

Privacy Notice

Our Commitment to Your Privacy

As part of our commitment to protecting your information, we have created our Privacy Notice to explain how we collect, store and handle your personal data.

We have always been careful to protect your information, but this is part of our ongoing commitment to be transparent about how we use your information and keep it safe. This will also give you more clarity over how your information is being managed.

Through our privacy notice, we have addressed the standards introduced by the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA).

1 Who we are

Lafford Homes Limited is registered with the Information Commissioner's Office (ICO) as a 'data controller' under ZA531015. This means we decide what personal data we collect, what is going to happen with it, where it is stored and how long for.

2 What information do we collect

The information we collect from you includes your:

- Name
- Postal address
- Email address
- Telephone number
- Copies of any relevant identification documents
- Basic details of all household residents
- Employment details
- Banking details
- Rent and other payments
- Housing benefit information
- Credit checks
- Proof of housing eligibility
- We may ask you for information about any physical or mental health conditions or support needs to ensure we have an understanding of your housing needs and to give you appropriate information and advice on suitable housing options

- We may ask you about any criminal convictions you have to meet legal and public protection obligations we have when processing your application
- References received about you (for example, from your employer or previous landlord). We can, at your request, provide references to a new landlord on your behalf.

We may monitor, record and retain your communications to maintain an accurate record. This may be necessary to manage your tenancy or the property, or to deal with your application for a tenancy, and to manage our ongoing dealings with you.

We may also collect and receive data about you from third parties, which can include information from a guarantor or from a joint tenant or other residents. Public bodies, such as, other local authorities or the Police may give us information about you. This can also include the Department for Work and Pensions or the local authority where you are receiving Universal Credit or housing benefit. Utility companies or service providers may also give us personal information about you.

We obtain information about you if we carry out credit checks or take up references. We may also receive information from you via websites or from online rental portals.

3 Why we collect your data

We collect your personal data to plan and deliver services, including managing your tenancy; managing your property; ensuring we meet other legal obligations, for example, health and safety; and to check performance and improve our services for customers.

We collect information from you via a variety of sources, including when you apply for one of our properties or services, complete one of our forms, when you call, write, e-mail or meet with us or respond to a survey. However, if you do not wish to provide this information, we may not be able to proceed with your tenancy.

As far as is reasonable and practicable, we will ensure that the information recorded is accurate and kept up to date.

4 How we collect your data

We are processing your data under the following lawful bases:

- GDPR Article 6(1)(a) Consent – you gave us your consent (for example, to obtain a reference). However, we do not generally rely on your consent to process your personal data. However, if you have any queries regarding this lawful basis, please contact dataprotection@n-kesteven.gov.uk

- GDPR Article 6(1)(b) Contract – the processing is necessary for a contract between yourself and Lafford Homes, and enables us to carry out our responsibilities under the tenancy agreement with you and to be able to manage your tenancy.

When we collect special category data, we also rely on the following lawful basis:

- GDPR Article 9(2)(g) – the processing is necessary for reasons of substantial public interest, on the basis of Union or UK law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and interests of the data subject (for example, information relating to health conditions. This means we are better able to plan and deliver services to our customers. Details relating to health conditions ensure we provide accommodation or services that are suitable for your needs and that we provide you with adequate support should you wish to receive it).

In addition, we conduct research and consultation to help improve our services offered to you, gauge customer satisfaction and to evaluate our performance. Where possible, statistical information is anonymised or pseudonymised. We treat it with the utmost care and take appropriate steps to protect it.

5 When we'll share your data

We will share limited personal data with our contractors who are carrying out services on our behalf. Our contractors are required to comply with data protection law to ensure data is managed appropriately and for specified purposes, including to complete emergency, responsive or planned property repairs.

Legally, we must also hold and process information relating to any tenancy deposit which you pay to us, including sharing your information with a deposit scheme by which any deposit is protected.

We may share your personal data with a language translation service if it is necessary to translate information for you.

We may need to share your information with government departments and utility companies or with other organisations and agencies where we are legally obliged to do so. For example, we may share information with other local authorities to assist in the safeguarding of individuals or to prevent an eviction and we may discuss your financial situation, rent payments (including any arrears) and any claims made for welfare benefits with the Department for Work and Pensions and external debt advice agencies. However, Lafford Homes will only share information within the bounds of current data protection legislation and will ensure there is a lawful basis to do so.

In addition, we have a legal duty to provide personal information to other organisations or if there is a good reason that is more important than protecting

your privacy. This does not happen often, but we may share your information with the Police in order to find and stop crime and fraud, for example, and share information with Courts or legal professions in some circumstances.

We do not sell your personal information to anyone and will never share your information for marketing purposes.

Rarely do we transfer personal information to other countries outside the EEA, but for those circumstances in which we do, suitable security arrangements would be in place.

6 Know your rights

You have many rights regarding your personal data, which include accessing the personal information we hold about you. In addition, you can ask us to correct inaccuracies and potentially restrict what we use your personal data for.

Furthermore, you have the right to data portability, which allows individuals to reuse their personal data for their own purposes across different services allowing them to move, copy or transfer personal data more easily.

Where possible we will seek to comply with your request, but we may be required to continue to hold and process some information to comply with a legal requirement, for example. In addition, we may not always be able to change or remove information, but we will correct factual inaccuracies and may include your comments in the record to show that you disagree with it.

On occasions we need your consent to use your personal information, for example, subscribing to newsletters. Where you have given us consent, you have the right to withdraw it at any time. However, we do not always need consent to use personal information if we need it to meet regulatory requirements or to perform a contract with you.

If you want to get in touch with us with regards to your rights and/or you wish to remove your consent, please contact dataprotection@n-kesteven.gov.uk

7 How we protect your information

We comply with all laws concerning the protection of personal information and have appropriate security measures in place to reduce the risk of theft, loss, destruction, misuse or inappropriate disclosure of personal information.

Examples of our security include: encryption, meaning that information is hidden and cannot be read without certain knowledge, such as a password. In addition, we control access to systems and networks, which allows us to stop people who are not allowed to view your personal information from getting access to it.

8 How long do we keep your information?

We will keep your information for as long as the agreement is active, or where money is owed on the account, and for a period not exceeding three years afterwards. However, if your tenancy application does not go ahead then we retain data for one year.

9 Where can I get advice and/or make a complaint?

If you have any concerns or questions, or would like to make a complaint, regarding data protection matters, please contact our Data Protection Officer at dataprotection@n-kesteven.gov.uk or by calling 01529 414155.

For independent advice and/or to make a complaint about data protection, privacy and data sharing issues, you can contact the Information Commissioner's Office (ICO) at:

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

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.

Alternatively, visit ico.org.uk or email icocasework@ico.org.uk

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