

Freebridge Community Housing

Privacy Notice for Tenants

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Freebridge Community Housing

Privacy Notice for Tenants

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 use a variety of personal identifiable information depending on the services we deliver to you. For all our services, we need to use the following information about you and any occupant of your home:

4.2 Personal Information

- Contact details - name, address, email, home and mobile telephone numbers;
- Age – date of birth;
- Identification - information to allow us to check your identity;
- Credit information – information about your credit history;
- Photograph – information to record your identity;
- Online computer identification (IP address) – information recorded when you engage with us by email;
- National Insurance numbers – information to carry out functions such as universal credit and/or supporting people contracts;
- Next of kin.

There are other types of personal information which we do not collect for the occupants of your property unless they have a direct relationship with us (e.g. applied for housing in their own right or obtain services from us directly):

- Telephone contact details.
- Photograph.

4.3 Special Information

- Health - to support our housing functions and vulnerable customers;
- Race - to support our equality monitoring as part of the Ministry of Housing, Communities & Local Government's (MHCLG) online data collection system for social housing lettings and sales;
- Ethnic origin - to support our equality monitoring purposes as part of the MHCLG's online data collection system for social housing lettings and sales;
- Religion – optional, and solely to support our equality monitoring purposes;
- Sexual life or sexual orientation – optional, and solely to support our equality monitoring purposes;
- Convictions – to prevent and detect crime, fraud, anti-money laundering and to aid in the prosecution and rehabilitation of offenders.

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).

4.4 Sometimes where we ask for your personal identifiable information to enter into a contract/agreement with you (for example: tenancy agreement, lease, housing application, shared ownership, right to buy, support and/or care plan agreement) or to meet our legal or regulatory duties (for example: to process housing applications, council tax benefit, equality

monitoring and/or government or housing regulator reports), we will not be able to provide some of our housing, support or products or services without this information.

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, benefit 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 you fill out an application, transfer or mutual exchange form or as part of your right to buy application;
- By observing how you use our housing, support, products and services, for example: from the transactions and operation of your accounts and/or on-line services;
- From other organisations such as Homechoice, former housing, support and advocacy providers, health and social care agencies, law enforcement agencies, debt collectors, energy or utility companies, benefit agencies and/or credit reference and fraud prevention agencies;
- From other people who know you including joint account holders and 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. We will not record any payment card details as part of our accounts and payments operations;
- 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 To provide you with our housing services we have a legal duty to confirm a person(s) has the right to reside in the country. We will need to obtain your name, contact details, date of birth, your current and previous countries of residence/citizenship, and a copy of identification documents (such as passport, home office residence papers and driving licence).

6.2 We may also need health and social care information (such as physical, social or mental health information or medication) to help support our customers who have a vulnerability and/or receive a support or care service from us.

6.3 We sometimes need to gather, use and share your personal identifiable information for particular reasons, which are set out in more detail below:

To operate and administer our housing, support and care products and services, including managing and responding to complaints:

a)	Contact and occupation information with third parties who help us deliver our repairs, support, care and housing services. For example our repairs contractors and their appointed sub-contractors.
b)	Communicate with you, for example by our Streets Ahead newsletter, about products and services we are delivering using any contact details you have given us as part of your contract and/or tenancy agreement - or for example by post, email, text message, social media, and notifications on our website. You may unsubscribe at any time (please also refer to section 12).
c)	Communicate with you in addressing and/or responding to complaints. For example with the Housing Ombudsman and elected representatives (local and parliamentary).
d)	Contact and respond to utilities providers and agents acting on their behalf who are looking to reconcile gas/electricity accounts of previous and current tenants.
e)	Contact information with third parties who undertake market research on our behalf to enable service delivery improvements.

We use your personal identifiable information in this way because it is necessary to meet the conditions set out in the contract or tenancy agreement with you and/or to meet our legal or regulatory obligations.

To administer payments to and from your accounts or other agencies (e.g. benefits agency, payment agencies):

a)	Contact, and financial information with benefit agencies and financial advisors who as agencies or financial organisations/institutions help us to process payments to your account(s).
b)	To prevent financial crime including money laundering, benefit fraud or illegal subletting.

We use your personal identifiable information in this way because it is necessary to meet the conditions set out in the contract/agreement with you and/or to meet our legal and regulatory obligations.

To carry out our duties under health and safety and to support our vulnerable people;

a)	Indicators with contractors and sub-contractors to ensure services are tailored to meet your needs.
b)	Indicators with contractors and sub-contractors to ensure health and safety measures are in place. We would have informed you of this indicator and when it will be applied and for how long, for example: An indicator will be applied when an incident has occurred which results in a threat being made by you to a member of staff or contractor team.
c)	Tracking the location of our employees whilst visiting you – this is to ensure their personal safety and security.

We use your personal and special identifiable information in this way because it is necessary to meet the conditions set out to meet our legal and regulatory obligations in relation to health and safety.

To report or share information with agencies where it is believed you or another person's vital interests are at risk:

a)	Where you or another person is at risk of physical, mental or sexual harm or damage.
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b)	Where you or another person is in need of being protected as a vulnerable person from significant harm or serious exploitation.
c)	Where you or another person is homeless or is at risk of becoming homeless within the next 56 days.

We use your personal and special identifiable information in this way because it is necessary to meet our legal and regulatory obligations and to protect yours and others' vital interests.

To carry out our lettings and home ownership affordability assessments and former debt decisions about you:

a)	Information you give to us about your former addresses will be used to carry out a credit history check with approved suppliers.
b)	Information about those you are linked with in the proposed agreement or contract with us, for example, a joint tenant or owner.
c)	Information about how you or the person linked to you has former debts owing to us or other landlords.

For these purposes, we share and receive information with and from banks, building societies, credit reference and fraud prevention agencies. The credit or fraud prevention agency might add details of our search to the records they hold about you, whether or not your engagement with us proceeds. The use of your information is based on our legal obligations.

To comply with standard-setting agencies and auditors:

a)	Those who audit our accounts and/or compliance with our processes and regulatory standards or good practice will see your data as is necessary for the audit.
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7. Automated Decision Making

7.1 Sometimes we may use your personal identifiable information in automated processes to make decisions about you, such as credit scoring. We would only do this to help ensure decisions are made accurately, fairly and efficiently and to offer you services tailored to you.

8. Our Legal Basis for Using Your Personal Identifiable Information

8.1 We only use your personal identifiable information where that is permitted by the 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 use the information to perform a contract with you; and/or
- It is fair to use the personal identifiable information either in our interests or someone else's interests, where there is no disadvantage to you – this can include where it is in our interests to contact you about products or services, market to you, or collaborate with others to improve our services;
- Where we need to seek your consent (if consent is needed).

8.2 Where we have your consent, you have the right to withdraw it. We will let you know how to do that at the time we gather your consent.

See section 12: Keeping You Up to Date, (clause 12.2) for details about how to withdraw your consent to marketing.

8.3 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 to protect vulnerable people);
- It is necessary for us to do so to protect your vital interests (for example if you have a severe and immediate medical need whilst on our premises);
- 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.

9. Sharing Your Personal Identifiable Information With or Getting Your Personal Identifiable Information from Others

9.1 We will share personal identifiable information within Freebridge and with others outside Freebridge where we need to do that to make our products and services available to you, inform you of our products and services, 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.

9.2 Who we share your personal identifiable information with depends on the products and services we provide to you and the purposes for which we use your personal identifiable information. For most products and services we will share your personal identifiable information with our own service providers such as our IT Suppliers, with credit reference agencies and fraud prevention agencies. (Please also see section 6: How We Lawfully Use Your Personal Information, for more information on who we share your personal identifiable information with and why).

9.3 Most of the time the personal identifiable information we have about you is information you have given to us, or gathered by us in the course of providing products and services to you. We also sometimes gather personal information from and send personal information to third parties where necessary for credit checking and fraud prevention or marketing/newsletter information purposes, for example so you can receive information from us about our services and events. (Please also see section 6: How We Lawfully Use Your Personal Information, for more information on who we share your personal identifiable information with and why).

10. Transfers Outside the UK

10.1 We do not normally transfer your information outside the UK. There may be some occasions when your information leaves the UK because a third party has servers outside the UK; on such occasions, we will take steps to ensure that your information is processed securely.

11. How Long We Keep Your Personal Information For

- 11.1 How long we keep your personal information for depends on the services we deliver to you. We will never retain your personal identifiable information for any longer than is necessary for the purposes for which we need to use it or as required by law or regulatory purposes.

12. Keeping You Up To Date

- 12.1 We will communicate with you about products and services we are delivering using any contact details you have given us as part of your contract and/or tenancy agreement - or for example by post, email, text message, social media, and notifications on our website.
- 12.2 Where you have given us consent to receive marketing, you can withdraw that consent and update your marketing preferences by contacting us directly on enquiries@freebridge.org.uk

13. Your Online Activities

- 13.1 We use cookies on our website to assist with language selection, user preferences and tenant log in access. We do not track your use of our Freebridge website.