

# Privacy and Data Protection Statement

## Privacy Notice and Data Protection

Equity Housing Group Limited (EHG) & Johnnie Johnson Housing are committed to protecting the personal information we hold about you. This privacy notice explains when and why we collect personal information, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

We manage personal information in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

## Who manages your data?

Our Privacy Notice applies to all the personal data Equity Housing Group Limited (EHG) & Johnnie Johnson Housing (JJH) collects and uses.

References in this privacy notice to “we”, “us” and “our” collectively includes EHG and JJH.

## How do we collect your information?

We collect information from you via a variety of sources, including when you apply for one of our properties or services, complete one of our forms, when you call, write, e-mail or meet with us, or respond to a survey. We collect information when you use our website or self-service portal.

As part of our commitment to providing the best possible service to our customers we may record telephone calls made to our Customer Solutions Teams and other customer teams to ensure we've not missed any important information you have provided, and to ensure we have an accurate record of your call, which may be needed to support any transactions that take place over the phone or if there is a dispute. We do not record card details for any financial transactions.

To help deter crime and help the police to identify individuals involved in criminal activity we operate CCTV systems at some of our schemes which collect images and are used in accordance with our CCTV policies and procedures.

We may take photographs at our events, at our properties and in our communities to use for general communications and publicity. We will only take and use photographs of you with your explicit consent.

We may receive personal information about you from third parties including:

- Your council or benefits office relating to your housing
- Prior landlords and credit agencies when you apply for housing
- Police, welfare or support organisations dealing with you
- Solicitors, welfare officers or other representatives acting on your behalf/instruction
- Financial institutions when you apply for our services

## What personal data do we collect about you?

When we talk about “personal data” in the context of this privacy notice and data protection, we mean information which relates to you as an individual and which allows us to identify you directly or indirectly by combining with other information we may hold.

The personal data that we require from you when taking out a tenancy includes:

- Full name and proof of your identity / photo ID
- Date of birth
- National Insurance number
- Contact details, including phone, e-mail and correspondence address
- Details of anyone authorised to act on your behalf
- Name and date of birth of other members of the household
- Bank and debit/credit card details
- Identity photo
- Other personal information that will vary on a case by case basis to help us resolve breach of tenancy, alleged anti-social behaviour or fraud

For our supplementary services we may collect more sensitive information, this includes:

- Race, ethnicity, nationality, sexuality and disability information to make sure the services we provide meet the needs of our diverse customer groups and help to highlight any additional service opportunities.
- Financial information to help us to provide welfare and benefits advice to you to help you budget and pay your bills.
- Health information when we need this to support adaptations to be made to the property you are living in or because you need additional support.
- Particular needs or preferences so that services can be better tailored to your requirements.

We do not normally process children's information as part of a tenancy, as all our customers are adults. However, we record children's basic information if they are resident in one of our properties, including their name and date of birth. This is required for checking the property is not overcrowded or under-utilised, and to comply with legislation.

We may receive children's information if we are involved in the housing and tenancy aspects of a welfare case as part of a multi-agency working solution.

To help you buy part or the whole of your home we perform affordability and credit checks. When processing a house sale or purchase we need to collect photo IDs, bank statements, payslips, and income details for you to support the transaction and to comply with anti-money laundering regulations.

## How is your information used?

The personal information about you is used to manage your tenancy or other contracts you may have with us. The performance of a contract is usually the legal basis we use for processing your information and carrying out our ongoing core activities.

The processing activities we conduct under this contract include:

- Managing your account charges and payments, including arrears;
- Managing any repairs, maintenance and adaptations to your property;

- Ensuring tenancy conditions are complied with, such as dealing with anti-social behaviour or fraud; and
- Complying with relevant legislation and regulations.

We conduct customer surveys periodically relating to our services in order to gauge satisfaction and make improvements based on feedback.

We will only discuss or communicate your tenancy details with those named on the agreement or those authorised by you in writing for specific reasons.

We undertake a range of added value activities such as organising community events, providing debt advice, adapting the property you live in, providing services at your request, including skills training and every day support services, selling properties and gathering information to improve our services.

We may use the data you have provided to analyse our customer base and make sure the services we are providing meet the needs of our diverse customer groups.

For services where additional personal information is needed, we will always notify you in advance about the service being offered, the type of personal information needed, the reasons why and obtain your explicit consent to proceed, usually by way of a sign up / consent form for that service.

## **Security of your information**

We operate a range of information and communications systems and technologies for efficient operation of the business. Personal information is held on these systems which are maintained to achieve a high level of confidentiality, integrity and availability including following best practice information security standards.

We hold personal information in our IT systems for backup, archiving and disaster recovery purposes. Any manual records are securely stored at our sites or at our off site archiving facility. We will not transfer or store your personal data outside of the control of the UK/European Union unless there are adequate safeguards in place.

## **How we will communicate with you**

We need to communicate with our customers and this will be in writing, by telephone, or by electronic means such as email or text. We are moving many of our services online as this is usually more convenient for you and more efficient for us.

We like to keep in touch with our customers, so we can better understand your needs, to invite you to events, and tell you about changes at Equity Housing Group and Johnnie Johnson Housing. We are required by our regulator to keep our customers informed and to offer opportunities for involvement, but you may opt-out of receiving this by contacting [customersolutions@equityhousing.co.uk](mailto:customersolutions@equityhousing.co.uk) or [dataprotection@jjhousing.co.uk](mailto:dataprotection@jjhousing.co.uk).

## **Marketing**

We operate a positive opt-in consent mechanism for receiving direct marketing. We will always give you the option to remove your consent to receive direct marketing when we contact you. Or you can request to be removed by emailing us at [customersolutions@equityhousing.co.uk](mailto:customersolutions@equityhousing.co.uk) or [dataprotection@jjhousing.co.uk](mailto:dataprotection@jjhousing.co.uk).

## **Who receives your information?**

### **Third Party Service Providers working on our behalf**

We share limited personal information with our contractors who are carrying out services on our behalf. Our contractors are required to comply with the data protection and other relevant legislation as well as our own Data Sharing Agreement to ensure your personal information is managed appropriately and for specified purposes.

### **Other Third Parties**

We may need to share information with solicitors, agents, mortgage brokers, financial advisors and surveyors relating to a property sale.

In some cases we may have a duty to disclose your information by law with local authorities and agencies, the police, utility companies or other public bodies.

## **How long will we hold your information?**

All personal information will be retained in accordance with our data retention schedule.

Personal information relating to your tenancy agreement will be kept for as long as the agreement is active or where money is owed on the account. The basic history of who held a tenancy at which property and when will be held permanently on our systems.

## **We will never**

Send you unsolicited marketing material or sell your personal information on to third parties.

Use social media to collect personal information as we cannot control how these online services may decide use or share your data.

Pass on your personal information to unrelated third parties unless we are allowed or required to do so by law or we have your explicit permission to do that.

Share your personal information with anyone who claims to represent you unless we have your positive consent to do so or they act in some recognised official capacity.

Use your information for a reason other than that it was collected for without telling you first and explaining why.

## **What are your rights?**

You have the right to request a copy of the information we hold about you. Please contact [dataprivacy@equityhousing.co.uk](mailto:dataprivacy@equityhousing.co.uk) if you wish to request access to your personal data. We will respond within 30 days of receiving your request provided we have all the details we need to find the information we hold about you. It will always help to be specific about what personal data you want to see, what it relates to and within what timeframe, as that will assist our search.

The accuracy of your information is important to us. We're working on ways to make it easier for you to review and correct the information that we hold about you through our online services. If you change your email address or phone number, or if you think any of the information we hold is inaccurate or out of date, please advise us of any corrections by contacting Equity Housing Group via email [customersolutions@equityhousing.co.uk](mailto:customersolutions@equityhousing.co.uk) or Johnnie Johnson Housing via email [dataprotection@jjhousing.co.uk](mailto:dataprotection@jjhousing.co.uk).

You may withdraw your consent to use any information that was previously provided to us by getting your consent. Please email us if you wish to withdraw any consent previously given to [customersolutions@equityhousing.co.uk](mailto:customersolutions@equityhousing.co.uk) or [dataprotection@jjhousing.co.uk](mailto:dataprotection@jjhousing.co.uk). 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 or because it is necessary for the purposes of delivering our contractual relationship with you.

You also have other rights which can be seen by visiting the Information Commissioner's Office (ICO) website and reading about Data Protection law at <https://ico.org.uk>.

## **Further Information and Complaints**

Please contact us if you have any queries about the personal information we hold and how we use it. Please email [customersolutions@equityhousing.co.uk](mailto:customersolutions@equityhousing.co.uk) or [dataprotection@jjhousing.co.uk](mailto:dataprotection@jjhousing.co.uk).

If we fail to resolve your personal data query after contacting us, you can approach the Information Commissioner's Office for further advice at <https://ico.org.uk>

## **Review of this notice**

We keep this privacy notice under regular review, and this notice was last updated on 5 June 2019.