

CROYDON CHURCHES HOUSING ASSOCIATION LIMITED

AND

CCHA DEVELOPMENTS LIMITED

CUSTOMER DATA PRIVACY NOTICE

How we use your personal information

Identity and Contact Details of Controller

Croydon Churches Housing Association Limited and ccha Developments Limited (“the Group”, “we”, “us”) is a controller of personal information for the purposes of the General Data Protection Regulation (‘GDPR’)¹. Our contact details for data protection purposes are as follows:

The Company Secretary

ccha
29 Sheldon Street
Croydon
CR0 1SS

The individual responsible for data protection compliance of the Group is the Company Secretary. The Company Secretary is contactable using the above contact details.

Purpose of this privacy notice

This privacy notice tells you what to expect when the Group processes personal information. It applies to information about applicants, residents and other service users. It tells you the purposes for which we may process your personal information and the legal basis for the processing (‘processing’ includes us just keeping your personal information). Data protection law says that we are allowed to use personal information only if we have a proper reason for doing so. The legal basis for processing your information is explained further below.

Why do we collect and store personal information?

We collect and process your information because you have given your consent or have entered or wish to enter into a contract (such as a tenancy agreement or other form of contract) with us. In addition, we may use personal information where it is our legal duty to do so or in the protection of someone’s life.

We need this information to be able to make sure we are able to provide a service to you, meet your accommodation needs and meet any individual needs you may have in terms of the way we communicate with you.

¹ By this we mean the Regulation as supplemented and amended by the Data Protection Act 2018

There will also be times when processing personal information is necessary for a legitimate interest pursued by ccha or a third party. Where processing is being carried out because of a legitimate interest. Some of the information that we hold will be with your consent. We will always make it clear when this is the case and explain how you can withdraw your consent.

Sometimes your information will have been provided to use by a third party because it is relevant to their, your or another person's circumstances. For example, information may have been provided to use by the resident of the home you live in or by a resident reporting antisocial behaviour.

Information we may hold about you and how we use it

The information we hold on our records concerns our relationship with you. For example:

- We hold names and dates of birth, photographic ID and information about your previous housing circumstances to assess housing applications and help prevent tenancy fraud.
- We hold contact details for you so we can communicate with you by your preferred means and keep you informed about services we offer which may be useful to you.
- We record information about your needs (for example, if you have a carer or social worker; if you need adaptations in your home; if you need large print or translated text) to ensure that we take account of any support needs in our dealings with you, and to improve our communications with you.
- We record information to enable us to provide housing management services. For example, we record reports of anti-social behaviour, complaints, change in circumstances (for example when your employment status changes etc.) and information about housing options (e.g., if you have a medical need which means you need to move).
- We keep financial records about the amount of money you have paid us; any amount(s) outstanding and action taken to recover money you owe.
- We may hold information about you if you are engaged with any additional guidance and support services. For example, in connection with access to training and employment we may hold information about your job history and skills and experience or if we support you to improve your financial circumstances, we may hold information about your household income and expenditure.
- We may record your telephone calls for training and monitoring purposes to ensure we are delivering a good service. Any call recordings will be held in accordance with our Corporate Retention Policy before being erased.

- We may capture your image on our CCTV systems if you visit a property, office or community facility which is covered by this facility. Any CCTV recordings will be held in accordance with our corporate data retention procedure before being erased.
- We also hold photographic imagery but will ask for your consent to do so.
- We record the findings of surveys and other research to help us improve our service to customers. The information you provide will be anonymous unless you agree that we can use your details.
- We keep details of concerns or complaints received to help us monitor responses and resolutions to any issues raised. The information you provide may need to be passed to third parties such as our repairs and estate maintenance contractors.
- Any record kept will be in accordance with our Corporate Data Retention Policy before being erased.

This list is not exhaustive, as we hold records of most contacts we have with you, or about you, and 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 (such as doctors and occupational therapists).

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.

How we manage your personal information

We process your personal information in accordance with the principles of GDPR.

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

- Processed for limited purposes.
- Kept up-to-date, accurate, relevant and not excessive.
- Not kept longer than is necessary.
- Kept secure.

Access to personal information is restricted to authorised individuals on a strictly need to know basis.

We are committed to keeping your personal details up to date, and we encourage you to inform us about any changes needed to ensure your details are accurate.

To help us to ensure the confidentiality of your personal information we may ask you security questions to confirm your identity when you call us. We will not discuss your personal information with anyone other than you unless you have given us prior written authorisation to do so or where our policy and procedures permit us to do so.

Periods for which we will store your personal information

We will only hold your records during the period of our relationship with you and for a set period afterwards as defined in our retention guidance. This is to allow us to meet our legal obligations including resolving any follow up issues between us (for example, if you live in one of our properties, we will hold information about you for the duration of your tenancy).

Sharing your personal information

We will only share your information where we are legally obliged and able to do so. For Example:

- To provide you with the services you require.
- To comply with the law (e.g., police, health authorities, inland revenue, government departments).
- Where there is a clear health and safety risk.
- Where we are requested to do so by another organisation in pursuit of its legitimate interests.
- Child protection and safeguarding issues.
- Where there is a clear risk to yourself, staff and others.
- To seek legal advice or in connection with court proceedings or statutory action to enforce compliance with tenancy conditions.
- For the detection and prevention of crime, prosecution of offenders and for the detection and prevention of fraud.
- Research company to carry out a survey to establish the quality of our services or work.
- The Housing Regulator/ Department for Levelling Up in relation to social housing lettings and sales for statistical purposes.

There are a number of organisations who we will share your information with because they provide services on our behalf. They will need to get in touch with you from time to time. Each of these organisations has signed up to a contract which sets

out our expectations in relation to them keeping your information safe and the data we share with them is the minimum they need in order to carry out the services.

We will not sell your personal information.

Your rights under the GDPR

You have a number of rights under the GDPR which are explained below:

Access to personal information

Under the GDPR, you have a right to ask us what personal information we hold about you, and to request a copy of your information. This is known as a 'subject access request' (SAR).

Rectification

If you need us to correct any mistakes contained in the information we hold about you, you can let us know by contacting your neighbourhood officer or alternatively contacting customer services at customers@ccha.biz

Erasure ('Right to be Forgotten')

You have the right to ask us to delete personal information we hold about you. You can do this where:

- the information is no longer necessary in relation to the purpose for which we originally collected/processed it
- where you withdraw consent
- where you object to the processing and there is no overriding legitimate interest for us continuing the processing
- where we unlawfully processed the information
- the personal information has to be erased in order to comply with a legal obligation

We can refuse to erase your personal information where the personal information is processed for the following reasons:

- to exercise the right of freedom of expression and information.
- to enable functions designed to protect the public to be achieved e.g., government or regulatory functions.
- to comply with a legal obligation or for the performance of a public interest task or exercise of official authority.
- for public health purposes in the public interest.
- archiving purposes in the public interest, scientific research historical research or statistical purposes.
- the exercise or defense of legal claims; or
- where we have an overriding legitimate interest for continuing with the processing

Restriction on processing

You have the right to require us to stop processing your personal information. When processing is restricted, we are allowed to store the information, but not do anything with it. You can do this where:

- You challenge the accuracy of the information (we must restrict processing until we have verified its accuracy)
- You challenge whether we have a legitimate interest in using the information
- If the processing is a breach of the GDPR or otherwise unlawful
- If we no longer need the personal data but you need the information to establish, exercise or defend a legal claim.

If we have disclosed your personal information to third parties, we must inform them about the restriction on processing, unless it is impossible or involves disproportionate effort to do so.

We must inform you when we decide to remove the restriction giving the reasons why.

Objection to processing

You have the right to object to processing where we say it is in our legitimate business interests. We must stop using the information unless we can show there is a compelling legitimate reason for the processing, which override your interests and rights, or the processing is necessary for us or someone else to bring or defend legal claims.

Withdrawal of consent

You have the right to withdraw your consent to us processing your information at any time. If the basis on which we are using your personal information is your consent, then we must stop using the information. We can refuse if we can rely on another reason to process the information such as our legitimate interests.

Right to Data Portability

The right to data portability allows us to obtain and reuse your personal data across different services. It allows us to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way. The right only applies to personal data you have provided to us where the reason we are relying on to use the information is either your consent or for the performance of a contract. It also only applies when processing is carried out by us using automated means.

Changes to this privacy notice

We keep our privacy notice under regular review and will place any updates on our website; you will be notified of any major changes to this notice.

Further information

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

The Company Secretary

ccha
29 Sheldon Street
Croydon
CR0 1SS

The Information Commissioner's Office (ICO) is also a source of further information about your data protection rights. The ICO is an independent official body, and one of their primary functions is to administer the provisions of the GDPR.

You have the right to complain to the ICO if you think we have breached the GDPR.

You can contact the ICO at:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

0303 123 1113

<http://www.ico.org.uk/>

Version History	
Version Code	4.0
Version Issued	June 2021
Version Replaced	3.0
Lead Officer	Company Secretary
Date of Issue	May 2018
Review Date	Reviewed and updated November 2022 in light of further transparency and Tenant Satisfaction Measures