

PRIVACY NOTICE

1. About us

Together Housing Association Limited is a charitable community benefit society, registered in England and Wales at the Financial Conduct Authority with registered number 28687R. Our registered address is: Together Housing Association Limited, Bull Green House, Bull Green, Halifax, HX1 2EB.

Together Housing Association is responsible for collecting, processing, storing and safe keeping of personal information as part of our business activities. We manage information in accordance with the UK General Data Protection Regulations (UKGDPR) and the Data Protection Act 2018.

If you have a query about this notice or about your personal data you can contact our Data Protection Team at data.protection@togetherhousing.co.uk

2. About this notice

This notice sets out our approach to how we use and protect the personal information which you provide us.

We take your privacy and the security of your information seriously. We understand that when you give us your personal information you want to ensure that it is kept private and secure. To do this we have adopted a range of measures including policies and procedures that set out our approach to data protection and information security, and have implemented organisational and technical controls to protect and safeguard personal information.

The information we hold about you may vary depending on what services we are providing to you. Personal information will only be collected, created or otherwise obtained for specific, explicit and legitimate purposes and will not be used for any other incompatible purpose.

Together Housing promises:

- To be transparent about what we do with your personal data and keep you informed.
- To respond to any of your requests in a timely and effective manner.
- To respect your rights and process your information lawfully, ethically and securely.
- Never to sell your personal data.

3. About the information we collect

We collect information about you when you make an application with us for a tenancy, home purchase or shared ownership or a referral is made by you for one of our services.

We may also collect information when you voluntarily complete customer surveys, provide feedback or where there is general correspondence. Further information may be collected during your tenancy.

The table below sets out what personal data we process, our purpose for doing so, our lawful justification and how long we keep it for.

What personal data we process	Our purpose for doing so	Our lawful justification	How long we keep it for
Details about you and your children, including name, date of birth, address, contact details, identification (including National Insurance number), documents provided to us & employment details	Allocating homes, managing our services, managing your tenancy with us, identifying you are who you say you are	Performance of a contract, legitimate Interest	Usually 6 years after the end of your tenancy, although some information may be kept to fulfil certain legal obligations
Details about your home, household and your housing needs and tenancy agreement	Allocating homes, managing our services, managing your tenancy with us, providing repairs	Performance of a contract, legitimate interest	Usually 6 years after the end of your tenancy, although some information may be kept to fulfil certain legal obligations
Welfare benefit referrals, housing benefit notifications, rent statements	Administration of the contract and managing your tenancy with us	Performance of a contract, legal obligation, legitimate interest	2 years, although further information is kept to fulfil certain legal obligations
Details about your home when you apply to shared ownership	Allocated shared ownership homes	Legitimate interest	6 years following the end of the tenancy, although further information is kept for legal record keeping purposes
Right to buy information	Records necessary for Right to Buy properties	Legal obligation,	12 years after completion

What personal data we process	Our purpose for doing so	Our lawful justification	How long we keep it for
		legitimate interest	
Rent and service charge information, including details of any arrears	Allocating homes, managing our services, making financial arrangements related to your home (setting up council tax payment), informing relevant local authority departments, managing your tenancy with us	Performance of a contract, legitimate interest	6 years following the end of the tenancy
Financial information, including income details, bank details, housing benefit information & any guarantor details	<p>To make financial arrangements related to your home, such as to enable automatic rent payment through direct debit or housing benefit payments, set up your council tax payments or deal with any mortgage arrangements</p> <p>To set up arrangements relating to your home, such as informing the Local Authority departments of your tenancy arrangements for council tax and housing benefit purposes</p> <p>To help other people or companies to provide services or utilities to your home or to contact you. This may include where they need to contact you when you first move in to set up payments or about any unpaid bills while you live at your home and/or after you leave your home</p>	Performance of a contract, legal obligation, legitimate interest, consent	6 years following the end of the tenancy
Credit checks	Assessing your financial viability for certain types of tenancy, or for when you wish to buy your home	Performance of a contract	3 months
References received about you (e.g. from your employer or previous landlord)	Allocating homes, managing our services, administration	Legitimate interest	3 months

What personal data we process	Our purpose for doing so	Our lawful justification	How long we keep it for
Medical information & emergency contact details, next of kin/ advocate, information about any accidents or incidents which involve you or your home	<p>To provide information to our staff to enable them to deliver services to you to meet your needs and to train and protect them where necessary</p> <p>To deal with any medical or other emergencies and to carry out your wishes or requirements such as any religious or cultural wishes</p> <p>To act in someone's best interests such as where we have concerns about a person's health or welfare and may need to involve agencies such as Social Services or the police</p> <p>To support you in your tenancy and meet our obligations as a registered social landlord</p>	Law protecting vital interests in extreme circumstances	6 years following the end of the tenancy
Information about any complaints made by you or which relate to you	To handle any complaints	Legitimate interest	Resolution of the complaint plus 6 years
The way in which you conduct your tenancy if you are in breach of your tenancy conditions	To respond to any breach of our tenancy conditions	Legitimate interest, contract	Resolution of the breach plus 6 years
Information regarding your marketing preferences	To deliver marketing materials such as our newsletters or make note of particular preferences	Consent, legitimate interest, legal obligation	Refreshed every year
Any photographs taken of you or your property	Monitoring defects, assessing any health & safety risks, administering tenancies and security	Legitimate interest	In line with legal obligations and defects periods
Any marketing materials/photos taken at events	To promote our services	Consent, legitimate interest	3 years, unless you give us specific consent to continue use after this time

What personal data we process	Our purpose for doing so	Our lawful justification	How long we keep it for
Ethnicity data, sexual orientation and religious beliefs	To ensure fair and equal access for all to our services To help us put together statistics to give to our regulator or other government organisation	Explicit consent for equal opportunities monitoring, legal obligation	Lifetime of tenancy
Convictions, proceedings and criminal acts	To respond to legal claims, to deliver our services, safeguarding, the apprehension or prosecution of offenders	Social protection law, legal obligation, employment law, prevention and detection of crime	Tied to the length of the tenancy, 6 years following the end of the tenancy
Call recordings	For training, monitoring and our mutual protection in the event of a dispute	Legitimate interest	6 months following recording
CCTV footage	For the prevention and detection of crime	Legitimate interest	28 days following recording, unless specifically required for evidential purposes

If we deem there to be a risk to our staff, we may place a flag over your tenancy. When we do so, we will inform you and ensure that these flags are regularly reviewed.

We may keep some of your information longer than the periods listed above. This will be to satisfy our legal obligations and maintain certain records where appropriate to do so under our legitimate interest.

We also maintain a Retention Schedule, detailing how long we keep all items of information beyond those listed above. This is available to view on request.

Our Legitimate Interests

A legitimate interest means that we need to process information necessary for Together Housing's business or commercial interest. When we rely on any legitimate interest, we will ensure that we take a balanced approach and have appropriate safeguards in line with our expectations.

Our legitimate interests include:

- Having appropriate security, for our offices and on our sites. This includes CCTV and identification photographs.
- Handling and investigating complaints.
- Keeping our records up to date.
- Collecting unpaid debt.
- Recording threatening behaviour.
- Appending data from other sources.
- Official communications.
- Keeping our records up to date, working out which of our products and services may interest you and telling you about them.
- Seeking your consent when we need it to contact you.
- Sharing your information with utilities providers in the event of unpaid debts.
- Processing for business efficiency purposes and enabling services to be provided.
- Analyses for business insight, planning and future organisational service or development requirements.

How will we collect this information?

Information will be collected from you personally when you enter into an agreement/contract with us. This will be in the form of applications and any other forms which may be completed electronically or written in order to apply for one of our properties, become a tenant, to manage your tenancy or when requesting a repair or support service from us.

It is possible that we will receive referrals containing your information from public bodies such as local councils, but this should be done with your knowledge of why they are making the referral to our services. This information may be within the public body's privacy notice.

We may generate further personal data regarding our tenants during the course of the tenancy. This could be in the form of general correspondence, or this may need to be generated to satisfy our statutory obligations. An example of Together Housing fulfilling its statutory obligations and potentially collecting personal data would be where photographs of properties are required for the purposes of monitoring defects or for assessing any health and safety risks.

Contractors, suppliers and other third parties

Information collected and processed relates to basic contact details and any other information they may share in routine correspondence with us.

General enquiries and other information received

Together Housing may collect and retain information voluntarily sent by the data subject and not caught by any other section within this notice.

This information will be processed, stored, retained and shared where relevant and appropriate to do so for the purpose of responding to or managing any general enquiries or other information received, volunteered or sent to us by the data subject that is or may be connected to any of our activities. This information will be processed in accordance with your rights and our obligations as detailed under data protection law and the general principles contained within our Data Protection Policy and privacy notices.

4. Sharing your personal information

Who we share your information with	The purpose for sharing it	Our justification for sharing
Companies which provide services or utilities to your home (such as gas, electric or water companies) and the relevant Council Tax Department	Payment of these services, debt recovery, fraud investigations	Legitimate interest, legal obligation
People who provide services on our behalf, such as a managing agent, contractors carrying out repairs	Fulfilling the tenancy agreement	Legitimate interest
A credit checking agency, your bank and mortgage company or other financial institutions and (where necessary) a debt collection and/or tracing agency	Allocating and administering properties and tenancy agreements, fraud investigations, debt recovery	Performance of a contract, legitimate interest
Resident representatives involved in scrutinising our services and board members involved in our complaints process	To improve our services	Legitimate interest
A doctor, hospital, paramedic or health worker	Where you require medical attention and	Consent, social protection laws, vital interest

Who we share your information with	The purpose for sharing it	Our justification for sharing
	are unable to provide the information yourself	
Our legal advisors, the courts and the police (this may include information about antisocial behaviour)	Reducing ASB and fraud, the prevention and detection of crime	Legitimate interest
People or agencies who provide services to you or who work with us to provide services to you, such as your care/support provider	To deliver services	Legitimate interest, consent
The bodies involved with your care/support such as the relevant Local Authority departments, or Social Services and any alarm call centre	To deliver services	Legal obligation, legitimate interest
Our regulator or other bodies which look at how we provide services as your landlord and other people where we are legally required to provide information to them	Legally required	Legal obligation
Your next of kin or other people acting on your behalf in an emergency, where you have requested this	When the information is requested	Consent
To another landlord or housing association where you are looking to move or exchange your property (e.g. where they request your details and/or a reference from us)	When the information is requested	Consent, legitimate interest
Relevant Local Authority departments (including housing benefit, council tax, elections, adult services, fraud teams etc)	Legal requirement	Legal obligation
To relevant people and authorities such as the police, adult and child protection and social services This may include sharing information when we have concerns about a person's health or welfare or where there are investigations being carried out, such as sharing information in a case conference with such bodies and other parties involved (such as teachers, nurses, etc.) or where we have concerns about possible criminal activity	Social protection, prevention and detection of crime, safer communities, reduction in ASB	Social protection law, the prevention and detection of crime, community safety partnerships
Companies who process information on our behalf such as an external mailing company (who send out our newsletter),	To enhance and deliver our services, maintaining records	Legitimate interest

Who we share your information with	The purpose for sharing it	Our justification for sharing
our archiving company, our confidential waste disposal company, providers of our information technology services or software		

International Transfers

Together Housing will not usually transfer your information outside of the United Kingdom, however we may use cloud storage technologies or software with servers located outside the UK.

Where we do transfer your personal data internationally, we ensure adequate safeguards are in place to offer you the same level of protection provided by UK data protection law. This may include standard contractual clauses, UK adequacy decisions or other specific international regulations.

5. Keeping your information secure

We store the information you provide us electronically on secure servers. We implement security policies, processes and technical security solutions to protect the information you provide from:-

- Unauthorised access
- Improper use or disclosure
- Unauthorised modification
- Unlawful destruction or accidental loss

When you contact us, we may ask you to provide some information so that we can confirm your identity. If other people (e.g. family members, support workers, solicitors etc) act on your behalf we will take steps to ensure that you have agreed for them to do so. We do this to protect your information and ensure that other people cannot find out things about you that they are not entitled to know.

We will ensure that our staff and other third parties, who may have access to your information or who process it on our behalf, are appropriately trained and can apply effective safeguards in keeping your information secure.

Automated Decision Making and Profiling

We do not make any decisions about you using automated means. An automated decision is one that is made by a computer algorithm that has no human intervention, for example an online credit card application is an automated decision made about you.

6. Your Data Protection Rights

You have the following rights regarding your personal data.

Right	Description of right	How we comply with this right
Right to be informed	Individuals have the right to be informed about the collection and use of their personal data	<p>We will provide privacy notices (such as this privacy notice) where we collect your personal data</p> <p>You can request a copy of this privacy notice if you wish</p>
Right of access	You have the right to obtain confirmation from Together Housing as to whether or not personal data concerning you are being processed, and, where that is the case, access to that personal data	<p>We will provide a copy of any personal data belonging to you, or specific personal data if you so require it. This will not include the personal data of any other individuals or information regarding how we operate</p> <p>We may redact information where exemptions apply and as permitted by data protection laws. We will tell you what information has been redacted unless this jeopardises a criminal or other lawful investigation</p>
Right to rectification	<p>You have the right to request Together Housing to rectify inaccurate personal data concerning you</p> <p>Taking into account the purposes of the processing, you have the right to have incomplete personal data completed by providing a supplementary statement</p>	<p>This will only apply to inaccurate personal data, information contained on your application form or any flags placed on your record</p> <p>This will not lead to any personal data which you disagree with being rectified</p>
Right to erasure (right to be forgotten)	<p>You have the right (under certain circumstances, but not all) to request Together Housing to erase personal data concerning you</p> <p>This will never include current tenancy details as necessary to fulfil our contractual obligations, or any information we are</p>	<p>The right to be forgotten only applies:</p> <ul style="list-style-type: none"> • Where the personal data is no longer necessary • If you withdraw consent • If we unlawfully held your personal data • If you successfully object to our processing • If we have to follow a legal obligation to delete

Right	Description of right	How we comply with this right
	required to process under law	
Right to restriction of processing	You have the right (under certain circumstances, but not all) to request Together Housing to restrict processing of your personal data; for example, you may request this if you are contesting the accuracy of personal data held about you	<p>This right only applies:</p> <ul style="list-style-type: none"> • Where you dispute the accuracy of any personal data until it has been made accurate • Where you have objected to any processing whilst we present our evidence • If we are processing anything unlawfully and you do not wish for it to be erased • If we no longer need the personal data but you require the data to establish, exercise or defend a legal claim
Right to data portability	<p>You have the right (under certain circumstances, but not all) to request Together Housing to provide you with the personal data about you which you have provided to us in a structured, commonly used and machine-readable format</p> <p>You also have the right to request Together Housing to transmit those data to another controller</p>	<p>This right only applies to data collected by automated means</p> <p>As Together Housing does not currently undertake processing which is wholly automated, we do not see any circumstances in which we would have to comply with this right</p> <p>For a copy of your personal data, please carry out a subject access request instead</p>
Right to withdraw consent	<p>If the lawful basis for processing is consent, you have the right to withdraw that consent</p> <p>If you wish to withdraw your consent, contact us immediately</p>	<p>Withdrawing consent will not affect the legality of any processing carried out where consent was given</p>
Right to object to direct marketing	<p>Where your personal data are processed for direct marketing purposes, you have the right to object at any time to processing of your personal data for marketing, which includes profiling to the extent that it is related to such direct marketing</p>	<p>This right will apply instantaneously in most instances</p> <p>If you would still like to receive marketing in one particular medium, please let us know</p> <p>Together Housing still reserves the right to contact you regarding important matters unrelated to marketing i.e. chasing rent arrears</p>

Right	Description of right	How we comply with this right
Rights in relation to automated decision making and profiling	Together Housing does not perform any automated decision-making based on personal data that produces legal effects or similarly significantly affects you	Together Housing does not carry out any automated decision making based on profiling Where profiling is carried out without automated decision making, we will update our privacy notices where necessary

If you would like to exercise any of these rights, please email:
data.protection@togetherhousing.co.uk

For more information about any of your rights, please visit:
<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

Required Information

The provision of some items of personal data is a condition of your tenancy with us. Mandatory information is however kept to a minimum wherever possible. If you don't want to provide this information to us it's likely we won't be able to offer you a tenancy.

Changes

We will notify you of any changes to this privacy notice.

Contacting us

If you are a Together Housing customer, our customer service team will be able to help you with most queries and requests you may have. If you want to contact us specifically about the privacy of your personal information or to make a subject access request, you can send your request to:
data.protection@togetherhousing.co.uk

Or in writing to:-

Data Protection Team
Together Housing Association
Bull Green House
Bull Green
Halifax
HX1 2EB

Questions and complaints

If you feel that our handling of your personal data under this notice and/or your right to privacy has been compromised, you should contact us at the address above.

If you are not satisfied with our response you have the right to lodge a complaint with the Supervisory Authority and the right to a judicial remedy. In the United Kingdom this is:

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

(tel) 0303 123 1113

(email) casework@ico.org.uk

Keeping this notice updated

We keep our privacy notice under regular review.

This privacy notice was last updated in August 2021.