

Who this policy is for

This policy is primarily for residents of Wydean Housing Association (WHA) and people who apply for housing with WHA. However, it also applies to landlords whose properties we manage, anyone who applies for a job with us and visitors to our website.

Introduction

Wydean Housing Association is a community benefit society with charitable status. We're a data (information) controller under the United Kingdom General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

The European Commission describes processing personal information as 'the collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of personal data.'

We process personal information about our residents, people who apply for housing with us, landlords whose properties we manage, people who apply for jobs with us and visitors to our website. This privacy policy will help you understand how and why we do this.

If you have any questions about this privacy policy or what we do with your personal information, please contact us using the details in the [How to contact us](#) section at the end of this policy.

The information we may collect about you

The personal information you provide to us, we collect from you or we receive about you from third parties may include:

- your name, address and address history, date of birth, gender and proof of identity
- your telephone number and email address
- your National Insurance number
- your financial information, including pay slips, bank details and credit or debit card details (although we do not keep complete credit or debit card information)
- details about your family and dependants, such as your marital status and number of children
- details about anyone authorised to act on your behalf, if applicable
- proof of your housing eligibility and any interest or equity you have in other property
- information about your living circumstances, such as your employment details, income details and home ownership
- profile data, including your preferences (for example, if you're applying to buy a property from us), feedback and survey responses
- any criminal convictions you have, or information about anti-social behaviour or fraud you're alleged to have committed
- details about your health and medical history





- information about any disabilities or vulnerabilities you have
- your race, ethnicity, religious beliefs, sexual orientation
- other personal information we need to provide you with the service or support you've requested
- aggregated data such as statistical or demographic data that do not identify you individually.

We may also use information about you that is publicly available from external sources.

How we collect information about you

We may collect information about you when you:

- apply for one of our properties or services
- apply for a job with us
- register to receive information from us
- call, write, email, text, meet with us, respond to a survey or enter a competition
- report a repair or pay your rent or a service charge
- set up a standing order
- interact with our website through automated technologies such as cookies
- contact us on social media
- make a complaint or provide feedback
- contact us by telephone (we may record calls for training and monitoring purposes and will usually keep recordings for three months).

And when we:

- operate CCTV or sound recording systems to detect and prevent crime and to capture evidence of breach of tenancy or anti-social behaviour (we'll display appropriate notices where we have recording equipment in operation)
- take photographs at our events, at our properties and in our communities to use for general publicity (we'll only use photographs in which you can be identified if you've given us your written consent)
- receive information about you from third parties, including local authorities, benefits offices, the police, statutory agencies, health services and support organisations, financial institutions, credit agencies, councillors, MPs or other representatives acting on your behalf.

What we use your information for and the legal grounds we have for processing it

We process information about you so we can:

- deliver the services you need, and
- see how we can improve our services.

For example, we need to know certain things about you to manage your tenancy, give you help and support or deal with your job application.



The legal grounds for processing your information are usually that it's necessary for a contract we have with you (for example, your tenancy agreement) or for the discussions we need to have before we can enter into a contract with you.

We sometimes need to process your information so that we comply with the law. For example, we must inform the relevant authorities about benefits fraud.

We also have a legitimate interest to process your information so that we can run our business effectively. For example, we may pass your details to a debt collection agency if you have not paid your rent or service charge so that we don't lose the money we're owed.

The table in Appendix 1 shows the types of personal information we process and the legal grounds we have to do this.

How we use your personal information for automated decision-making and profiling

We may analyse your personal information to help us understand your needs and make sure we only contact you with information that is relevant to you.

For example, we may analyse your personal information to:

- see if you are at risk of winter fuel poverty and eligible for extra support. This also helps us meet our promise to provide you with a safe place to live.
- contact you with advice on how to manage your money, claim benefits and look after your well-being.

We will only ever analyse your personal information or use it for profiling in line with the legal grounds shown in Appendix 1.

Who we may share your personal information with

Where relevant to the services we provide to you, we may also share your personal information with:

- our contractors and sub-contractors and other organisations acting on our behalf, including our maintenance contractors, health and social care professionals, our out-of-hours telephone service contractor, our market research contractors and online payment service providers (such as WorldPay)
- research companies we appoint to help us learn more about our residents and improve our service (you can refuse to participate in research without prejudice and opt out of future research by contacting office@wyedean.org)
- doctors and mental health teams





- next of kin and other family members
- managing agents
- other landlords
- local authorities and choice-based lettings (CBL) organisations
- social services
- the police and other emergency services
- government agencies and departments
- regulatory bodies
- utility companies
- council tax offices
- mortgage brokers, financial advisors, surveyors and valuers (relating to a property sale)
- auditors
- commissioners
- tracing agents, debt collection companies and credit reference agencies
- other bodies to prevent or detect fraud.

We insist that all third parties respect the security of your personal information and treat it in line with the law. We only permit our third-party service providers to process your personal information for specific purposes in line with our instructions.

How we keep your information secure

We do all we can to keep your information secure. To prevent unauthorised access or disclosure, we have physical, electronic and operational procedures that safeguard and secure the information we process.

When you make a payment online, for example when you pay your rent or service charge, we use a third-party online payment service provider such as WorldPay to process the payment. These companies use secure socket layer (SSL) technology to protect personal information. SSL ensures that information sent during a transaction is protected against unauthorised interception. It's currently the preferred way to transfer credit card and other sensitive information over the internet.

We also have procedures to deal with any suspected personal data breach. We'll notify you and any applicable regulator of a breach where we're legally required to do so.

Processing your information outside of the EEA

We will not transfer or store your personal information outside of the European Economic Area (EEA) unless:

- the country we send the information to is approved by the Information Commissioner's Office (ICO) as providing an adequate level of protection for personal information; or
- the recipient has agreed with us standard contractual clauses approved by the ICO that require the recipient to safeguard the personal information; or
- another situation exists where the transfer is permitted under applicable data protection legislation.





If you choose not to give personal information

We may need to collect certain personal information by law or under the terms of a contract we have with you.

If you choose not to give us this personal information, it may delay or prevent us from meeting our obligations to you. It may also mean that we cannot perform the services you've asked for. In some circumstances, it could mean that we need to terminate our relationship with you.

We'll always tell you at the time you refuse to provide personal information if this will affect our ability to provide services to you.

How we use your personal information for marketing

We may use your personal information to tell you about relevant services. This is what we mean when we talk about marketing.

We analyse your personal information to help us understand what you may want or need or what may interest you. This is how we decide which products, services may be relevant for you.

We may ask you to confirm or update your marketing and contact choices if you take out any new products or services with us. We will also ask you to do this if there are changes in the law, regulation or the structure of our organisation.

We will only send you messages where we have your consent to do so. You can ask us to stop sending these messages by following the unsubscribe link in any marketing email you receive or by contacting us using the details in the [How to contact us section](#) at the end of this policy.

Whatever you choose in relation to marketing, we may still need to contact you for other reasons so we can provide the products and services you have asked for and tell you about changes to your existing contract with us.

How long we keep your personal information

We will only keep your information for as long as we need it to fulfil the purpose we collected it for, including to satisfy any legal, accounting or reporting requirements and in line with our retention and disposal guidelines.

Your rights

Under current law, you have the following rights in respect of your personal information to:

- access and have copies of the personal information we hold about you, for example to make a subject access request (SAR) or to transmit that personal information to another data controller





- (right to data portability)
- tell us to stop processing your personal information if the processing is causing you damage or distress
 - tell us not to send you marketing communications
 - tell us to erase your personal information
 - object to, or tell us to restrict, our data processing activities
 - tell us to correct the personal information we hold about you if it is incorrect.

These rights may be limited by the legislation, and we may be entitled to refuse requests where exceptions apply. You can find out more about your rights from the Information Commissioner’s Office. Their contact details are in the [How to complain](#) section below.

Where we rely on your consent to process your personal information, you can withdraw your consent at any time.

If you want to exercise any of your rights, please contact us using the details in the [How to contact us](#) section at the end of this policy.

Visitors to our website

Our website uses cookies. To find out more about how we use cookies, please see our cookies policy.

Our website may include links to third-party websites, plug-ins and applications. Clicking on these links or enabling those connections may allow third parties to collect or share information about you. We do not control these third-party websites and are not responsible for their privacy notices. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Our website is not intended for children and we do not knowingly collect information relating to children.

Residents who use the MyWHA app

When you register for MyWHA, we collect personal information about you so you can pay your rent, report a repair, request help, manage your account, make a complaint, comment or compliment and report anti-social behaviour online.

The type of information we collect about you and what we need it for is covered in this privacy policy.

When you give us personal information, we take steps to ensure that we treat it securely. Any sensitive information, such as credit or debit card details, is encrypted and protected using 28-bit encryption on SSL software. A lock icon will appear in the website’s address to show you’re on a secure page.

You’ll have chosen a password so you can access certain parts of our website. You are responsible for keeping this password confidential. For your security, never share your password with anyone.





How to complain

We try to meet the highest standards when we process your personal information and treat any complaints we receive about our data handling very seriously.

We encourage you to contact us with any concerns you have about how we process your personal information. We also welcome your suggestions for how we can improve our policies and procedures.

We deal with all complaints in line with our Complaints, Comments and Compliments policy. You also have the right to complain to the Information Commissioner's Office (ICO). You can contact the ICO at:

Website: <https://ico.org.uk>

Telephone: 0303 123 1113

This privacy policy does not give exhaustive details of how we collect and use personal information. If you'd like to find out more, please contact us using the details in the [How to contact us](#) section at the end of this policy.

Changes to this privacy policy

We review this privacy policy regularly.

How to contact us

Email us at: office@wyedean.org

Telephone us on: 01594 838 000

Write to us at: Wyedean Housing Association
11 St John Street
Coleford
Gloucestershire
GL16 8AP





Appendix 1: the types of personal information we process and the legal grounds we have to do this

Type of personal information	Reason	Legal grounds
Contact details, e.g. name, address, telephone number and email address	<p>So we and our contractors can contact you</p> <p>So any research company we appoint to help us improve our services can contact you</p>	<p>To perform or prepare to perform a contract with you</p> <p>Legitimate interest</p>
Proof of identity, e.g. photo ID, National Insurance number, date of birth	Proof that you are eligible for housing	Legal obligation
Financial information, e.g. proof of income, bank account, credit or debit card details	<p>To see if you're eligible for housing or support</p> <p>So you can pay your rent and set up a standing order</p> <p>So we can contact you with advice on how to manage your money, claim benefits and look after your wellbeing</p>	<p>To perform or prepare to perform a contract with you</p> <p>Legitimate interest</p>
Information about, e.g. your family, marital status, children and employment	To see if you're eligible for housing or support	<p>To perform or prepare to perform a contract with you</p> <p>Legitimate interest</p>
Information about, e.g. rent arrears, anti-social behaviour	To give another landlord a tenancy reference	<p>To perform or prepare to perform a contract with you</p> <p>Legitimate interest</p>





Type of personal information	Reason	Legal grounds
Criminal convictions	To see if you're eligible for housing, support or a job	Legitimate interest Legal obligation, including to prevent crime and protect individuals
Details of your preferences when you apply for a property with us, e.g. how many bedrooms	To tailor the search to your requirements	To perform or prepare to perform a contract with you
Information about your race, ethnic origin, religion, or sexual orientation	To monitor our service To comply with employment law	Legal obligation To fulfil our obligations and exercise our rights in relation to employment, social security and social protection law Explicit consent
Information about your health and medical history, including details of prescribed drugs	To assess your needs and capacity to work To ensure we seek appropriate medical help in an emergency	To perform or prepare to perform a contract with you To assess an employee's capacity to work To provide and manage health and social care services, including in line with a contract with a health professional Explicit consent Vital interests
Information about potential anti-social behaviour or violence	To safeguard our staff and contractors	Legal obligation Legitimate interest



Privacy Policy



Type of personal information	Reason	Legal grounds
Information about disabilities or vulnerabilities	<p>To assess your needs and capacity to work</p> <p>To safeguard staff</p>	<p>Legal obligation</p> <p>To perform or prepare to perform a contract with you</p> <p>To assess an employee's capacity to work</p> <p>To provide and manage health and social care services, including in line with a contract with a health professional</p> <p>Explicit consent</p>
Emergency contact details	In case of emergency	<p>Vital interests</p> <p>Explicit consent</p>
Marketing and communications	<p>To update our records</p> <p>To study how you use our products and services</p>	Legitimate interest

