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", "ccha", "we", "us") is a controller of personal data for the purposes of the UK data protection legislation[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 for 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 data. It applies to data about applicants, residents, and other service users. It tells you about the purposes for which we may process your personal data 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 data only if we have a proper reason for doing so. This legal basis for processing your data is explained further below.

We process customer personal data only where we have a valid legal basis under UK GDPR. Depending on the purpose of processing, these bases may include the performance of a contract, compliance with a legal obligation, our legitimate interests, your consent, the protection of vital interests, or the performance of a task carried out in the public interest. We will always identify and document the appropriate legal basis before processing personal data.

[1] By this we mean the UK Data Protection Regulation (UK GDPR), the Data Protection Act 2018(as amended), and the Data (Use and Access) Act 2025 (DUAA).

Processing activity	Lawful basis (UK GDPR Article 6)	Why we process the data
Providing products and services to customers	**Contract** (Art. 6(1)(b))	To fulfil our contractual obligations, deliver products and services, manage accounts, process orders and provide customer support
Processing payments, billing and debt recovery	**Contract** (Art. 6(1)(b)) and/or **Legitimate Interests** (Art. 6(1)(f))	To receive payment for services, maintain financial records and recover outstanding debts
Customer enquiries and communications	**Contract** (Art. 6(1)(b)) or **Legitimate Interests** (Art. 6(1)(f)	To respond to enquiries, provide information, resolve issues and maintain effective customer relationships
Compliance with legal and regulatory requirements	**Legal Obligation** (Art. 6(1)(c))	To comply with applicable laws and regulations, including tax, accounting, anti-fraud, anti-money laundering, consumer protection and regulatory reporting requirements
Account management and service improvement	**Legal Obligation** (Art. 6(1)(c))	To comply with applicable laws and regulations, including tax, accounting, anti-fraud, anti-money laundering, consumer protection and regulatory reporting requirements
Account management and service improvement	**Legitimate Interests** (Art. 6(1)(f))	To administer customer accounts, improve services, analyse customer interactions and enhance customer experience.
Fraud prevention and security monitoring	**Legitimate Interests** (Art. 6(1)(f)) and/or **Legal Obligation** (Art. 6(1)(c))	To detect, prevent and investigate fraud, cyber threats, unauthorised access and other unlawful activities
Direct marketing to existing customers	**Legitimate Interests** (Art. 6(1)(f)) or **Consent** (Art. 6(1)(a)) where required	To provide information about products, services, events and offers that may be of interest to customers
Marketing to prospective customers	**Consent** (Art. 6(1)(a)) or **Legitimate Interests** (Art. 6(1)(f)) where permitted by law and	To promote our products and services and develop new business opportunities.

	customers can opt out	
Customer satisfaction surveys and feedback	**Legitimate Interests** (Art. 6(1)(f))	To understand customer needs, assess satisfaction levels and improve our services
ASB, safeguarding investigation Or Police investigation	**Legitimate Interests** (Art. 6(1)(f))	To protect residents, customers, staff, property and wider community and to investigate complaints and incidents.
Sharing ASB, safeguarding information with police or local authorities or other agencies where necessary	**Legitimate Interests** (Art. 6(1)(f)) or **Recognised Legitimate Interest** (crime prevention/ public security where applicable)	To prevent crime, protect individuals and support multiagency responses to antisocial behaviours
Processing ASB or safeguarding information to comply with statutory duties as a landlord	**Legal Obligation** (Art. 6(1)(c))	To comply with legal and regulatory responsibilities relating to community safety, tenancy management or safeguarding

Special Category Data

Where we process special category data relating to customers (for example health information, biometric data, or information revealing racial or ethnic origin), we will identify:

- A lawful basis under Article 6 UK GDPR; and
- An additional condition for processing under Article 9 UK GDPR, such as explicit consent, provision of health or social care, legal claims, substantial public interest, or vital interests.

Why do we collect and store personal data

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

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

Data we may hold about you and how we use it

The data we hold in our records concern our relationship with you. For example:

- We hold names and dates of birth, photographic ID and data 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 data 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. ccha may process special category personal data in accordance with Article 9 of the UK GDPR and Schedule 1 of the Data Protection Act 2018 where there is a lawful basis to do so: where a customer is also an employee, where the processing is necessary to meet , legal obligations, for reasons of substantial public interest (with the relevant Schedule 1 condition identified and the appropriate policy document referenced where required), safeguarding or explicit consent.
- We record data to enable us to provide housing management services. For example, we record reports of anti-social behaviour, complaints, changes in circumstances (for example when your employment status changes etc.) and data 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 the money you owe.
- We may hold data 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 data about your job history and skills and experience or if we support you to improve your financial circumstances, we may hold data 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 data retention schedule 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 data retention schedule 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.
- We keep details of concerns or complaints received to help us monitor responses and resolutions to any issues raised. The data 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 adopted data retention schedule 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 data so we can deliver services to you. Generally, the data we hold will have been provided by you (on application or enquiry forms or when we communicate with you), but we may also hold data 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).

How we manage your personal data

We process your personal data in accordance with the principles of the UK GDPR. We take our data protection responsibilities seriously and maintain appropriate records, controls and governance arrangements to demonstrate compliance with data protection law.

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

- Processed lawfully, fairly, and transparently;
- Only processed for explicit and legitimate purposes;
- Limited to what is relevant and necessary for the purpose it was collected for;
- Kept up-to-date, accurate, and relevant;
- Not kept longer than is necessary;
- Kept secure.

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

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

To help us ensure confidentiality of your personal data, we may ask you security questions to confirm your identity when you call us. We will not discuss your personal data 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 data

We will only hold your records during the period of our relationship with you and for a set period afterwards as defined by law or n our Data Retention Schedule. 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 data about you for the duration of your tenancy).

Sharing your personal information

We may share data where legally required, permitted, or necessary for stated purposes.

. 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 or our services or work
- The Regulator of Social Housing/ Ministry of Housing, Communities and Local Government in relation to social housing lettings and sales for statistical purposes.

There are organisations who we will share your data with because they provide services on our behalf

- Repairs KNK
- Gas/ Electrical services Smith and Byford

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 data safe and the data we share with them is the minimum they need to carry out the services. ccha remains the Data Controller.

We will not sell your personal information.

Your rights under the UK GDPR

You have several rights under the UK GDPR which are explained below:

Be informed

You have the right to be informed of the collection and use of your personal data, which is provided within this Privacy Notice.

Access to personal information

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

Rectification

If you need us to correct any mistakes contained in the data we hold about you, you can let us know by contacting Customer Service Customers@ccha.biz (we may ask you to confirm in writing)

Erasure ('Right to be Forgotten')

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

- The data 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 data must be erased to comply with a legal obligation

We can refuse to erase your personal data where the personal data 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 in 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 data (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 UK GDPR or otherwise unlawful
- If we no longer need the personal data, but you need the data to establish, exercise or defend a legal claim.

If we have disclosed your personal data 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 data unless we can show there is a compelling legitimate reason for the processing, which overrides 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 data at any time. If the basis on which we are using your personal data is your consent, then we must stop using the information. We can refuse if we can rely on another reason to process

the data such as our legitimate interests. Please note that withdrawing your consent does not invalidate processing that occurred whilst consent was valid.

Right to data portability

The right to data portability allows you to obtain and reuse your personal data across different services; you have the right to ask us to share this data direction with another controller.

However, this right only applies where the lawful basis for processing is consented or necessary to fulfil a contract with you and is carried out by automated means. Additionally, personal data can only be provided in a structured, commonly used, and machine-readable format, and data can only be transmitted to another controller where technically feasible.

Right to be free from automated decision making

You have the right to not be subject to decisions based solely on automated decision making, including profiling, that produces significant legal or similar effects concerning you.

We can only carry out automated decision making where the decision is:

- Necessary for the performance of a contract; or
- Authorised by domestic law applicable to the controller; or
- Based on your explicit consent

Right to complain

Under the Data (Use and Access) Act 2025, you have the right to complain directly to us if you are unhappy with the way we have handled your personal data. Our **Data Complaint Form** can support you. Contact customers@ccha.biz We will acknowledge your data complaint without undue delay and, in any event, within 30 calendar days of receipt of your request.

Timeframes for response

If you exercise any of the rights outlined above, we will respond as quickly as possible and in any event, within one calendar month from the receipt of your request. If we require additional information to deal with your request, for example ID, the time limit will begin once this has been received. If your request is complex or you make multiple requests, the response time may be a maximum of three calendar months.

If we are unable to resolve your complaint, you have the right to escalate your complaint to the Information Commissioner's Office using the details below:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF Telephone 0303 123 1113

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 data you can contact us using the details below:

The Company Secretary
ccha
29 Sheldon Street
Croydon
CR01SS

Version History	
Version Code	5.0
Version Issued	June 2026
Version Replaced	4.0
Lead Officer	Company Secretary
Date of Issue	Reviewed June- August 2026 in line with Data (Use and Access) Act 2025
Review Date	August 2029