

PRIVACY NOTICE (GATEWAY)

Here at Citizen Housing Group Ltd (Citizen), we take your privacy seriously. Below, we detail what information we collect, why we collect it, who we share it with and how we safeguard it. We will only use your personal information to administer your tenancy; however, we will share it with appropriate third parties.

For some information, we do not need to seek your consent to hold or process as it is part of our performance of a contract. We obtain your personal identifiable information in order to conduct our normal business operations as a Registered Social Housing Provider. We provide more than just a home and therefore if you agree, we will ask you to give us information where we can provide money/debt advice and optional help in seeking employment.

Citizen will never sell your information to third parties. For the purpose of this privacy notice we are the “controller” of your personal identifiable information as we determine the purposes and content of this information and the methods of processing. As a Registered Social Housing Provider, we are regulated by the Regulator of Social Housing (RSH)

What information we collect, why we collect it, the legal basis for doing so, and how long for:			
What	Why	Basis	Retention
Contact information <ul style="list-style-type: none"> • Name • Date of birth • Previous address • IP (Internal Protocol) address • Telephone numbers • Email address • Photographic image • Digital (CCTV) image • Door entry data 	Your tenancy agreement is a contract between you, any other person in your household (should you hold a joint tenancy) and Citizen. This data is used to set up and maintain and your tenancy account with us We use your photographic and digital (CCTV) image for identification purposes including subletting. We use this data to monitor your movements within the Gateway facility	B	Life of tenancy + 6 years after tenancy ends
<ul style="list-style-type: none"> • National insurance number • Financial information 	To assess your benefit entitlement and council tax. To assure ourselves you can sustain a tenancy and that you have the right to rent, as laid down by regulation. To give money and/or debt advice, if you agree, to help you maximise your income, prioritise spending and optional help in seeking employment.	B	NI number – life of tenancy/ Financial information 6 months
Details of unspent convictions/ criminal offences attracting a custodial sentence/on a register/person of interest	We use unspent conviction information to house you appropriately.	B	Life of tenancy but regularly reviewed. If no issues when conviction

			spent data will be deleted after 1 year following suspension
<ul style="list-style-type: none"> • Details of any support needs you have • Details of those people providing additional support • Next of kin details/emergency contacts • Disability information 	As required by our regulator and to provide information on extra services we provide – such as tenancy support.	B	Life of tenancy but regularly reviewed
<ul style="list-style-type: none"> • Details of alcohol, prescription or other drug usage 	We use this information to help us carry out self and well checks, and keep you and our staff from harm.	D	Life of tenancy but regularly reviewed
<ul style="list-style-type: none"> • Reason for being homeless 	We use this information to help us sign post and support you to prevent a re- occurrence of homelessness.	F	Life of tenancy plus 6 years
<ul style="list-style-type: none"> • Authority to Act or Power of attorney 	We use this information to ensure we deal with the most appropriate person dealing with your affairs	B	Life of tenancy but regularly reviewed
<ul style="list-style-type: none"> • Proof of right to rent 	This is required to comply with Immigration Act 2014 and regulatory compliance.	C	Life of tenancy
<ul style="list-style-type: none"> • Ethnicity • Religion • Sexuality 	For analysis purposes, as required by our regulator and to provide information on extra services we provide.	B	Destroyed after data is recorded
<ul style="list-style-type: none"> • Call Line Identification 	Your number is displayed on our telephones unless suppressed by yourself on your device. We hold a log of the phone number, date, time, duration of call and recording of conversation.	F	3 months from the date on telephone call

Types of Legal Basis

A – Consent	B – Contract	C – Legal obligation	D – Vital interests	E – Public task	F – Legitimate interest
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If you give us emergency contact details or next of kin information we require you to inform them that we hold their information. We have a contractual requirement to collect and process this information, as part of the provision of service to you.

Who do we **share** your data **with**?

Some data, such as your name, address, move-in date and national insurance number will be shared with local authorities to assess your benefit entitlement and council tax. We also share information relating to the protection of vital interests such as safeguarding, domestic violence, criminal activity & emergency services. Please see attached full list <https://www.citizenhousing.org.uk/privacy>

How we **keep** your data **safe**?

The organisation takes the security of your data seriously. The organisation has internal policies and controls in place to safeguard that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties. Where the organisation engages contracted third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

How we **obtain** your data

We obtain personal identifiable information by various means, this can be face to face, by email, by telephone, correspondence or by receiving information from others, for example local elected members who are representing you, police, health or social care agencies and benefit agencies. For a full list please see <https://www.citizenhousing.org.uk/privacy>

Where we share information with contracted third parties, we do so safely and via secure networks. This may be encrypted emails, or via secure portals into our network.

Your **rights**

Under the General Data Protection Regulations (GDPR), you have the right to be informed about how we use any data you provide: what data we collect, why, who has access to it, how long it's kept, and the legal basis we have for doing so. In certain circumstances we may need to request your consent to collect and use your data, but in those cases, you have the right to object and withdraw that consent just as easily as it is given. Should you not wish to provide your consent, any services directly related to this data cannot be provided.

You have the right to have your personal data removed where there is no legal basis for us to hold it, as well as the right to request your data is transferred to a third-party (data portability). Any automated decision making, based on your data, can be challenged and a human decision made. Additionally, you have a right of access and can request a copy of any personal data provided, and subsequently the right of rectification of any incorrect data identified. Visit the data protection page on our website to see more information about your rights. To exercise any of the above rights please contact Citizens Data Protection Officer (Mr Shane Murphy) on the address below. Overall responsibility for management of your data resides with Citizens senior information risk owner (Mr Ian Tinsley) at Citizen Housing Group Ltd, 4040, Solihull Parkway, Birmingham Business Park, Birmingham, B37 7YN or dataprotection@citizenhousing.org.uk

Complaints can be lodged with the supervising authority at The Information Commissioner's Office: <https://ico.org.uk/concerns> or 0303 123 1113.