

# Customer Privacy Statement

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# Contents

1. Protecting your privacy
2. About us
3. What personal data do we hold?
4. How will we use your personal data?
5. Who will we share your personal data with?
6. Technical and organisational measures
7. International transfers of data
8. How long will we retain your personal data?
9. Your rights
  - 9.1 Right of access
  - 9.2 Right to rectification and erasure
  - 9.3 Right to restriction of processing
  - 9.4 Right to portability
  - 9.5 Right to withdraw consent
  - 9.6 Right to object
  - 9.7 Automated decision making and profiling right
10. Failure to provide personal information
11. Further information

## Appendix

- A: Version history

## 1. Protecting your privacy

Connect Housing Association is committed to protecting the right to privacy of its customers. We appreciate the importance and confidentiality of the personal information that you disclose to us. This includes when accessing the Association's services, signing a tenancy agreement or visiting our website. We will always take great care to fulfil our responsibilities under the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

This statement sets out the basis on which any personal data we collect, create or otherwise obtain from or about you will be processed by us. We are committed to protecting and respecting your privacy and complying with the Data Protection Principles outlined in the Data Protection Act 2018.

## 2. About us

Connect Housing Association is a Data Controller with its registered address at 21 Bond Street, Dewsbury, WF13 1AX, United Kingdom; telephone number 0300 5000 600.

As a data controller, Connect Housing Association determines how the personal data that you provide will be used to carry out the business of the organisation.

## 3. What personal data do we hold?

The information we hold on our records concerns our relationship with you. For example, we could hold the following types of data about you:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender, National Insurance number, information about previous housing circumstances and identity documents (e.g. driving licence, passport, photographic ID).
- **Contact Data** includes billing address, delivery address, email address and telephone numbers. It also includes next of kin and appointee contact details.
- **Financial Data** including the amount of money you have paid us, any amounts outstanding and associated recovery action. Depending on your chosen method of payment, this could include bank account details, welfare benefits payments information, and income and expenditure (affordability) details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.

- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes who lives in our houses, purchases or orders made by you, your interests, preferences, your username and password, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Behaviour Data** includes a record of your compliance with your tenancy with us, information on your behaviour from partner agencies such as local authorities, policing bodies and other housing providers, and surveillance such as CCTV footage and noise nuisance recordings. We may hold information about you if you are engaged with our additional guidance and support services, for example we may hold information about your job history and skills if providing services to support access to training and employment.

We may collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. If we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We may collect **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). We may also collect any information about criminal convictions and offences.

This list is not exhaustive, as we hold records of most contacts we have with you, or about you. We process this information so we can deliver services to you. Generally, the information we hold will have been provided by you (on application or enquiry forms or when we communicate with you), but we may also hold information provided by third parties where this is relevant to your housing circumstances e.g. from social workers and health professionals.

We will only ask for personal information that is appropriate to enable us to deliver our services. In some cases, you can refuse to provide your details if you deem a request to be inappropriate. However, you should note that this may impact our ability to provide some services to you if you refuse to provide information that stops us from doing so.

## 4. How will we use your personal data?

The personal data that you provide to us will enable us to fulfil our obligations to you and provide you with the appropriate services and support that you may require. Under the Data Protection Act 2018, Connect Housing Association must have a legal basis to process your personal data. Usually this falls within our contractual obligations to fulfil your tenancy agreement or for Connect to provide relevant goods or services, however it could be through your consent or it may be necessary for the legitimate interests of Connect Housing Association or a third party.

To enable us to provide you with the best service possible, Connect Housing Association may use your personal details:

- for market research purposes and to get your views and feedback to help us improve the services you receive.
- to ensure that we are meeting all our customers' needs and improve our services. We may segment the data we hold in order to do that.

We may contact you about our services and products and ask you if you would like to get involved in the activities and groups which we hold for customers. We may anonymise your personal data, including special categories of personal data, for use in monitoring and evaluation of our services. Fully anonymised data may also be shared with other parties including academic institutions for research purposes.

We will aim to seek your preferences about how you would like to be contacted and these preferences can be changed at any time.

Our legal basis for processing your information for all of the above purposes is:

- **Contract:** the processing is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract. Failure to provide such personal data would mean that we are unable to provide our services to you.
- **Legal Obligation:** the processing is necessary for us to comply with the law (not including contractual obligations).
- **Vital Interests:** the processing is necessary to protect someone's life.
- **Legitimate interests:** the processing is necessary for our legitimate interests, or the legitimate interests of a third party, unless there is a good reason to protect your personal data and rights and freedoms which would override those legitimate interests.
- **Consent:** you have given clear consent for us to process your personal data for a specific purpose. Where consent is the lawful basis for processing, you have the right to withdraw your consent at any time.

The table below sets out the type of personal data we collect, the purpose of collecting this data and the legal basis for doing so:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new Customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver services to you including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us (c) Meet our obligations to you under law and your Tenancy Agreement with us. (d) Enforce your obligations to us under law and your Tenancy Agreement with us. (e) Provision of support services	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications (f) Behaviour	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which may include: (a) Notifying you about changes to our terms or privacy statement (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
If you are a contractor or their staff to manage our relationship with you which will include:	(a) Identity (b) Contact (c) Financial (d) Behaviour	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation

<p>(a) Paying you monies owed under the contract.</p> <p>(b) Meeting our obligations to you under law and your contract with us.</p> <p>(c) Enforcing your obligations to us under law and your contract with us.</p>	(e) Transaction	(c) Necessary for our legitimate interests (contract management generally and individually)
<p>To administer and protect our business and our websites, electronic applications or similar electronic tools (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(f) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical</p> <p>(b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p> <p>(d) Usage</p> <p>(e) Profile</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>
CCTV Footage	Identity	Legitimate Interest Public interest and legal obligation

Where the legal reason for processing is the performance of a contract with you, if you do not provide relevant personal data we will not be able to fulfil our contractual obligation(s) to you and this may have a detrimental impact on you.

Connect Housing may process the following special categories of personal data, for the following typical reasons (this list is not exclusive).

Special category of personal data	Justification	Example
Racial or ethnic origin	Explicit consent. Public knowledge brought about by the person whose personal data it is. Legal disputes.	Connect Housing monitors racial or ethnic origin for equality and diversity purposes.
Religious or philosophical beliefs	Explicit consent. Public knowledge brought about by the person whose personal data it is. Legal disputes.	Connect Housing monitors religious or philosophical beliefs for equality and diversity purposes.
Health and disabilities	Explicit consent. Public knowledge brought about by the person whose personal data it is. Legal disputes. Vital interests.	Connect Housing handles health personal data when helping vulnerable customers with normal landlord activity such as repairs or minor adaptations.
Sex life	Substantial public interest. Explicit consent.	Connect Housing would be under a duty to make a safeguarding referral if a person's sexual activity endangered a child or vulnerable adult.
Sexual orientation	Employment law obligations. Explicit consent. Public knowledge brought about by the person whose personal data it is. Legal disputes.	Connect Housing monitors sexual orientation for equality and diversity purposes.
Criminal	Statutory rights	Connect Housing processes alleged convictions and offences (not a special category in law) and proven criminality when



		tackling anti-social behaviour.
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## 5. Who will we share your personal data with?

On occasion it will be necessary to share your personal data with third parties. For example, Connect Housing uses a number of contractors to maintain and service its properties. Connect Housing will only share relevant and necessary information with them and in such circumstances we will have a Data Processing Agreement in place that ensures your data is used properly and protected.

Wherever possible we will aim to gain consent from you before sharing your personal information with third parties, such as debt advice and mental health services when providing you with any necessary support that you may require. However sometimes circumstances mean that we are unable to do so. Information sharing with agencies such as the Police, HM Courts & Tribunal Services and Social Services is vital to safeguarding and promoting the welfare of children, young people and vulnerable adults. Connect may share information with these agencies without seeking consent, for example concerns about the welfare of children or vulnerable adults, certain types of criminal activity or health and safety hazards. We will ensure that no personal data is disclosed without a valid lawful basis under the Data Protection Act 2018.

Connect Housing holds a number of information sharing agreements/data processing agreements where we share information regularly with organisations; this ensures that data shared is processed in accordance with the law.

Examples of organisations where we share information with include but is not limited to:

- Department for Work & Pensions
- Utility companies (and their representatives) and Council Tax Offices, to ensure they have the correct address details and customers are correctly charged
- Contractors and suppliers working for Connect
- Local Authorities: housing registers, social services and multi-agency working, for exercising statutory, governmental, and other public functions such as handling safeguarding issues
- The Police and other relevant authorities (e.g. Probation Service, HM Revenues and Customs) in relation to the prevention or detection of crime and fraud; the apprehension or prosecution of offenders and the assessment or collection of tax or duty.
- With third party service providers, in connection with services performed on our behalf. For example, a confidential waste disposal company shredding our documents
- With other registered providers, trusts and landlords, in connection with tenancy references and associated enquiries
- With our partners in connection with the delivery of services, such as managing agents
- With credit reference agencies and debt collection agencies, in connection with some housing applications and in relation to any outstanding charges

- With our regulator, the Regulator of Social Housing, to comply with our regulatory obligations

This list is not exhaustive as there are other circumstances where we may also be required to share information, for example:

- To meet our legal obligations
- In connection with legal proceedings (or where we are instructed to do so by Court order)
- To protect the vital interests of an individual (in a life or death situation).

## 6. Technical and organisational measures

Connect Housing has a number of electronic and physical security measures to ensure the safety of your personal data. Only authorised personnel have access to your personal data and all staff are bound by our Confidentiality and Data Protection and Acceptable Use policies.

Any information you submit during the course of an online interaction through our website is stored securely in compliance with UK GDPR.

Our website may contain links to other websites run by other organisations. This Privacy Notice only applies to the information that we hold, therefore we encourage you to read the privacy notices on the other websites you visit.

Connect Housing will always make you aware when we use cookies and will always give you an option to reject cookies.

## 7. International transfers of data

Connect Housing Association uses Survey Monkey, based in the US, to facilitate the sending of customer surveys from time to time. Connect will ensure that any transfers of data to countries without an adequacy decision from the ICO will be made on the basis of Standard Contractual Clauses.

## 8. How long will we retain your personal data?

Connect will usually store your personal data for a maximum of 6 years post tenancy, except for certain documentation such as tenancy agreements and care plans which we may need to retain longer for legal or safeguarding reasons. We will not keep your information for longer than is strictly necessary and it will always be in line with legal or regulatory requirements explained in Connect Housing's Data Retention Policy.

You have the right to access any of your personal information we have used, to correct any erroneous information, and in certain circumstances, erase the data.

## 9. Your rights

### 9.1 Right of Access

You have the right of access to information we hold about or concerning you. If you would like to exercise this right, please do so in writing and ensure this is accompanied by proof of identity. If you are seeking to obtain specific information (e.g. about a particular matter or from a particular time period), it helps if you clarify the details of what you would like to receive in your written request. If someone is requesting information on your behalf, they will need written confirmation from you to evidence your consent for us to release this and proof of ID (both yours and theirs). We have one month to provide you with the information you've asked for starting from the date the request was submitted (although we will try to provide this to you as promptly as possible). We may extend the time to respond up to 2 further months if the request is complex or a number of different requests from the same individual have been received. In response to SARs, we will provide you with a copy of the information we hold that relates to you. This will not generally include information about your property such as repair logs, details of contractor visits, or general property maintenance information as this is unlikely to be 'personal information'. Individual rights requests are free of charge however, we may charge for the administrative costs of complying with a request if it is manifestly unfounded or excessive, or further copies of data are requested.

### 9.2 Right of Rectification or Erasure

If you feel that any data that we hold about you is inaccurate, you have the right to ask us to correct or rectify it. You also have a right to ask us to erase information about you where you can demonstrate that the data we hold is no longer needed by us, or if you withdraw the consent upon which our processing is based, or if you feel that we are unlawfully processing your data. Your right of rectification and erasure extends to anyone we have disclosed your personal information to and we will shall take all reasonable steps to inform those with whom we have shared your data about your request for erasure.

### 9.3 Right to Restriction of Processing

You have a right to request that we refrain from processing your data where you contest its accuracy, or the processing is unlawful and you have opposed its erasure, or where we don't need to hold your data anymore but you need us to in order to establish, exercise or defend any legal claims, or we are in dispute about the legality of our processing your personal data.

### 9.4 Right to Portability

You have a right to receive any personal data that you have provided to us in order to transfer it onto another data controller where the processing is based on consent and is carried out by automated means called a data portability request.

## 9.5 Right to Withdraw Consent

Where you have provided your consent to the collection, processing and transfer of your personal data, you may withdraw that consent at any time. This will not affect the lawfulness of data processing based on consent before it is withdrawn.

To withdraw your consent please contact the Senior Manager Business Assurance at Connect Housing who is our data protection lead.

## 9.6 Right to Object

You have a right to object to our processing of your personal data where the basis of the processing is our legitimate interests including but not limited to direct marketing and profiling. In certain circumstances our right to process your personal data will override your right to object to us doing so (i.e: where the lawful basis for processing is performance of a contract).

## 9.7 Automated Decision Making and Profiling Right

Automated decision-making is where a decision is made entirely by technological means without human intervention. We do not use or rely on automated decision-making.

You have a right to lodge a complaint with the Supervisory Authority (Information Commissioners Office (ICO) in the UK at [www.ico.org.uk](http://www.ico.org.uk)), should you feel that we have not handled your information in line with legislative and regulatory requirements.

They can be contacted at:

Information Commissioners Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113 | Visit: [www.ico.org.uk](http://www.ico.org.uk)

## 10. Failure to provide personal information

Where we need to collect personal data by law or in order to process your instructions or perform a contract we have with you and you fail to provide that data when requested, we may not be able to carry out your instructions or perform the contract we have or are trying to enter with you. In this case, we may have to cancel our engagement or contract you have with us, but we will notify you if this is the case at the time.

## 11. Further information

For further information on how to request your personal information, how and why we process your information, you can contact us using the details below:

Head of Business Assurance

Connect Housing

21 Bond Street

Dewsbury

WF13 1AX

Tel: 0300 5000 600 | Email: [hello@connecthousing.org.uk](mailto:hello@connecthousing.org.uk)

# Appendix:

## A: Version History

Version	Date	Summary of Changes
5	January 2024	Updated to include all requirements of GDPR, specifically Articles 13 & 14.
4	December 2022	Annual review of statement. Updated to include reference to anonymisation of personal data
3	July 2021	Updates to reflect UK GDPR, changing regulation for international transfers, update to contact details for Senior Manger Business Assurance
2	2019	Minor amends including more detail on the categories of personal data we collect and how it is processed.
1	2018	Original