

PRIVACY INFORMATION FOR CHS **TENANTS AND SHARED OWNERS**

The General Data Protection Regulation

CHS is committed to protecting your personal data. This privacy notice sets out how your personal data will be collected and processed in relation to your tenancy or shared ownership lease. It is available on the CHS website, or you may request a copy from CHS. We have a separate privacy notice covering your use of our online services e.g. website, customer portal. Please note that this privacy notice will be regularly reviewed and may be updated from time to time.

What information do we collect?

The information we collect and hold for you and members of your household may include:

- Names, Address, dates of birth, contact details, gender, ethnic origin, national insurance number, health or disability issues;
- Records of transactions such as payments or requests for information;
- Any other information which you provide;
- Relevant information provided by third parties e.g. contractors, newbuild developers, statutory agencies, agencies handling your application to become a tenant or shared owner, former landlords providing a reference.

We collect this information through:

- Forms you complete e.g. when applying for housing or when your tenancy begins
- Forms you submit in the shared ownership sales process
- Information you provide about yourself when you get in touch with CHS e.g. about changes to your household
- Records of the payments you make
Information provided by third parties may be verbal or in writing

Why do we process personal data?

We require this information to provide you with the services you require and to keep in touch with you. We also use the information for:

- Assessing applications for housing to start a new tenancy;
- Answering your queries - we hold records of our contact with you and contact with third parties about you;
- Improving service delivery and making sure our services are accessible, e.g. taking into account health or support needs;
- Providing you with relevant news and information
- Monitoring whether our services are fair and consistent

We collect this information for 'the performance of a contract' which is a lawful basis under GDPR. Without this information we will be unable to accept an application for services. We store the data obtained on our Housing System (QL) and on paper records.

In addition to the information used for 'the performance of a contract' as described above, we also process your personal data for 'Legitimate Interests' in order to send you information and monitor our services.

The following conditions will also apply for the processing of sensitive personal data:

- explicit consent from the customer (where information is provided voluntarily)

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- requiring it to protect substantial public interest

Who has access to the data?

We may share data between relevant CHS departments so that you can access the full range of services you require. The information you supply will be kept securely and in accordance with our document retention policy. In the course of dealing with your enquiry we may need to pass your details on to one of our contractors or partner organisations, which provide services on our behalf (such as property maintenance or courier services). This will be limited to only the information that they require to provide the service. These third parties are also required to keep your personal information in accordance with Data Protection legislation. We will not pass on your personal details for commercial purposes.

We reserve the right to access and disclose individually identifiable information to comply with applicable laws and lawful government requests, to operate our systems properly or to protect ourselves and our users. In order to assist in the prevention and detection of fraud your personal information may be used for the purpose of data matching by the CHS Group and other public bodies under the National Fraud Initiative. We may also use it for prevention and detection of fraud.

How do we protect your data?

We take data security very seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties. Your data may be held securely in electronic and/or manual records. All of our staff receive data protection training and are made aware of how data should be handled and stored in accordance with data protection legislation. Where appropriate, IT systems have restricted access arrangements in place to ensure that only authorised staff have access to your data.

For how long do we keep your data?

We will keep your personal data within our secure Housing system as a current or former tenant. When you are no longer a tenant or shared owner with CHS, we will destroy or archive paper records in line with our document retention policy which has various timescales depending on the content.

If you apply to [purchase your home](#), application data gathered during the process will be removed from all emails and hard copy files once completion has taken place or if your application is unsuccessful. They will only be held on our encrypted internal network with restricted access for authorised staff only. Please note, your application information will be held for approximately a 5 year period. The data will be removed during the month of January each year when it is at least 5 years old. This means if your sale completes in May 2018, the data will be removed completely in January 2021.

What are your rights?

Even if we already hold your personal data, you still have various rights under Data Protection legislation. We will seek to deal with your request without undue delay and in

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accordance with any legislative requirements. We may keep a record of your communication to help us resolve any issues or requests that you raise.

- Right to object – if we are using data because we deem it necessary for our legitimate reasons to do so and you do not agree, you have the right to object. You also have the right to object to being subject to automated decision making, including profiling and direct marketing.
- Right to withdraw consent – where we have obtained your consent to process personal data for certain activities (including marketing), you may withdraw your consent and request that your personal data be deleted at any time.
- Right to access (subject access request) – you have the right to ask us to confirm what information we hold about you at any time and may ask us to modify or update such information. We may ask you to verify your identity, provide more information and/or where legally permitted decline your request and explain why.
- Right to erasure – in the following circumstances, you have the right to request that your personal data be erased: if the data is no longer necessary for the original purposes it was collected or processed, it has been processed unlawfully, it should be deleted due to a legal obligation or you object to processing and there is no overriding legitimate interest for us to continue processing. We may only decline your request if certain limited conditions apply.
- Right to portability – you have the right to ask us to transfer your data to another data controller.
- Right to block or restrict processing whilst the organisation considers your requests exercised under data protection legislation.

If you would like to exercise any of these rights, please e-mail data.protection@chsgroup.org.uk or write to the Housing Team, Endurance House, Vision Park, Chivers Way, Histon, Cambridgeshire, CB24 9ZR.

If you remain dissatisfied then you have the right to complain directly to the Information Commissioner (www.ico.org.uk/concerns)

What if you do not provide personal data?

If you do not provide the personal data required we may not be able to assess your application; answer your queries or respond to your enquiry.

Contact details of the Data Controller

The Head of Housing Management is the Data Controller on behalf of the CHS Group.

Contact details of the Data Protection Officer

CHS Group has a Data Protection Officer who can be contacted by e-mailing data.protection@chsgroup.org.uk or writing to our offices at Endurance House (at the address given above).