

GDPR Fair Processing Notice for Tenants

How we use your personal information

In order to operate and provide key services, we must process personal data about you, and we recognise the need to treat it in an appropriate and lawful manner. The purpose of this notice is to make you aware of how we will handle your information.

Who we are

Chislehurst and Sidcup Housing Association (the Association) is a Registered Provider and is regulated by the Regulator of Social Housing. We provide social housing and support to individuals. The Association takes the issue of security and data protection very seriously and strictly adheres to requirements of the General Data Protection Regulation (GDPR); together with any domestic laws subsequently enacted. Under GDPR regulations, the Association is classed as the 'Controller' of information with the responsibility of deciding the manner and purpose of how personal information is processed. The appointed Data Protection Officer for the Association is the Chief Executive who can be contacted at csinfo@csha.org.uk, alternatively by calling 020 8467 9146.

Why we collect personal information

The law states that we can use your personal information only if we have a proper reason to do so. This includes sharing it outside the Association. The reasons why the Association may process your personal information are:

- To fulfil a contract we have with you, such as a Tenancy Agreement
- When it is in our legitimate interest
- When it is our legal duty
- When you consent to it
- When there is a vital interest

Information about you – what we collect and how it is collected

Personal information that we may collect includes:

- Name
- Address (current and former)
- Date of birth
- E-mail address
- National insurance number
- Bank details

We collect information either:

- Directly from you whether verbally, during face-to-face meetings, over the phone, or in writing using our internal forms, or
- Indirectly from other organisations such as local authorities, GPs, previous landlords, other organisations providing services to you.

The Association may also process sensitive personal information. This information can only be processed in certain circumstances. As the information is sensitive we will seek your consent to processing this type of information. It will depend on the relationship we have with you whether or not we process sensitive personal information. Examples of sensitive information include:-

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Health
- Sex life or sexual orientation

There must be a legitimate reason for asking for this type of information and we will always obtain consent before taking details of this nature.

We will use your information:

- To undertake and perform our obligations and duties to you in accordance with the terms of your Tenancy Agreement
- To enable us to supply you with services and information you request
- To enable us to respond to repair requests, housing applications or complaints
- To analyse the information we collect so that we can administer and improve the services we offer
- To send details of any changes to our services that may affect you
- For all other purposes consistent with the proper performance of our duties and service delivery including tenancy management, rent collection
- To contact you for your views on our services

We may receive information about you from third parties including:

- Benefits information, including awards of housing benefit
- Payments made by you to us e.g. from a bank or building society
- Complaints or other communications regarding behaviour or other alleged breaches of terms of your tenancy with us
- Reports as to the conduct or condition of your tenancy, including references from previous tenancies, and complaints of anti-social behaviour
- Details about help that you may need that we can provide or signpost you to (e.g. occupational therapy teams)

We also share information about you with third parties including sharing information that enables:

- Contractors to carry out repairs and maintenance in your home
- The Police, local authorities to carry out their duties
- Banks, local authority departments or other government departments e.g. Department of Works and Pensions to confirm payment details
- The emergency services to provide services whenever required



Unless required to do so by law, we will not share, sell or distribute any of the information you provide to us without your consent.

Security of information

When you give us your personal information we take steps to make sure it is kept secure and safe. Therefore:

- Paper records containing personal information are kept in locked filing cabinets
- Computers are password protected and locked when staff are not at their work stations
- Paper records are reviewed in accordance with the Association's Annual Data Cleansing and Retention Process and any that are no longer needed are shredded or disposed of as confidential waste.

How long we will keep your information

We review our data retention periods regularly and will only hold your personal data for as long as is necessary for the relevant activity, or as required by law (we may be legally required to hold some types of information), as set out in any relevant contract we have with you.

Retention periods are set out in our Annual Data Cleansing and Retention Process which is available on request from a Sheltered Housing Manager or from Head Office by telephoning 020 8467 9146.

Your rights

At any time you have the right to:

- Ask for a copy of information about you which we hold
- Ask us to amend any information about you which is inaccurate
- Ask us to delete your personal data
- Object to receiving marketing communications from us

If you would like to exercise any of your rights or for further information please see the Association's Subject Access Procedure; alternatively you can contact us on 020 8467 9146.

You also have the right to complain to the Information Commissioner's Office (ICO) in relation to our use of your information. The ICO's contact details are:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)

Fax: 01625 524 510