

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 use your personal information to administer your tenancy and to provide appropriate support and advice, and place you in contact with organisations of your choice, that will offer support that you control; however, we will share it with appropriate third parties where there is a legal justification. The Purposes for which we collect your personal data include the following:

- Regulatory purposes - e.g. requirements of the Regulator for Social Housing research;
- Management of homes;
- Collection of rents, other sums and receipt of benefits;
- Money/debt advice and employment;
- Maintenance and repair of homes;
- SHDF Wave 2.1 (Social Housing De-carbonisation Fund Wave 2.1) grant process and connected improvements;
- Legal Proceedings;
- Management of complaints including ASB;
- Health & Safety requirements for tenants and staff;
- Prevention and reduction of crime including fraud;
- Equal Opportunities monitoring; and
- Marketing, research, monitoring and survey (including Citizen's Together Panel).

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.

We want to make sure that our homes and communities that we support are safe places to live. We are committed to preventing and intervening early to tackle anti- social behaviour (ASB), supporting our residents affected by ASB, and promoting safe communities. From time to time we may operate CCTV/sound recording or use photography to capture evidence of breach of tenancy, alleged ASB or crime.

We wish to provide you with updates about events, services and other information that we believe are helpful to you in relation to the services that we provide. We may communicate such information to you by post, telephone or email (unless you have registered with the appropriate Preference Service or have indicated to us that you

do not require certain forms of communication). In the event that we perform monitoring, research and survey services we may use an external service company to contact you on our behalf. In such circumstances we ensure that legal obligations of confidentiality and information security are placed upon our service providers. If at any time you wish that your information is not used for direct marketing please contact Customer Service Centre 0300 790 6555.

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).

What information we collect, why we collect it, the legal basis for doing so, and how long for:			
What	Why and additional details	Basis	Retention
Contact information: <ul style="list-style-type: none">• Name• Date of Birth• Previous Address• Forwarding Address• IP (Internal Protocol) Address• Telephone numbers• Email address	<p>This data is used to set up and maintain your tenancy account with us.</p> <p>Your tenancy agreement is a contract between you, any other person in your household (should you hold a joint tenancy and or multiple occupancy) and Citizen.</p> <p>Your personal details such as name, address, tenancy start and end date and any forwarding addresses would be shared with the utility service companies including Energy Angels and local authorities where there is a legal justification to do so. This will be applicable pre-tenancy and during the course of our entire relationship and post</p>	B	Life of tenancy + 6 years after tenancy ends.

	tenancy in the event that monies are owed to the utility companies and local authorities.		
Special Category Data: <ul style="list-style-type: none"> • Ethnicity • Nationality • Sexual orientation • Religion • Physical and mental health wellbeing 	Fairness in the provision of social housing services, including health & safety purposes and for analysis purposes as required by our regulator and the UK Government. For receipt and disclosure of information on a confidential basis with health care providers	A	Life of tenancy + 6 years after tenancy ends and ins some cases indefinitely
Financial and Identity related data: <ul style="list-style-type: none"> • National Insurance Number (NINO) • Financial information including employment history and employment status • Banking details • Identification including photographic proof of identity (e.g., birth certificate and driving licence) • Residency 	To assess your benefit entitlement and council tax, to assure Citizen that you can sustain a tenancy and that you have the right to rent under Immigration Act 2014 and regulatory compliance, 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. Banking details are held to facilitate discretionary compensation payments. Once payment has been made the information is securely destroyed in accordance with financial best practice after 7 years.	B and A for Banking details	NINO and identification – life of tenancy/Financial information + 7 years. Banking details destroyed securely +7 years after payment.
Criminal offence data: <ul style="list-style-type: none"> • Details of unspent convictions • Criminal offences attracting a custodial sentence/on a register/person of interest • Alleged criminal offences 	We use unspent conviction information to house you appropriately and to make prosecutions in the event of subletting or other forms of criminal activity. Anti-Social Behaviour related information may be held and in particular to any alleged offences that are brought to our attention.	B	Life of tenancy but regularly reviewed. If no issues when conviction spent data will be deleted after 1 year following suspension.
Support and support arrangements: <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 	As required by our regulator and to provide information on extra services we provide – such as tenancy support. For receipt and disclosure of information on a confidential basis with health care providers.	B	Life of tenancy but regularly reviewed.

<ul style="list-style-type: none"> Disability/vulnerability information 			
Delegated responsibility: <ul style="list-style-type: none"> Power of Attorney Authority to Act 	We use this information to facilitate our dealing with the most appropriate person for your affairs.	B	Life of tenancy but regularly reviewed.
References <ul style="list-style-type: none"> References from previous landlords 	We use this information to provide appropriate support and to inform our decision making.	B	Deleted after 1 year of tenancy being granted.
Images, recordings and Identification: <ul style="list-style-type: none"> Audio images Visual images such as photographs or video recordings 	We use audio recordings in relation to the provision of customer service and to determine where further staff training may be required. Information may also be transcribed to the Customer Relationship Management (CRM) system to ensure we have a complete record.	F for Audio and A for visual images.	Audio recordings of calls are deleted after 1 month. Visual images may be retained on a permanent basis.
Call line identification	Your phone 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 the call, and recording of conversation as detailed above.	F	1 month from date of telephone call.
Car registration number	Protection of property, abandonment of vehicles, anti-social behaviour related incidents, and for Citizen to maintain grounds for tenants.	F	Period of 6 years
Marketing, survey, monitoring and research	All activities associated with improving service delivery, and the customer experience	F	Life of tenancy
Former tenant arrears (bad debtors list)	Obligation as a social registered housing landlord to maximise the collection of income and minimise any outstanding debts.	B	6 years and current financial year – Limitations Act 1980
Tenancy sustainment service	Provision of consent or Citizen's legitimate interests as appropriate to act on your behalf in relation to any tenancy or tenancy sustainment matter. In doing so, you authorise the Citizen Tenancy Sustainment Officer, to gather all relevant information and to disclose to relevant third parties.	A or F	Life of tenancy + 6 years after tenancy ends.
SHDF Wave 2.1 (Social Housing De-carbonisation Fund Wave 2.1) grant process and connected improvements	"Local Authority" : means the Matrix Partnership Consortium Members of the Matrix Partnership consortium are;	A	The data the Local Authority and/or

<p>Name.</p> <ul style="list-style-type: none"> – Location (town/neighborhood, street name but not house name/number). – Your contact details (telephone and email address, sometimes Skype details) – Your home background (for example, characteristics of the home before the upgrade, like, there was no central heating or leaking radiators). – Your experience with the scheme (for example, which measures were installed, how long it took to carry out the work, effects on your life and your bills). – Your phone number, email address and home address will never be included on any materials published for use inside or outside DESNZ – Your video which may or may not be edited to the discretion of the Local Authority. Any such editing will be done by using the editing method and software of the Local Authority's preference and it will be edited to the extent as required for the purposes it is intended for. 	<p>GreenSquareAccord Rooftop Housing Association Trident Housing Association Trent & Dove Housing The Pioneer Housing and Community Group Black County Housing Group Citizen Housing Group Ltd</p> <p>“BEIS” means the Department of Business, Energy and Industrial Strategy.</p> <p>“DESNZ” means the Department for Energy Security and Net Zero.</p> <p>Housing Association : means HA that applied directly not through an LA (wave 2.1 only)</p> <p>“Local Authority Delivery Partners” : means the organizations who deliver the works/installations at all premises where the energy efficiency scheme has been or will be delivered.</p> <p>“SHDF Wave 2.1” means the Social Housing De-carbonisation Fund Wave 2.1 grant, and works including reporting and management of the funding.</p> <p>We may share your words, image, video, name, approximate geographic location, and general information on the upgrade work and benefits with national and local press in the UK and abroad, social platforms, other local authorities, Local Authority Delivery Partners/ Housing Association, other central government departments (for example, Cabinet Office), general public, our stakeholders (for example TrustMark) and DESNZ staff.</p>		<p>Local Authority Delivery Partners/ or Housing Association and/or DESNZ teams collect during interviews will be destroyed by the end of the Scheme. This is currently planned to finish at the end of 2025 but may be extended.</p>
<p>SHDF Publicity information including contact details (telephone, email address)</p>	<p>We may share your details with journalists and with other government departments; we will not share your details with anyone else. They may then contact you to arrange further</p>	<p>A</p>	<p>The data the Local Authority and/or Local Authority Delivery Partners/ or</p>

	interview for print/online or audio/video recordings or still photography.		Housing Association and/or DESNZ teams collect during interviews will be destroyed by the end of the Scheme. This is currently planned to finish at the end of 2025 but may be extended.		
Types of legal basis					
A = Consent	B = Contract	C = Legal obligation	D = Vital interests	E = Public task	F = Legitimate interests

Where someone is sharing 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.

<p>How we process criminal offence data</p> <p>We shall only use information about criminal offence data where the law allows us to do so. This will be where such processing is necessary for us to discharge our obligations, and to act in the public interest in line with our Data Protection & Information Security Policy.</p> <p>Other instances whereby we need to process criminal offence data is in connection with legal claims, or where it is necessary to protect the physical mental or emotional wellbeing of you, or other individuals, and you are not in the circumstances capable of providing consent, or where the information has been made public. Some examples of processing include:</p> <ul style="list-style-type: none"> • To report incidents to third parties such as law enforcement or other agencies; and • To assess whether its appropriate, for us to provide you, or continue to provide you with accommodation including re-housing where necessary. <p>The processing of criminal offence data will also take place in the course of legitimate business activities with all appropriate technical and organisational controls.</p>

We are by law entitled to use your personal information in the manner described above and also in the public interest to discharge our duty of care to protect vulnerable children, young persons and adults. We have in place an appropriate policy and controls, which we are required by law to maintain whilst processing such data.

How we process Citizen's Together Panel data

Citizen's Together Panel Privacy Notice

The information you provide (personal contact details including name, address, email address, and phone numbers) to join the Citizens Together Panel will be used to invite you to customer engagement activities including but not limited to marketing calls, texts, emails, traditional mail, surveys, webinars and focus groups.

The objective of our processing is to promote the aims and ideals of Citizen by providing opportunities for customers to engage in service improvement. The information will be held and processed in accordance with the UK General Data Protection Regulation (GDPR) and Privacy Electronic Communications Regulations 2003 (PECR).

Under GDPR, the lawful basis that we rely upon for processing is in respect of our legitimate interests.

We also receive personal information indirectly or directly, from our housing management system to target and tailor our engagement activities to the needs of our customers. The source of such information is mainly from you as detailed in our Housing customer's privacy notice for the discharge of obligations in respect of a tenancy contract.

We will not identify you individually in any report without your prior consent nor share your information with any other third party except for our preferred contracted survey partner Typeform who are legally obliged to process your personal data in a secure and confidential manner.

Under UK GDPR and PECR you are entitled to withdraw your consent for processing at any time. You can do this by contacting: 0300 790 6555 or engagement@citizenhousing.org.uk

Alternatively use any of the other contact methods described at:

<https://www.citizenhousing.org.uk/contact-us/>

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 may be required to share information with statutory or regulatory authorities and organisations to comply with statutory obligations. Such organisations include health and social care partnerships, homelessness services, fire brigades, police authorities, health services and care and support organisations, local and regional authorities, government departments and agencies, auditors, consultants, utility companies, and external service providers.

All such data sharing is based upon the contents of this Privacy Notice, Citizen's contract with you and in accordance with the UK Data Protection legislation. We also share information relating to the protection of vital interests such as safeguarding, domestic violence, criminal activity and emergency services. We are also obliged to share your information with our regulators and public authorities who are permitted by law to have access to this information. In instances where you have made a complaint we are obligated to hand over your files to the regulator- or other public body to whom you made a complaint. We may also share your information with Central Government who have a legal right to acquire the information for research, analysis and statistical purposes. The information allows the Government to have a fuller picture of the social housing market and assists in developing social housing policy. For more information please see [Continuous Recording of Social Housing lettings and sales \(CORE\) notice](https://www.citizenhousing.org.uk/privacy). The information provided for CORE is anonymised and shared with the Department for Levelling Up, Housing and Communities, Homes England, Greater London Authority, National Housing Federation, local authorities and private registered providers, consultants and researchers. For a full list please see the Citizen Housing Customers Privacy Notice <https://www.citizenhousing.org.uk/privacy>

How do we keep your data safe?

Citizen takes the security of your personal data very seriously. We have internal policies, procedures and controls in place to safeguard personal data from loss, accidental destruction, misuse or disclosure, and that it is not accessed by unauthorised individuals. Where Citizen enters into arrangements with third party external service providers these are covered by contractual obligations that require confidentiality and appropriate information security controls to protect your personal data using a variety of methods to ensure secure transfer and storage.

How do we obtain your data?

We obtain personal data by various means, this can be face to face, by email, by telephone, correspondence or receiving information from others, for example MPs or local elected representatives, who are representing you, the police, health or social care agencies and benefits agencies. For a full list please see the Citizen Housing Customers Privacy Notice <https://www.citizenhousing.org.uk/privacy>

Your rights

Under the UK General Data Protection Regulation (GDPR), you have the right to be informed about how we use any data you provide: the right of access, the right to rectification, right to erasure, right to restrict processing, right to data portability, right to object, rights in relation to any automated decision making and profiling. As part of our obligations to inform you about the data we process this Privacy Notice informs you of what data we collect, who has access to it, how long its kept and the legal basis for doing so. In certain circumstances we may need to request your consent to collect and use your data, 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 may not 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, may be challenged and a human decision made. Additionally, you have a right of access and can request a copy of your personal data and subsequently if required exercise 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 Citizen's Data Protection Officer (Mr Shane Murphy), who is independent and an expert in data protection and acts as the contact point for data subjects at the contact address below. The Data Protection Officer reports to Citizen's delegated Senior Information Risk Owner (Mr Ian Tinsley), who is responsible for the overall management of your personal data. Contact address: Citizen Housing Group Ltd., 4040 Lakeside, Solihull Parkway, Birmingham Business Park, B37 7YN or dataprotection@citizenhousing.org.uk
Complaints can be lodged with the regulator: The Information Commissioner's Office: <https://ico.org.uk/concerns>