

## **Privacy information – Current customers and those applying for a home with us**

### **How we use your information**

This document is to let you know how we use your information and what we do with it. Stonewater Homes is committed to ensuring that your privacy is protected.

As part of its role Stonewater Homes collects, uses and stores information about you for the purposes of managing your agreement with us, and enhancing our schemes. We are responsible for the information we hold about you.

We have split this document into sections so that you can easily find the information you need. The document covers:

- The type of information we use about you.
- What we do with that information.
- How long we keep hold of your information.
- Who we might share your information with and why.
- Your rights.
- How to contact us.

You can contact us at any stage with queries or concerns using the details in the "Contact Us" section below.

### **What information we use about you**

If we need to assess your eligibility to purchase your home, you will provide us with information about you, any partner or joint applicant, and those living with you. In particular we collect the following information:

- Name (including previous names), address, contact details and date of birth.
- National Insurance Numbers.
- Proof of your eligibility to housing and if you have an interest or equity in other property.
- Financial information and Details of your Household Income & relevant savings
- Immigration status and Right to Reside in the UK.
- Bank details,

- Copy of identification documents and proof of residency at your current address
- Information provided by our credit checking agencies and The Mortgage People.

If you provide us with personal information relating to members of your family or your associates we will assume that you do so with their knowledge and consent.

During the course of your agreement, we will also hold other information about you, either by you or by third parties. This will include:

- Any correspondence with or about you, your home and the conduct and behaviour of those who live at the property.
- Rent and Service Charge statements and payment records.
- Details of any complaints made by or against you.
- Any correspondence we have at your request with third parties.
- Where the safety of our staff is believed to be at risk, usually where a customer has threatened staff, or contractors working on our behalf, we may record this information on your record so that risks to our staff are minimised.
- In certain instances we will ask you for special category data. This is sensitive personal information, for example your racial or ethnic origin and health information.
- We will only collect your sensitive personal information where there is a clear need for us to do so, such as to provide MHCLG with this information. We also use sensitive personal information to ensure that we are complying with our obligations under the Equality Act 2010.
- When collecting any sensitive personal information about you, we will make it clear to you what information we are collecting and the reason for collecting it. We will always give you the opportunity not to answer.

From time to time we operate closed circuit television (CCTV), sound recording and/or use photography to capture evidence of breach of agreement, alleged anti-social behaviour or crime.

The calls to our Customer Contact Centre are recorded for training and monitoring purposes. These recordings can also be used as evidence in disputes or investigations of our customers or colleagues and are usually held for a period of 6 months

We may also take photographs at our events, our properties and in our communities to use for general marketing and publicity. However, photographs of individuals will only be used for these purposes with your consent.

If you do not provide the information we have asked for, we may be unable to provide you with certain services or benefits. If this arises we will discuss with you the implications of that decision.

## **What we do with the information we hold**

We will only use your personal data in accordance with the law.

We may need to use your information to ensure compliance with the terms of your lease or legal agreement, to discharge our legal obligations, or to undertake activities that are within Stonewater's legitimate interests, or in the public interest.

Our legitimate interests may include (but are not limited to):

- Eliminate discrimination or advance equality of opportunity
- Prevent and detect crime
- Conduct research and statistical analysis to improve our business processes and the services offered to our customers
- Evaluate our performance against other benchmarks

There are various ways we use your information, for example:

- The information provided in the application for housing is required to progress and consider your application at your request, to tackle fraud and to comply with the obligations and rights in your lease.
- We use relevant health and disability information for the purposes of ensuring that you receive the most appropriate form of housing for your needs.
- We share information with authorised contractors to provide Landlord services, for example repairs. Where we need to share personal data with our contractors, the relationship is governed by a contract which will include strict data sharing and confidentiality protocols. We only share personal information that is necessary to deliver the service.
- We also use relevant information to ensure the safety of those within our neighbourhoods and communities and to tackle crime and anti-social behaviour.
- We will use your information and record of your lease or legal agreement to respond to any queries or complaints made by you or members of your household and to deal with requests such as repairs and maintenance of your scheme.
- We will keep some information about you for Equality and Diversity monitoring purposes, although we will never use this information to make decisions about you.
- We pass data about your payment record to credit reference agencies and The Mortgage People to enable them to assist other organisations to assess your financial standing if you apply for products and services.

- Conduct research and statistical analysis to help improve the services offered to customers and our internal business processes, as well as to evaluate our performance. Where possible, statistical information is anonymised or pseudonymised.
- We conduct surveys relating to our services in order to assess satisfaction and make improvements based on customer feedback.

If in the future we need to process your personal data for a new purpose, we will provide you with further information about the nature and purpose of such proposed processing.

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

We will only keep your information for as long as we need it for the reasons we have set out.

Our general policy is to retain your file for a period of 2 years following the termination or transfer of your legal agreement so that we can use it where necessary for the purpose of collecting any unpaid rent, or resolving any other dispute arising under the agreement, after which point it will be securely destroyed.

There may be information that we do not require for that period of time and we will keep this under review to delete it when no longer needed.

There may be personal information that we are required to hold for longer in accordance with our obligations under legislation, for example information in relation to safeguarding or care issues, or under legislation such as the Voluntary Right to Buy, or Health & Safety.

### **Who will we share your information with?**

We will not share your personal information with third parties unless we are permitted or required to by law. Information about you and your household may be shared, only in appropriate circumstances with the following third parties:

- Local Authorities and government agencies to ensure you have access to appropriate benefits and services, and to protect the interests of you, your household and your neighbourhood.
- Credit reference agencies for the purposes of carrying out credit reference checks.
- On line payment solution providers such as Allpay for the purposes of providing a range of ways for our customers to make payments to us
- Our IT providers for the purposes of maintaining secure and up to date records and filing systems.
- External repairs and maintenance providers and health & safety consultants, in order to carry out our obligations under the lease and relevant legislation.
- Research Companies to carry out research on our customers or communities in order to improve services, know more about our customers/communities or establish if there are any

gaps in the services we provide, On these occasions, if contacted, you can refuse to participate in the research without prejudice.

- Debt collection agencies and legal advisers for the purpose of collecting rent and any other payments due under the lease or legal agreement, and any other enforcement issues.
- Where necessary, to utility companies, local authorities, probation services, support workers, doctors, drugs and/or alcohol services, MPs, police and our professional advisors such as auditors and solicitors.

Where we share your information, we always ensure that we provide only what is necessary and that appropriate arrangements are in place to protect the security and confidentiality of your information.

### **Your rights**

You have the right to:

- object to us using your information in certain ways
- have your information deleted from our systems in certain circumstances.
- request details of personal information which we hold about you under the Data Protection Act 2018, including information about how we use that information.
- ask us to correct or update your information if you believe that any information we are holding is incorrect or incomplete
- request that we transfer your information directly to a new landlord or other third party in certain circumstances.

If you would like us to look into any of these rights, please contact us and we will consider your request carefully. There may be circumstances where we still need to use your information in certain ways or keep hold of it, despite your request. If that is the case we will explain this to you.

You also have the right to lodge a complaint with the Information Commissioners' Office if you believe that we have not used your information properly, or if you have any other concerns about the way in which we deal with your information.

Further information about your data protection rights appears on the Information Commissioner's website at: [ico website](#)

### **Withdrawal of consent**

We may sometimes process your data for specific purposes which require your consent. If we do this we will always ask for your written consent and provide you with a copy. Where we are processing your personal data based on your consent, you have the right to withdraw that consent at any time. This may affect the services that we can make available to you but this will be explained in the consent form.

If you change your mind, or you are unhappy with our use of your personal data, please contact us.

## **Contact us**

If you have any queries or questions about the way we use your information, or you would like to talk to us about any of your rights as set out above, please contact us:

by email

[data.protection@stonewater.org](mailto:data.protection@stonewater.org)

by post to

Stonewater Ltd,  
Suite C, Lancaster House,  
Grange Business Park,  
Enderby Road,  
Whetstone,  
Leicester, LE8 6EP

by telephone

01202 319119

## **Last updated**

This notice is regularly reviewed and updated to ensure that it is accurate. This notice was last updated in October 2018.

Where there are substantial changes to this notice which might affect you, we will let you know.