

Harrogate Housing Association

Privacy notice (25 May 2018)

We are committed to protecting and respecting the privacy and security of your personal information. In broad terms personal information means data or information which enables you to be identified.

This privacy notice describes how we use the personal information we collect about you or that you provide to us. Be assured we will never sell or disclose your personal information for marketing purposes.

Who we are

We are Harrogate Housing Association Limited, 10 High Street, Harrogate, HG2 7HY and are registered with charitable status under the Cooperative and Community Benefit Societies Act (2014).

For our customers/potential customers we hold your personal information as a Data Controller. For the customers and tenants of Applegarth Homes, Rogers Almshouses, Harrogate Flower Fund Homes and the Avondale Hostel we are a data processor. This notice applies equally to the personal information we hold as a data controller and that that we hold as a data processor.

Our promise

When collecting, holding or using your personal information we promise to:

- hold your personal information on your behalf, and respect that responsibility
- only collect and hold the personal information we need for the specified purpose
- only retain your personal information for as long as we need to
- be open and transparent with you about how we will use your personal data and who we will share it with
- make sure effective safeguards and systems are in place to keep your personal information safe and secure
- make it easy for you to access and correct your personal information through our local office
- make sure all employees handling your personal information have appropriate training and guidance and have processes in place to monitor identify and deal with misuse
- act in compliance with the principles of the General Data Protection Regulation (GDPR)

Why do we collect and hold personal information

We primarily collect and hold your personal information in order to be able to manage effectively a contractual relationship (your tenancy/licence) you have or may have in the future. In other cases the information is held and processed for legitimate business purposes or those of third parties or to protect your vital interests.

What information do we collect and how do we get it

We obtain personal information about you, like your name, address, e mail address and telephone number in a variety of ways including:

- from forms you fill in and give to us
- from telephone conversations (we will always tell you if we are recording a telephone call)
- from meetings we have with you
- from e mails you send us
- from forms you complete on our website
- from third parties, eg one of our contractors.

The information we collect may also include information about other people who live with you or can be contacted in case of emergency. It is your responsibility to ensure you have their permission to give us their information.

We also collect CCTV images at some of our properties for public safety and for the prevention and detection of crime. Images collected are only used for this purpose.

If you visit our website for general public access then we will not store or capture personal information about you. Our website though does use “cookies” to distinguish you from other users of our site – please refer to the separate cookie policy.

When you visit our website we will also collect technical information about your visit including the IP address used to connect your computer to the internet. We may also collect information on the pages you visited and how long you viewed them. We will only use this information to produce statistics on the performance of our website. The information will be stored securely by our website suppliers Ascensor and will not be made publicly available.

How we use your personal information

We will use your personal information as follows:

- to manage/perform our mutual obligations under your tenancy or licence, eg collect your rent/service charges or maintenance charge
- to deliver the services you request, eg repairs
- to monitor and improve the services we deliver
- to allow us to communicate effectively with you
- to ensure your well being and that of those who live with you or close by
- to improve our understanding of your requirements
- to process financial transactions
- to carry out enforcement functions
- to prevent and detect fraud and corruption
- for the reason it was collected

Your information will always be used in line with our legal obligations.

We will not use your personal information for automated decision making.

Harrogate Housing Association

Privacy notice (25 May 2018)

Sharing your information

We may disclose your personal information to others, but only where this is necessary, either to comply with our legal obligations, for the performance of our contractual obligations or as permitted under the GDPR.

We share your contact information, name, address, telephone number and any other specific contact information you give us, with our repairs contractors so as to enable them to make appointments with you to undertake the necessary work.

We also share your information with Housing Benefit and Universal Credit to enable the smooth processing of claims and payments of rent.

We will not pass your personal information to external organisations for marketing or sales purposes or for any commercial use.

Protecting your personal information

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. We limit access to your personal information to those who have a business need to know with the minimal amount of information being disclosed as is possible in order for the business to be undertaken.

Where personal information is disclosed to others, eg a repairs contractor, they will only process it on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any actual or suspected data security breach and will notify you and the Information Commissioners Office as required under the GDPR.

The transmission of information via the internet and e mail is not completely secure and therefore it is advised that as little personal information as possible is communicated in this way. Communicating with us in this way is done so at your own risk.

How long will we keep your personal information

We will only keep your personal 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 requirements.

We aim to follow the retention periods set out in the "Document Retention for Housing Associations" publication from the National Housing Federation.

As a guide records regarding your tenancy/licence are retained for six years after your tenancy has ended.

Your obligations

It is important that the personal information we hold about you is accurate and current. This can only be achieved with your help. Please keep us informed if your personal information, eg mobile telephone number, changes.

Your rights in connection with personal information

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

- Request access to your personal information.
- Request correction of the personal information that we hold about you.
- Request erasure of your personal information.
- Object to processing of your personal information.
- Request the restriction of processing of your personal information.
- Request the transfer of your personal information to another party.
- Withdraw your consent to the processing of your data.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal information, or request that we transfer a copy of your personal information to another party then please contact us by e mail or in writing.

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.

You should also be aware that it may not always be possible to meet your request. This is usually where your request conflicts with our legal obligations, contractual commitments or other legitimate business interests. If we are unable to deal with your request we will let you know.

If you exercise your rights we may request information to prove your identity to ensure you have the rights to access the information. This is part of the security measures we have in place.

You also have the right to complain, at any time, to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. Details of how to complain can be found on their website www.ico.org.uk or by telephoning 0303 123 1113.

Changes to this privacy notice

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.

An up to date copy of this notice is on our website www.hhal.org.uk.