

## Selig Suffolk Hope into Action

### Data Privacy Notice for Tenants

#### Personal data

Your privacy is important to us. This privacy notice is provided by Selig Suffolk Hope into Action (HIA) and references to 'we,' 'our' and 'us' are references to HIA.

We are a controller of your personal data under applicable data protection laws, including the General Data Protection Regulation (GDPR). As a controller, we determine why and how we collect and use your personal data.

In the process of becoming a tenant of HIA and during your tenancy we will keep some data about you. This is "personal data," because it is about you, and it can be linked to you.

#### What personal data do we hold?

We will record your name, address and email address, phone number, next of kin, emergency contact, personal finance, benefits, and passport number.

We will also record any debt, housing history, offending history and relevant personal matters and history. We will also record date of birth, gender, and disability if you have provided this.

We will keep records on employment and training opportunities, meaningful use of time and social interaction. We will keep records of periodic assessments, action plans, outcomes, support notes and other notes and records. Where we use CCTV or other recording systems at any of our locations or houses we may also gather your personal data in the form of images, video footage and sound recordings that is taken. We may also collect information about criminal convictions and offences.

At all times we will do all we can to keep your data safe, accurate and updated, but we will not check whether the personal data you give us is correct. Please tell us if your personal data changes while you are working with us. We are not responsible if you provide us with personal information that is not correct.

#### Special category data

We will record and process some personal data about you which is special category data. This includes information about your medication, drug abuse, physical and mental health, medical history, ethnicity, religion, and sexual orientation.

#### How do we obtain your personal data?

This is how we get your personal information:

**Directly from you**, either in person, via email, by phone, by CCTV or other recording systems, website cookies, and server logs. This includes personal information you provide when you use any of our services or contact us.

**Indirectly** from other third parties when:

- you are referred to us by someone such as the council. This may include special categories of data.
- we liaise with your workplace, health professional or benefit provider.
- we liaise with your family.
- we deal with experts (including medical professionals such as psychiatrists) and other service providers about services you have received or are receiving from us.
- we liaise with county courts in respect of small claims involving you.
- we liaise with debt collection agencies.
- You use social media platforms (such as Facebook, Twitter, and Instagram) for example where you share our content through social media, for example by liking us on Facebook, following or tweeting about us on Twitter.
- publicly available sources.

### **What is your data used for?**

We use personal information:

- For risk assessments of potential tenants
- For the wellbeing of tenants
- To link you up with appropriate services
- For the Health and Safety of tenants
- To ensure tenants receive their benefits
- To administer HIA's business such as collecting rent and personal charges
- To ensure the safety of staff, volunteers, neighbours, and other tenants
- To comply with any legal obligation
- For our learning and development of the organisation

We also use data such as statistics – this is known as “Aggregated Data.” Aggregated Data may be derived from your personal data but does not directly or indirectly reveal your identity.

### **Does HIA have a right to your data?**

When “processing” your personal information (this is the legal terminology and means using your personal data) we must have a legal justification for doing so. The justification depends on how we want to use your personal information.

Where we state below that we are relying on our legal interests to use your personal information, we will only do so in a way which does not affect your privacy rights. Where we use your special category data, we need to have additional legal justification to do so.

We have set out the general legal bases together with any additional special condition we are relying on below for each anticipated use of your personal data.

- To register you as a tenant so that you can use our services
- To communicate with you about your services
- For administration purposes
- For the operation of our business including protection from fraud
- For audit purposes
- To comply with our own legal and regulatory obligations

### **Special Category Data**

We need this so that we can keep you safe and well. It is in your interest for us to do this. We check that the processing of your special category data will not cause you harm.

### **Do you have to agree to our use of it?**

It is your choice whether to give us personal information so that we can provide our services. If you do not provide certain personal information (such as personal details), we may be unable to provide all or some of our services. You can choose to withdraw your consent at any time by contacting staff.

### **Sharing your data**

We share some of your data with the volunteers from the church that partners your home. We may also share relevant data with other agencies providing you with a service or support.

We may also share some of your personal data with: our external professional advisers such as accountants, bankers, insurers, auditors and lawyers; law enforcement agencies, courts or other relevant party, to the extent necessary for the establishment, exercise or defence of legal rights and third parties which are considering or have decided to acquire some or all of our assets or shares, merge with us or to whom we may transfer our business (including in the event of a reorganisation, dissolution or liquidation).

We will not share your data with any other third party without your consent, unless there is a legal requirement such as where reporting to the Police a criminal activity or a safeguarding of children or adults at risk issue or other safety issues where liaison with Police or next of kin or other appropriate person would be required.

We would also share data with relevant authorities and appropriate people where it is necessary to establish or verify any relevant evidence for the purposes outlined in this Privacy Notice.

Where we retain the services of a third-party provider, data may also be shared in compliance with our own security standards, policies, and procedures.

### **How long will your data be kept?**

Our relationship with our tenants goes beyond the original term of the tenancy so considering any legal, accounting, reporting and regulatory obligations, we will keep the data whilst it is necessary to maintain that relationship and beyond that, to safeguard our legal interests.

Refused applicants' data will be destroyed after six months.

### **How is your personal data kept safe?**

We keep personal information secure with appropriate measures in place to protect against the loss, misuse, and alteration of personal information, however, the transmission of data across the internet is not completely secure. We cannot guarantee that loss, misuse, or alteration of data will not occur whilst data is being transferred.

We ensure that access to personal data is restricted only to those members of staff or volunteers whose job roles require such access and that suitable training is provided.

The originals of your forms, or a photocopy, are kept online in secure cloud-based storage. A login account with password is required to access data held on our computer system.

### **What rights do you have?**

You have a number of rights under Data Protection legislation:

#### **1. Right to know what data we hold**

You have a right to know what personal data we hold about you. This Data Privacy Statement describes the data that we will hold. But you can ask if we have any other data about you which is not covered by this Data Privacy Statement.

#### **2. Right to have a copy of the data we hold**

If you would like a copy of your Personal Information, please contact us at the address given in the 'Contact us' section. Please provide us with sufficient information to verify your identity. Please also help us to respond quickly by indicating why you think we hold Personal Information about you and what information you think we may hold. Sometimes there may be a reason why access will not be possible. If that is the case, you will be told why. We will respond promptly and within one month of receiving all necessary information.

### **3. Right to object**

You can object if you think we are using your data in the wrong way. You can also object if you think we do not have “lawful grounds” for using your data. We shall no longer process your personal information unless we can demonstrate compelling legitimate grounds.

We will give you a statement explaining why we use your data and explaining the “lawful grounds.” If you are still not happy, you can complain to the Information Commissioner’s Office. If we find we are using your data in the wrong way, we will stop immediately and stop it happening again.

### **4. Right to have your data corrected or deleted.**

If you think there is a mistake in your data, or there is no longer justification for us to hold it, please contact us at the address given in the ‘Contact us’ section or [info@hopeintoaction.org.uk](mailto:info@hopeintoaction.org.uk). You have a right to have your data held correctly; we may need to check what is the correct data, but we will put right any mistakes as soon as possible.

### **5. Right to be forgotten**

We promise to remove your data when it is no longer reasonably required which will be a significant period of time following the end of the termination of the Licence Agreement to protect the long-term interests of the parties and to avoid any risk of any legal claim against either party.

Finally, if anything happened to your data that could be a risk to you, we would do our best to tell you.

### **Contact us**

To make enquiries in relation to this privacy notice, exercise any of the above rights, or to make a complaint about our use of your personal information, please write to us at 1 Civic Drive, Ipswich, IP1 2AR. If you are not satisfied with the way we deal with your complaint, you have the right to refer it to the Information Commissioner’s Office without first referring it to us.

### **Changes to this privacy statement**

We keep our privacy notice under regular review and we reserve the right to change this statement from time to time. If changed we will post a new notice on this page. This notice was last updated on 9<sup>th</sup> January 2019.