



## Privacy Notice – Housing Tenant Services and Buildings Maintenance

### Introduction

Housing Tenant Services and Buildings Maintenance have provided this privacy notice to help you understand how we collect, use and protect your information whilst we provide you with Landlord & Homeownership Services for your home.

The document below will describe how we may collect and process your personal information.

The purpose of this document is to clearly acknowledge the Council's responsibilities in relation to the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

### Definitions

**Personal Data** means any information related to an identified or identifiable natural (living) person ('**data subject**') i.e. a person that can be directly or indirectly identified by reference to a name, ID reference number, email address, location data, or physical, physiological, genetic, mental, economic, cultural or societal identifier

**Special Personal Data** previously known as 'sensitive personal data', relates to race, ethnic origin, politics, religion, trade union membership, genetic data, biometric data, health, sex life or sexual orientation. Records of criminal personal data must also be treated in a similar way.

**Data Controller** determines the purposes and means of processing personal data.

**Data Processor** is responsible for any operation which is performed on personal data on behalf of the controller e.g. collection, recording, organisation, structuring, storage, adaption or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or making available, alignment or combination, restriction, erasure or destruction.

**Third Party** is someone / somebody who is not the Data Controller, the Data Processor or the Data Subject.

### Who we are

We are your landlord and have a legal contract with you in the form of a Tenancy Agreement, Lease or Licence.

The Council is the 'data controller' for the information which is collated and processed. This means we are responsible for deciding how we can use your information. If you want more information regarding the services delivered, please go to our [website](#).

The Council regards lawful and correct treatment of personal information as critical to their successful operations, maintaining confidence between the Council and those with whom they carry out business. The Council will ensure that they treat personal information correctly in accordance with the law.

Services are provided to you under contractual and discretionary obligations.

The Data Protection Officer for ESC is Siobhan Martin, Head of Internal Audit, and can be contacted at [dataprotection@eastsuffolk.gov.uk](mailto:dataprotection@eastsuffolk.gov.uk)

### How the law protects you

UK GDPR says that we are allowed to use personal information only if we have a proper reason to do so. More information on how the law protects you can be found on the [East Suffolk website](#).

### Our Responsibilities

UK GDPR provides us with main responsibilities for processing personal data.

All personal information provided by you is held securely and in confidence by us in our computerised and other records. When we process your personal information, we do so in compliance with UK GDPR.

For further information on our responsibilities, please see the [East Suffolk website](#).

### Your Rights

The UK GDPR provides you with the following rights:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making
9. The right to withdraw consent
10. The right to complain

Requests in relation to your rights with regards to the personal data we hold should be made verbally or in writing to the Data Protection Officer.

For further information on your rights, please see the [East Suffolk website](#).

### Your responsibilities

You are responsible for making sure you give us accurate and up to date information, and to let us know if any personal information we hold is incorrect.

### When do we collect information about you?

We collect information about you from different places, including:

- Your Housing Register application
- Your Mutual Exchange application
- Your Home Ownership application

- Your HomeBuy application
- Directly from you
- Information from Suffolk County Council/Home Office/Department for Levelling Up, Housing and Communities in relation to Refugee's and Asylum Seekers

### **What information do we maintain?**

The information about you which we will maintain will include:

- Name of tenants
- Date of birth of tenants
- National Insurance Numbers of tenants
- Gender of tenants
- Photos of tenants
- Names of household members
- Date of birth of household members
- Gender of household members
- Address
- Contact telephone numbers
- Contact email addresses
- Bank account details for Direct Debit payments
- Income and expenditure in relation to rent arrears cases
- Correspondence address
- Religion
- Ethnic origin
- Sexual orientation
- Health data

### **How do we use your information?**

We will be using your information to:

- Manage your rent account using profiling software, but not automated decision-making software
- Maintain and repair your property
- Assess your shared ownership repair claim
- Manage your tenancy
- Manage Anti-Social Behaviour
- Target our financial inclusion work using profiling software, but not automated decision-making software
- Provide a secure tenants portal (myEastSuffolk/myHome) to allow you to view your rent account, log repair and self-serve on many aspects of tenancy management
- Contact tenants and leaseholders via letter, email, telephone call, text messaging and face-to-face for all aspects of tenancy and leasehold management
- Invite you to participate in specific trials of new Information and Communications Technology (ICT) and digital systems so we can improve the services that East Suffolk Council provides
- Under resettlement schemes for Refugees and Asylum Seekers.

We will not use your personal data for other purposes other than for what it

was collated unless we have obtained your consent or for other lawful purposes (e.g. detection and prevention of fraud).

We will always provide further information on the sharing of your data before we ask you to give consent for it to be used for other purposes e.g. for an ICT trial.

We do not use automated decision making.

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

We will hold your personal information for the entire time you are a tenant with us, and then for 6 years after your tenancy ends. This is in order to allow us to fulfil our obligations as your landlord and ensure any account information that is required for detailed tenancy references is still available for 6 years after your tenancy ends.

For Shared Ownership tenants, we will hold your personal information until East Suffolk Council no longer owns a percentage of your property.

Following this period, we will continue to keep a record indefinitely of tenants' names and addresses, legal action and any bad debts in order to prove tenancy history for you for references and Right to Buy applications. You can request that this historical personal information is deleted at any time, but should be aware that this means we will no longer be able to provide evidence of your past tenancies and you may be refused for a future tenancy with us as we will be unable to prove you kept to the terms and conditions of your tenancy.

### **Data Sharing**

We will share your personal information with:

- Contractors will receive your contact details in order to book appointments for repairs and maintenance.
- With contractors appointed by East Suffolk Council to review our procedures to ensure we are meeting our statutory obligations to maintain and repair your property.
- Mailing information is shared with print companies for the distribution of the tenant's magazine.
- External independent companies working on behalf of East Suffolk Council to collect Customer Satisfaction data such as tenant satisfaction surveys.
- Managing agents working on behalf of the Council will receive information relating only to those tenants whose properties they are responsible for managing, to allow them to manage on our behalf.
- With your consent, we share your information with utility companies in order to ensure you have accounts for all essential services of water, electricity and gas.
- External ICT contractors that provide hardware and software to the Council for the purposes of managing your tenancy.
- External partners or suppliers for the purpose of testing new or upgraded ICT systems and approaches so we can improve the services that we provide to you (more convenient, flexible, efficient, or cheaper to operate).
- Support providers, Registered Providers and third party private

landlords in relation to Refugee and Asylum Seekers Resettlement programmes.

- To ensure we deliver our statutory obligations, we will share information, where applicable, with the Suffolk Office of Data & Analytics for analytical purposes to support us in meeting our statutory functions.

#### **Transferring your information overseas**

Currently, we do not transfer any personal information outside of the European Economic Area (EEA).

#### **National Fraud Initiative (NFI)**

We may share information provided to us with other bodies responsible for auditing, or administering public funds, or where undertaking a public function, in order to prevent and detect fraud. For further information, see the [East Suffolk website](#).