

## **Waterloo Housing Group Privacy Notice (Customers)**

### **Introduction**

At Waterloo Housing Group Limited, we are committed to safeguarding and preserving your privacy at all times. This Privacy Notice explains what happens to any personal data that you provide to us, or that we collect from you.

It applies to personal data relating to applicants for housing (rented and low cost home ownership), tenants/leaseholders and other service users. It tells you the purposes for which we may process your personal information and the legal basis for this. The Group is committed to being transparent about how it uses and collects personal data and to meeting its data protection obligations.

### **Who we are**

For the purpose of the Data Protection Act and General Data Protection Regulation (GDPR), Waterloo Housing Group Limited is what is known as the data controller. We will only process your personal data if one or more of the following conditions are met:

1. You have given consent for one or more specific purposes;
2. Processing is necessary to meet contractual obligations entered into by you (e.g. tenancy, lease or application for housing);
3. Processing is necessary to meet our legal obligations as data controller;
4. Processing is necessary to meet the vital interests of the data subject;
5. Processing is necessary for tasks in the public interest or exercise of authority vested in us as data controller; and
6. Processing is necessary for the purposes of our legitimate interests as data controller.

For certain special categories of personal data (for example race, ethnic origin, religion or belief, health data or sexual orientation) we will only process this in the following additional circumstances:

1. You have given your explicit consent to this;
2. It is necessary to fulfil our obligations or exercise rights as data controller or data subject in employment or social security;
3. It is necessary to protect the vital interests of the data subject; and
4. For the establishment, exercise or defence of any legal claims.

In addition we will process this data for reasons of equality of opportunity or treatment and where processing of the specified category/ies of data is necessary for the purposes of identifying or keeping under review the existence of equality of opportunity or treatment.

## **What information we collect**

We may collect the following information about you in order to operate as a registered provider of housing and deliver efficient and effective services to customers:

- Names and dates of birth, photographic ID and information about your household and about your previous housing circumstances to assess housing applications and prevent tenancy fraud;
- Contact details for you so we can communicate with you by your preferred means, and to keep you informed about services we offer which may be useful to you relating to your tenancy, lease or application for housing;
- Information about your household needs (for example if you have a carer or social worker, if you need adaptations in your home, if you need information in large print or audio CD) to ensure that the services we provide meet your needs and improve our communications with you;
- Information to enable us to provide housing management services to you (for example any reports of anti social behaviour, criminality, complaints, changes in circumstances and information about your related housing needs);
- Financial records about the amount of money you have paid to us (for example for rent and any service charges), any amounts outstanding and action taken to recover any money owed to us;
- Recording of calls to our contact centres for training and monitoring purposes to ensure we deliver a good service to you. All such call recordings will be held in accordance with our Data Retention Policy;
- We may capture images on our CCTV systems if you visit a property, office or communal facility covered by such a system. Any CCTV recordings will be held in accordance with our Data Retention Policy;
- details of your visits to our websites and the resources that you access including information that you provide by filling in forms on our website or through other means (such as applying for a home);
- information that you provide to us when you communicate with us for any reason; and
- information that you provide by completing customer surveys or to send you customer newsletters related to your tenancy or lease, or for another agreed purpose (for example, to investigate a complaint).

Generally, the information we hold will have been provided by you, but we may also hold information provided by third parties where this is relevant to your tenancy, lease or housing application. For example, information provided by social workers or health professionals such as doctors and occupational therapists.

We will only ask for personal information that is appropriate to fulfil our services to you.

Please note too that we will only contact you to undertake any general market research or to send you any direct marketing of products or services where you have given explicit consent to this, which you can withdraw at any time. Such consent is not required however for the performance of any contract you may have with us.

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

We require this information to understand your needs and provide you with a better service. In particular, we need it for the following reasons:

- To enable us to perform a contract with you (for example tenancy or lease conditions) or to comply with our legal obligations;
- To maintain accurate and up to date internal records;
- To help us improve our products and services; and
- To allow us to send you information that you have requested or that we think you may find interesting, using the contact details which you have provided. You may opt out of receiving such information from us at any time.

We will not collect any personal data from you that we do not need in order to provide our services to you.

The personal data we hold is used for the reasons highlighted above. We have clear data protection measures in place (both automated and otherwise) to ensure we protect your data. Please ask to see our relevant data protection policies and procedures.

We will treat your personal information fairly and lawfully and will ensure that the personal information is:

- Processed only for one of the purposes outlined in this privacy notice;
- Kept up to date, accurate, relevant and that we do not collect excessive amounts of information;
- Not kept longer than necessary; and
- Kept secure.

We are committed to keeping your personal details up to date and we would request you to inform us of any changes needed to ensure your details are accurate. To help us ensure confidentiality relating to your personal information we will usually ask you security questions to confirm your identity when you call us.

## **How long we keep data**

All personal data is held for the period outlined in our Data Retention Policy. This period may vary depending on the purposes for which the data has been collected, but will be destroyed in all cases following the expiry of the stated retention period.

## **Security**

We are committed to ensuring that your information is secure. All our staff have contractual obligations of confidentiality, enforceable through disciplinary procedures. All staff will receive appropriate training on confidentiality of information.

We take relevant organisational and technical measures to ensure the information we hold is secure – such as holding information in secure locations, restricting access to information to authorised personnel, protecting personal and confidential information held on equipment such as laptops with encryption. However, the transmission of information via the internet is not completely secure and so we cannot guarantee the security of data sent to us electronically.

## **Data processing**

We use a number of data processors who act on our behalf to process personal data. Please refer to the Appendix which provides the details of who these are.

All these organisations are subject to the same legal rules and conditions for keeping personal confidential data secure. We ensure that our partner agencies have contracts / information sharing agreements which outline that your information is processed under strict conditions and in line with the law. Waterloo Housing Group Limited remains the data controller (the organisation responsible for determining the purposes for which and the manner in which personal data is used under the Data Protection Act and General Data Protection Regulation) of such information at all times.

## **How we use cookies on our websites**

Cookies are small text files which, with your permission, are placed on your computer's hard drive by websites that you visit. They are widely used to help websites work more efficiently, to analyse web traffic and to gather information about your preferences.

We use traffic log cookies to identify which pages of our website are being used. This helps us improve our website and tailor it to our visitors' needs. We only use this information for statistical analysis purposes and then the data is removed from the system. Cookies do not enable us to identify you personally and do not give us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from using all the functions of the website.

## **Links to other websites**

Our website contains links to other third-party websites of interest. When you use these links to leave our site, please be aware that we do not have any control over these external websites. We cannot be responsible for the protection and privacy of any information which you provide whilst visiting these sites and they are not governed by this privacy statement. You should be careful about the information you provide and look at the privacy statement applicable to the individual website.

## **Google Analytics**

Our website uses Google Analytics to analyse the traffic on our website. For more information on Google's services please go to [www.google.com/analytics](http://www.google.com/analytics).

## **Disclosing your information**

Where applicable, we may disclose your personal information to any member of our Group, including our subsidiaries.

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so.

There may be times when we may need to share personal information with third parties for the purposes outlined in this notice, or where we are legally required to do so. The main examples will be as follows:

- To comply with the law or a court order;
- To assist fraud protection and minimise credit risk;
- In connection with any court proceedings or legal action to enforce compliance with tenancy or lease conditions;
- Where there is a formal data sharing protocol with the police or a local authority;
- For contractors of other agents providing services on behalf of Waterloo Housing Group;
- Information on names or dates of occupancy to utility providers (e.g. gas, electricity, water);
- Information required by the Regulator of Social Housing to ensure that we comply with their expectations of Waterloo as a registered housing provider; and
- To protect the vital interests of an individual.

## **What are your rights?**

As a data subject you have a number of rights.

You may request details of personal information which we hold about you under the Data Protection Act. If you would like a copy of the information held on you please write to the Data Protection Officer at Waterloo Housing

Group, 1700 Solihull Parkway, Birmingham Business Park, Solihull, B37 7YD or email [Data Protection](#). We will need to first verify your identity in order to provide this information to you and will normally do so within 30 days from receipt of this. There may however be some exceptions to this where we will contact you within 30 days to advise of this.

If you believe that any information we are holding on you is incorrect or incomplete please write to, or email, us as soon as possible at the above address. We will promptly **correct or delete** as appropriate any information found to be incorrect.

In some circumstances data subjects have the **right to erasure** of personal data. This is not an absolute right however and we may refuse this in a number of circumstances e.g. where the data is needed to comply with a legal obligation, for the exercise of legal claims or for any vital interests or tasks carried out in the public interest.

In certain circumstances there is a **right to restrict** data processing. These are as follows:

- An individual contests the accuracy of the personal data held - for a period that enable Waterloo as data controller to verify its accuracy;
- An individual objects to the processing pending verification that the legitimate grounds of controller override those of the data subject;
- If the processing is unlawful and the individual opposes erasure and requests restriction instead; and
- If Waterloo no longer needs the data as data controller but the individual requires data to establish, exercise or defend a legal claim.

In such circumstances, restricted data may only be processed with consent, in relation to legal matters or to protect the rights of another individual. We will then inform individuals should we decide to lift a restriction on processing.

In some circumstances data subjects have the **right to object** to processing of their personal data, although there are a number of legitimate grounds on which Waterloo may not agree to this (e.g. to establish or defend a legal claim, or there are compelling grounds for the data processing).

## **Further information**

If you wish to raise a complaint about how we have handled your personal data, please contact our Data Protection Officer who will investigate the matter. Our Data Protection Officer can be contacted at Waterloo Housing Group, 1700 Solihull Parkway, Birmingham Business Park, Solihull, B37 7YD or email [Data Protection](#).

If you are not satisfied with our response or believe that we are not processing your data in accordance with the law you can complain to the Information Commissioner's Office (ICO). You can contact the ICO at the following address:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Please also see <http://www.ico.org.uk/>

## **Appendix- Data processors**

The following are third party data processors who act on our behalf to process customer personal data (including tenant/leaseholder/housing applicants). Please note that they may only process data on some customers, which will vary according to the purpose of the data processing. We may add or replace data processors from time to time.

Aaron Services Ltd  
Baker Goodchild  
Blue Square  
Capital Resolve  
Chubb  
Denniss & Marwood  
Door Security Systems  
EBS  
Fire Stop  
FIS Fire Industry Specialists  
G Harrison Buildrite  
Gelders Construction  
Homes Direct  
ISS Technical Services  
Jeakins Weir  
L Daniels  
Liberty Gas Ltd  
Marketing Means (UK) Limited  
Mitie Maintenance Ltd  
Morgan Lambert  
Novus Contractors  
Nvisage Limited  
Obam Lifts  
PCOL  
PJ Lilley Ltd  
Premier Gas  
Resource Print Solutions  
Squire Alarms  
Taylor Pearson (Construction) Ltd  
Tunstall  
Voicescape  
Woodlands Property Services Ltd