

Freebridge Community Housing

Privacy Notice for Non Freebridge Tenant Anti-Social Behaviour Service Customers

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Freebridge Community Housing

Privacy Notice for Non Freebridge Tenant Anti-Social Behaviour Service Customers

Our Privacy Notice describes the categories of personal data we process and for what purposes. We are committed to collecting and using such data fairly and in accordance with the requirements of the General Data Protection Regulation (GDPR) and Data Protection Act 2018.

1. Introduction

- 1.1 We take your privacy seriously and you can find out more here about your privacy rights and how we collect, use, share and secure your personal identifiable information. This includes the personal identifiable information we already hold about you now and the further personal identifiable information we might collect about you, either from you or from a third party. How we use your personal identifiable information will depend on the services we provide to you.
- 1.2 This Privacy Notice is a public document available when Freebridge Community Housing (Freebridge) obtain and use your personal identifiable information. It explains how we and appointed third party organisations/people use your personal identifiable information and it details your rights. We obtain your personal identifiable information in order to conduct our normal business operations as a registered social housing provider.
- 1.3 Our Data Protection Officer (DPO) provides help and guidance to make sure we apply the law to the processing and protection of your personal identifiable information.

Should you have any questions about how we use your personal identifiable information, our DPO can be reached by writing to us and addressing your letter to:

Data Protection Officer,
Freebridge Community Housing,
Juniper House,
Austin Street,
Kings Lynn,
Norfolk PE30 1DZ; or

Email us at DataProtectionOfficer@freebridge.org.uk

- 1.4 Please also refer to Your Privacy Rights (section 3) for more information about your rights and how our DPO can help you.
- 1.5 This Privacy Notice provides up to date information about how we use your personal identifiable information and updates any previous information we have published/supplied about using your personal identifiable information. If we make any significant changes affecting how we use your personal identifiable information, we will make changes to this Privacy Notice, and we will contact you to inform you of these changes.

2. Who We Are

- 2.1 Where we refer to 'we' or 'us' in this Privacy Notice, we are referring to Freebridge.

2.2 Freebridge is the 'data controller' of your personal identifiable information because we determine the use of this information. As a registered social housing provider, we are regulated by the Regulator of Social Housing.

3. Your Privacy Rights

3.1 You have eight rights relating to the use and storage of your personal identifiable information. These are:

- The right to be informed.
- The right of access.
- The right to rectification.
- The right to erasure.
- The right to restrict processing.
- The right to data portability.
- The right to object.
- Rights in relation to automated decision making and profiling.

3.2 In brief, you have the right to be informed who is obtaining and using your personal identifiable information, how this information will be retained, shared and secured and what lawful grounds will be used to obtain and use your personal identifiable information. You have the right to object to how we use your personal identifiable information in certain circumstances. You also have the right to obtain a copy of the personal identifiable information we hold about you.

3.3 In addition, you can ask Freebridge to correct inaccuracies, delete or restrict personal identifiable information or to ask for some of your personal identifiable information to be provided to someone else. You can make a complaint if you feel Freebridge is using your personal identifiable information unlawfully and/or holding inaccurate, inadequate or irrelevant personal identifiable information which if used may have a detrimental impact on you and/or has an impact on your rights.

3.4 You also have the right to complain to the Information Commissioner's Office, the UK supervisory authority, about our collection and use of your personal data. They can be contacted at:

Information Commissioner's Office,
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire, SK9 5AF
<https://ico.org.uk>.

3.5 To make enquires for further information about exercising any of your rights in this Privacy Notice, please contact Freebridge's DPO - please also refer to Section 1 above.

4. What Kinds of Personal Identifiable Information We Use

4.1 We will collect, store, and use the following categories of personal information about you:

4.2 Personal Information

- Contact details such as name, address & property type, email, home and mobile telephone numbers;
- Age – date of birth;
- Your chosen or preferred first language, to enable us to communicate appropriately with you;
- Online computer identification (IP Address) – information recorded when you engage with us by email

4.3 Special Information

- Health – optional, to provide support and assess risk to vulnerable customers
- Race – optional, to support Norfolk Constabulary's 'Stop Hate In Norfolk' Protocol, tackling hate incidents and crime across Norfolk
- Ethnic origin – optional, to support Norfolk Constabulary's 'Stop Hate In Norfolk' Protocol, tackling hate incidents and crime across Norfolk
- Religion – optional, to support Norfolk Constabulary's 'Stop Hate In Norfolk' Protocol, tackling hate incidents and crime across Norfolk
- Sexual life or sexual orientation – optional, to support Norfolk Constabulary's 'Stop Hate In Norfolk' Protocol, tackling hate incidents and crime across Norfolk

There are other types of special information which we do not collect, but are deemed important under the law:

- Trade Union membership;
- Genetics;
- Biometrics (where used for ID purposes).

5. How we Gather your Personal Identifiable Information

5.1 We obtain personal identifiable information by various means, this can be by face to face, by email, telephone, correspondence and/or by receiving information from others, for example: a local elected member who is representing you, local council, police, health or social care agencies. We can also receive information about you from other people who know you and/or are linked to you, for example: relative, person nominated to act on your behalf or your legal representative.

5.2 Some further examples of how we may gather your personal identifiable information are set out below:

- Directly from you, for example: when we carry out Anti-Social Behaviour Interviews with you either over the phone, in our offices, or in your home; and
- From other people who know you including people you are linked to or live in the same community as you with regard to reports of anti-social behaviour; and
- From monitoring or recording calls as part of our quality and complaints monitoring arrangements. We record these calls for training and to ensure the safety of our staff; and
- From our office based CCTV systems for the prevention and detection of crime or to detect damage/vandalism to our properties and to ensure the safety and security of our staff and individuals obtaining services from us.

6. How We Lawfully Use Your Personal Information

6.1 We only use your personal identifiable information where that is permitted by laws that protect your privacy rights. This will be where:

- We need to use the information to comply with our legal obligations;
- We need to report or share information with agencies where you or another person is homeless or is at risk of becoming homeless within the next 56 days;
- We need to use the information to provide you with a service i.e. resolution of anti-social behaviour or neighbour nuisance issues; and/or
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- Where we need to seek your consent (if consent is needed).

6.2 Special protection is given to certain kinds of personal information that is particularly sensitive. This is information about your health status, racial or ethnic origin, political views, religious or similar beliefs, sex life or sexual orientation, genetic or biometric identifiers, trade union membership or criminal convictions or allegations. We will only use this kind of personal information where:

- We have a legal obligation to do so (for example where you or another person is at risk of physical, mental or sexual harm or damage);
- It is necessary for us to do so to protect your vital interests (for example where you or another person is in need of being protected as a vulnerable person from significant harm or serious exploitation);
- It is in the substantial public interest;
- It is necessary for the prevention or detection of crime
- It is necessary for insurance purposes; or
- You have specifically given us 'affirmative' consent to use the information.

6.3 Where we have your consent, you have the right to withdraw it. See Section 13 for how to withdraw consent.

6.4 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.

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

7. Automated Decision Making

7.1 We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

8. Sharing Your Personal Identifiable Information with Others

8.1 We will share personal identifiable information within Freebridge and with others outside Freebridge where we need to do that to make our services available to you, and to meet or enforce a legal obligation where it is fair and reasonable for us to do so. Please also see

section 6: How We Lawfully Use Your Personal Information, for more information.

- 8.2 In providing you with a service in relation to Anti-Social and Nuisance Behaviour, we are most likely to share your information with statutory organisations such as the Local Council, The Police and Social Services, and HM Courts & Tribunal Services when taking legal enforcement.
- 8.3 Others outside of Freebridge who we may share your personal identifiable information with includes third party service providers (our IT software providers and other contractors and designated agents such as our mediation providers), as well as other entities within our group.
- 8.4 All our third party service providers are required to take appropriate security measures to protect your personal information in line with our Data Protection policy. We do not allow our third party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.
- 8.5 We may share your personal information with other third parties, for example in the context of the possible restructuring of our business, or to share your personal information with a regulator or auditor, or to otherwise comply with our regulation requirements or the law.
- 8.6 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 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.
- 8.7 We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

9. Transferring Information Outside Of The EU

- 9.1 We do not transfer your information outside the UK.

10. How Long We Keep Your Personal Information For

- 10.1 We will only retain your personal identifiable information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting as required by law or regulatory purposes. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether can achieve those purposes through other means, and the applicable legal requirements.
- 10.2 In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

11. Your Online Activities

- 11.1 We use cookies on our website to assist with language selection and user preferences. We do not track your use of our Freebridge website.

12. Rights of Access, Correction, Erasure and Restriction

12.1 It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during the time we are providing you with a service.

12.2 Under certain circumstances, by law you have the right to:

- **Request access** to your personal information commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

12.3 If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the DPO in writing.

12.4 You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

12.5 We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

13. Right to Withdraw Consent

13.1 In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the DPO. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or

purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

14. Changes To This Privacy Notice

- 14.1 We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.