

First Choice Homes Customer Privacy Notice

We ask that you read this Notice carefully as it contains important messages about the personal information we collect about you, what we do with your information and who your information might be shared with.

We ask that you keep your personal information accurate and up to date. If you cannot do this using one of our online services you can ask us to make changes to your personal information.

1. Why do we need to process your personal information?

We are a social housing provider with a vision of Improving Lives in Oldham. Our objectives are to provide to build new homes, provide excellent landlord and support services, and creating thriving communities. To meet our objectives we need to collect and utilise personal information.

We use your personal information to:

- allocate housing, provide housing management services, for community engagement, employment services and health and wellbeing services;
- make a tailored website and online services available to you;
- manage any registered account(s) that you hold with us such as My Account;
- verify your identity;
- address crime and fraud prevention, detection and related purposes;
- monitor, review and improve services and to carry our research;
- comply with our contractual and legal requirements;
- enable our colleagues to interact with you when things go wrong.

You contract with us for a service and the legal basis for the processing of your personal information by us is contract. We may also process your data because of a legal obligation, to protect your vital interests, where it is necessary to do so in our legitimate interests or where you consent.

2. What categories of personal information might we hold about you?

- personal details and social circumstances
- complaints
- education and employment details
- health, safety and security details
- visual images where we have CCTV
- lettings, leased properties
- housing waiting lists
- contracted housing obligations
- research
- housing and property grants
- welfare, wellbeing, employment, housing advice and support details
- finance management, accounts and records
- interactions with our employees, agents, and contractors
- internal and external communications including telephone calls
- enforcement activity

3. How do we manage your personal information?

Processing of your personal information will be undertaken in accordance with the principles of the General Data Protection Regulation and law in force in England. Our systems are protected to international security standards.

4. Who might we share your personal information with?

We will never sell or rent our customer's information to other organisations for marketing purposes.

We will share information with our suppliers and service providers so that we can provide you with excellent services and maintain our contractual obligations to you, for example obligations under a tenancy agreement to repair your home.

We receive personal information from sources such as the local authority when our customers apply for housing.

In order to make certain online services available to you, we may share your personal information with some of our service partners that includes IT providers.

However, we require our contractors to ensure they have appropriate data protection and security controls. We also impose contractual obligations on our contractors so that we can take action against them if things go wrong.

Aside from our contractors and service providers, we will not disclose your personal information to any third party, except as set out below or required by law.

We may share your information with:

- our partners who provide 'First Choice Homes' branded products and services (for example energy suppliers);
- credit reference agencies in particular where you are seeking to purchase a home from us;
- to exercise our legal rights (for example in court cases);
- for the prevention, detection, investigation of crime or prosecution of offenders; and for the protection of our employees and customers;
- with our contractors, in order to undertake repairs, maintenance or improvement works;
- with other housing associations, trusts and landlords, in connection with tenancy references and associated enquiries;
- with community partners in connection with the delivery of co-ordinated local services;
- with utility companies and Council Tax Offices if you have left one of properties and they ask for your data and debt collection agencies, in connection with some housing applications and in relation to any outstanding charges;
- with other statutory organisations, such as social services and health authorities, as necessary for exercising statutory functions;
- with our regulator, the Regulator of Social Housing, to comply with our regulatory obligations;
- to protect the vital interests of an individual (in a life or death situation).

5. Transfers

It may sometimes be necessary to transfer personal information overseas. When this is needed information is only shared within the European Economic Area (EEA). Any transfers made will be in full compliance with the law.

6. How long do we keep your information?

We will not retain your personal information for longer than necessary for the purposes set out in this Notice. Different retention periods apply for different types of information. We will not normally hold any personal information for longer than 6 years after you have ceased to be a customer.

7. What Information Rights do you have?

You may have one of the following Rights that are detailed in our Information Rights documents on our web site:

- The Right of Access
- The Right to Rectification
- The Right to Erasure
- The Right to Restrict Processing
- The Right to Data Portability
- The Right to Object to Processing
- Rights related to Automated Decision making and profiling
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8. Do we keep this notice under review?

We keep our Privacy Notice under regular review and we will place any updates on our website.

This Privacy Notice was last updated March 2019.

9. What are our contact details?

Contact details for feedback are as follows:

First Choice Homes Oldham, First Place, 22 Union Street, Oldham, OL1 1BE

Telephone: 0161 393 5599 Email: tellus@fcho.co.uk

For complaints:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF 0303 123 1113 / www.ico.org.uk

10. Can we explain the jargon?

Personal information is information about a living individual, which is capable of identifying that individual. This is sometimes called personal data.

Processing is anything done with/to personal information, including storing it.

The **data subject** is the person about whom personal information is processed.

The **data controller** is the person or organisation who determines the how and why of data processing.