or sent to companies, service providers, agents, subcontractors, and regulatory authorities in countries outside of the European Economic Area ('EEA') which may not have the same level of security and protection as we have under UK legislation. If we have to do this, we will make sure that suitable security measures are in place.

We have put in place procedures to deal with any suspected data security breach and will notify you and the Information Commissioner's Office of a suspected breach where we are legally required to do so.

Marketing

From time to time, we would like to send you information about services of ours and our partner agencies where we feel this may be of interest to you.

Where you consent to receive marketing information, should you change your mind you have the right at any time to stop us using your information for marketing use by withdrawing your consent. Consent can be withdrawn by contacting us at homes@coophomes.coop.

Access to and correction of the information we hold on you.

You can find out if we hold any personal information about you by making a 'subject access request' under data protection laws. If we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding it
- Tell you who it has been disclosed to; and
- Let you have a copy of the information in an intelligible form.

You may also have the right for your personal information to be transmitted electronically to other organisations in certain circumstances.

You can access your personal information we hold by writing to us at the following address or by informing us verbally. Post: Coop Homes, 8 Waldegrave Road, Teddington Middlesex T11 8GT

Email: homes@coophomes.coop

You have the right to question any information we have about you that you think is wrong or incomplete. Please contact us if you want to do this. If you do, we will take reasonable steps to check its accuracy and correct it.

Your rights

You may also have the right, in certain circumstances, to request that we delete your personal information, to block any further processing of your personal information or to object to the processing or sharing of your personal information. There are some specific circumstances where these rights do not apply, and we can refuse to deal with your request.

If we are processing your personal information based upon your consent (e.g., as part of our marketing or promotional activities or to make a voluntary referral to an external agency), you have the right to withdraw your consent at any time.

If you require any further information about your right to rectification, erasure, restriction of or object to processing or you wish to withdraw your consent please contact us (see How to contact us below).

Complaints

We take any complaints we receive about the collection and use of personal information very seriously. We will encourage you to bring it to our attention if you think that our collection or use of information is unfair, misleading, or inappropriate. You can make a complaint at any time by contacting us (see How to contact us below).

How to contact us

Please contact us if you have any questions about our privacy policy or the information we hold about you. You can do so via one of the contact details below;

Email – homes@coophomes.coop

Write to us – Governance Team, 8 Waldegrave Road, Teddington, Middlesex TW11 8GT.

Alternatively, if you think our collection or use of personal information is unfair, misleading, or inappropriate or if you have concerns about the security of your personal information, you also have the right to make a complaint to the Information Commissioner's Office. You can contact the Information Commissioner's Office at the following address:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Further information and guidance please visit https://ico.org.uk/concerns/.

Our Privacy Notice will be regularly reviewed, and it may change at any time in the future, we encourage you to check this Privacy Notice whenever you visit our website.