

## PRIVACY NOTICE (ALL CITIZEN HOUSING CUSTOMERS)

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 it 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 Housing Group Ltd 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).

<b>What information we collect, why we collect it, the legal basis for doing so, and how long for:</b>			
<b>What</b>	<b>Why</b>	<b>Basis</b>	<b>Retention</b>
Contact information <ul style="list-style-type: none"> <li>• Name</li> <li>• Date of birth</li> <li>• Previous address</li> <li>• IP (Internal Protocol) address</li> <li>• Telephone numbers</li> <li>• Email address</li> </ul>	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 your tenancy account with us.	B	Life of tenancy + 6 years after tenancy ends
<ul style="list-style-type: none"> <li>• National insurance number</li> <li>• Financial information</li> <li>• Identification</li> </ul>	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 & identification – 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"> <li>• Details of any support needs you have</li> <li>• Details of those people providing additional support</li> <li>• Next of kin details/emergency contacts</li> <li>• Disability information</li> </ul>	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"> <li>• Authority to Act or Power of attorney</li> </ul>	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"> <li>• References from previous landlords</li> </ul>	We use this information to provide you with support	B	Deleted after 1 year of tenancy being granted
<ul style="list-style-type: none"> <li>• Proof of right to rent</li> </ul>	This is required to comply with Immigration Act 2014 and regulatory compliance.	C	Life of tenancy
<ul style="list-style-type: none"> <li>• Ethnicity</li> <li>• Religion</li> <li>• Sexuality</li> </ul>	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"> <li>• Details of who is living with you</li> </ul>	Used to ensure you are not overcrowded or under-occupying a property.	B	Life of tenancy but regularly reviewed
<ul style="list-style-type: none"> <li>• Call Line Identification</li> </ul>	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 date of telephone call

### Types of Legal Basis

<b>A</b> – Consent	<b>B</b> – Contract	<b>C</b> – Legal obligation	<b>D</b> – Vital interests	<b>E</b> – Public task	<b>F</b> – Legitimate interest
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Where someone sharing a home with you is over 14 years of age, and where you provide 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 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](mailto: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.