

SIX TOWN HOUSING PRIVACY NOTICE (TENANTS)

What is the purpose of this privacy notice:

Six Town Housing is an Arm's Length Management Organisation who manage the Council Housing Stock on behalf of Bury Council. Six Town Housing is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. You are being sent a copy of this privacy notice because you are a tenant of a property we manage. It makes you aware of how and why your personal information will be used, namely for the purposes of managing your tenancy agreement, and how long we will usually keep your personal information for. It provides you with certain information that must be provided under the General Data Protection Regulation (EU) 2016/679 ('the GDPR') and the Data Protection Act 2018 ('DPA').

The types of personal information we collect and store:

In connection with your tenancy agreement for a property we manage, we will collect, store, and use the following types of personal information about you:

- Personal details such as your name, date of birth, National Insurance number, identification documents, photographs, contact details and contact preferences;
- Information you have provided in your application for housing, including references, pre-tenancy assessments, housing history and income details;
- The details of other individuals living with you;
- Financial details including bank details, benefit support, rent account details and income and expenditure assessments;
- Complaints of anti-social behaviour;
- Complaints about our services;
- Repair logs;
- Details of any support received by you including care packages and plans and details of support providers; and
- CCTV images.

We will also collect, store and use the following types "special categories" of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation, trade union membership and political opinions;
- Information about your health, including any physical and/or mental health condition and disabilities;
- Information about criminal convictions, criminal offences or court proceedings.

How we collect tenant information:

We collect, store and hold personal information relating to tenants in our properties from the following sources:

- You, the tenant;
- Bury Council;
- Your previous landlord;
- Your named referees; and
- Other agencies such as the police, emergency services, probation, other RPs, the NHS, health professionals, drug and alcohol services and charities.

How we use tenant information:

We use this personal information to carry out our duties to manage your property. This includes:

- Communicating with you about your tenancy;
- Letting, renting and leasing properties;
- Administering waiting lists;
- Carrying out research;
- Administering housing and property grants;
- Providing associated welfare services, advice and support;
- Maintaining our accounts and records;
- Carry out improvement works as part of a planned programme;
- To take payments for any service charges and other non-rent activities;
- To deliver repairs and other works to your home and any communal areas;
- To deal with anti-social behavior complaints;
- To contact you to seek feedback on services provided to you and your contract with us;
- To take any action on a breach of tenancy;
- To recover any debt owed to us;
- To process any application from you to exercise your Right to Buy or your Right to Acquire;
- Using any CCTV information for the purposes of public safety and the prevention and investigation of crime (including fly-tipping);
- Where we have your consent, which you can withdraw at any time, we may use your image in publicity material;
- Supporting and managing our employees, agents, and contractors; and
- As part of our marketing and promotional activities (if you agree).

The legal basis' we rely on for processing personal information in this way are as follows:

- Consent has been obtained;
- Processing is necessary for the performance of a contract;
- Processing is necessary for compliance with a legal obligation; or
- Processing is necessary for our legitimate interests.

What happens if you fail to provide personal information:

Failure to provide the personal information requested may result in applications for housing being refused.

Automated Decision Making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

How we share tenant information:

We will not normally share your information with anyone else. However, there a certain circumstances where we will be required to share your information with other organisations and will comply with the GDPR and the DPA when disclosing this information. Where it is required or necessary in accordance with the GDPR and/or the DPA, we may share information with:

- Family, associates and representatives of the person whose personal data we are processing;
- Educators and examining bodies;
- Suppliers and service providers;
- Financial organisations;
- Central government;
- The Ministry for Housing, Communities and Local Government;
- Auditors;
- Survey and research organisations;
- Other housing associations, trusts or local authorities;
- Trade unions and associations;
- Health authorities;
- Enquirers and complainants;
- Security organisations;
- Health and social welfare organisations;
- Professional advisers and consultants;
- Homes England;
- Probation services;
- Charities and voluntary organisations;
- Police forces;
- Courts and tribunals;
- Professional bodies;
- Insurers;
- Employment and recruitment agencies;
- Credit reference agencies;
- Debt collection agencies;
- Landlords;
- Press and the media.

How long we keep personal information:

We will keep the personal information you provide whilst you are a tenant of a property we manage and we will also retain your personal information even after the end of your tenancy if this is necessary to comply with our legal obligations, meet regulatory requirements, resolve disputes, maintain security, prevent fraud or to enforce any outstanding debts owed to us.

A copy of our Record Management Schedule which details the retention periods for tenant information is available upon request.

Your right to access personal information:

You can find out if we hold any personal information about you by making a 'subject access request' under the GDPR. If we do hold information about you, we will:

- Give you a description of it;
- Tell you why we are holding;
- Tell you who it has been disclosed to; and
- Let you have a copy of the information in an intelligible form.

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

You can request access to the information we hold about you at any time by contacting us (please see contact details section below). Please mark your request for the attention of our Data Protection Officer.

Your rights:

If you believe that any of the personal information we hold about you is incorrect, you have the right to ask us to rectify that information at any time.

You may also have the right, in certain circumstances, to request that we delete your personal information, to block any further processing of your personal information or to object to the processing of your personal information. There are some specific circumstances where these rights do not apply and we can refuse to deal with your request.

If we are processing your personal information based upon your consent (e.g. as part of our marketing or promotional activities or to make a voluntary referral to an external agency), you have the right to withdraw your consent at any time.

If you require any further information about your right to rectification, erasure, restriction of or object to processing or you wish to withdraw your consent please contact us (please see contact details section below).

Complaints:

We take any complaints we receive about the collection and use of personal information very seriously. We would encourage you to bring it to our attention if you think that our collection or use of information is unfair, misleading or inappropriate. You can make a complaint at any time by contacting us (see contact details section below).

If you think our collection or use of personal information is unfair, misleading or inappropriate or if you have concerns about the security of your personal information, you also have the right to make a complaint to the Information Commissioner's Office. You can contact the Information Commissioner's Office at the following address:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Contact us:

You can e-mail us at enquiries@sixtownhousing.org or write to us at the following address:

Six Town Housing, 6 Knowsley Place, Angouleme Way, Bury, BL9 0EL.

We have appointed a Data Protection Officer to oversee our compliance with this privacy notice. Our Data Protection Officer is Claire Rybczynski. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO using the details above.