



# Privacy Policy

Version	2.0
Approved Date	August 2023
Approved By	Birnbeck Committee
Document Owner	Jody Bulman
Review Date	August 2026

## 1. Policy Statement

- 1.1 The purpose of this policy is to provide information as to how we collect your personal information, what information we collect and why and our legal justification for doing so, how we protect your information and the rights you have regarding the information we hold about you.
- 1.2 Your privacy and information is important to us and we are committed to holding your personal data respectfully, securely and in accordance with Data Protection Law.

## 2. Scope of Policy

- 2.1 This policy applies to all members of staff and contractors when processing the personal data of residents.

## 3. Legislation

- 3.1 There are a number of legislations that apply to health and safety, these are:
  - General Data Protection Regulation 2018
  - Data Protection Act 2018
  - Privacy and Electronic Communications Regulations 2003

## 4. Definitions

- 4.1 Personal data is any data that relates to an individual where they can be identified from that data.
- 4.2 The processing of data includes the collection, storage, use, recording, disclosure or destruction of personal data.

## 5. What information we collect from you

- 5.1 The type of information we will collect from you is information such as name, address, contact details, date of birth, National Insurance number, bank details, financial information, relationship status, employment details, family details,



income and expenditure details, identification documents, details about your home and housing need, photos, CCTV footage, references.

- 5.2 We also collect special category personal data such as health information, race/ethnicity, religious beliefs, sexual orientation, accessibility information and other personal information about your circumstances if relevant.

## **6. How we collect your information**

- 6.1 We mainly collect the information we hold directly from you; however, we may also collect information from local councils, previous landlord's, Police, health professionals, support agencies, care agencies and Social Services.

## **7. How we store your information**

- 7.1 The information we collect will be stored on our computer systems and/ or a paper file. The information is held securely using a range of controls to ensure that information is kept secure from improper use, unauthorised access, unauthorised modification, unlawful destruction or accidental loss. All information is stored in accordance with GDPR.

- 7.2 We will treat your information fairly and lawfully. We will ensure that information is:

- Kept secure
- Keep up to date, accurate and relevant
- Processed for a specific purpose
- Not kept for longer than necessary

- 7.3 If a personal data breach occurs, we will notify you no later than 72 hours after discovering that a breach has occurred.

## **8. Why we collect your information**

- 8.1 We will only collect personal information where we have a legitimate interest and that is appropriate for us to be able to deliver services to you and to manage our business.

## **9. Sharing your information**

- 9.1 We will not share your personal information with anyone other than you unless you have given us prior authorisation to do this with the exception of for a legitimate business reason, doing so is authorised by legislation or if it is necessary to comply with a legal obligation.

- 9.2 A legitimate business reason may include sharing information with organisations that work with us or on behalf of us, such as maintenance contractors, local authority teams, another landlord and utility companies.



## **10. How long we hold personal information**

10.1 We will retain data in line with legislative requirements and statutory obligations. Wherever possible we will destroy / delete personal data when we no longer need it or no longer have a legitimate interest in keeping it.

## **11. Sending information overseas**

11.1 Our business is conducted solely in the United Kingdom. We will not send your personal information overseas unless you have specifically asked us to send information to an overseas address.

## **12. Residents' rights regarding personal information**

12.1 You have a right to refuse to provide us with information if you deem the request to be inappropriate, however it is important to note that if you refuse to provide information in certain circumstances that it may inhibit our ability to deliver services to you, including processing housing applications to help find a property to suit your needs.

12.2 You can request to receive a copy of the personal information that we hold on you. We will respond to all requests with all of the information that we are legally required to provide within once month of receipt of the request.

12.3 You can update, correct or inform us about inaccurate information we hold on you.

12.4 You have the right to withdraw your consent, request that we restrict, delete or do not process your data. However, we can override this if there is a legal and legitimate reason for holding the data.

## **13. Your right to complain**

13.1 If you believe that we not have not processed your personal data in accordance with the law, you can make a complaint to the Information Commissioner's Office (ICO).