

# Customer and Community Privacy Notice

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Here at Abri, we are committed to protecting your privacy and take the security of your information very seriously.

This Privacy Notice sets out how we will use and protect all information we collect about our Customers, and those living in communities where we have homes. This is in accordance with the General Data Protection Regulation 2016, the Data Protection Act 2018 ('Data Protection Legislation'), and any legislation that replaces it after 1 January 2021.

This notice applies to all current, former and potential customers who live in our homes as a tenant, shared owner, occupier or any other kind of lessee or sub-lessee, who have access to the housing services we provide. It also applies to neighbours, visitors, and to any next of kin that has been nominated by our customers.

We also have other specific privacy notices (listed below), which may also apply to you if you have another kind of relationship with Abri. You can find these on our website <https://www.abri.co.uk>:

1. Colleague Privacy Notice
2. Board Member Privacy Notice
3. Job Applicant Privacy Notice
4. Contractor Privacy Notice
5. Home Buyer Privacy Notice
6. Customer's Authorised Contact Privacy Notice

We process your data in accordance with relevant Data Protection Legislation, this Privacy Notice and our General Data Protection Policy.

## **Who we are**

When we say 'we' or 'us' in this document we're generally referring to those companies which form part of the Abri Group of Companies, of which Abri Group Limited is the parent company, namely:

- The Swaythling Housing Society Limited
- Drum Housing Association Limited

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- Portal Housing Association Limited
- Yarlington Housing Group

These organisations are data controllers and in this Privacy Notice are collectively known as Abri.

### **What sorts of information do we collect and hold**

We collect and process a range of data about you. Depending on the relationship we have with you, this may include:

- Name,
- Date of birth
- Current, previous and forwarding addresses
- Telephone numbers and email addresses,
- Next of Kin details (for use in emergencies)
- Your authorised contact details (when you have provided us with an authorisation to discuss your tenancy with certain other trusted individuals)
- Employment details and state benefit entitlements
- National Insurance number
- Records of anti-social behaviour (for more information please contact us and ask for a copy of our Anti-Social Behaviour Policy)
- Records relating to your interactions with our staff (including telephone recordings)
- Information concerning your obligations to us as our tenant or lessee, including rent payments and arrears, or service charges, and compliance with your tenancy contract or lease agreement
- Information concerning your welfare and ability to live independently at home
- Particular needs or conditions that our staff should be aware of when visiting your home
- Other agencies involved with your household
- Details of safeguarding risks to children or vulnerable adults (for more information please contact us and ask for a copy of our Anti-Social Behaviour Policy)
- Financial details – bank or building society account details to enable Direct Debit payments
- Responses to surveys
- Photos
- Copies of ID documents

We also process special categories of information (sometimes called ‘sensitive information’) that enable us to provide services that will meet your needs, protect your interests, and also to comply with our legal obligations under Equalities Legislation. These special categories may include:

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- Physical or mental health and disability details, any special adaptation needs you may have as a result of these, and your role as a carer for others in the household.
- Criminal offences, alleged criminal offences, and unspent convictions
- Equalities data, including ethnic origin, religious belief, sexual orientation and transgender status

### **Closed Circuit Television (CCTV)**

The CCTV systems installed across our buildings and sites are for safety and crime prevention only. Clearly visible notices are provided where CCTV is used, except in the rare instances where covert CCTV is in place (directed away from public spaces) for legitimate legal reasons i.e. in cases of ongoing serious ASB, domestic violence or other criminal actions perpetrated against a particular household. The reception area and interview rooms of certain Abri corporate buildings have CCTV and optional voice recording facilities which will only be activated with your knowledge (usually by use of notices).

CCTV images can be shared with lawyers, police and other agencies working to prevent or investigate crime, improve public safety or resolve antisocial behaviour.

CCTV images may also be shared with insurance companies for the purpose of determining liability for damage or harm caused by an incident involving those shown in the footage.

CCTV images are also retained for up to eight weeks or, until enforcement action is complete, and images that are no longer required will be destroyed.

Abri has a CCTV policy which can be accessed via our website – <https://www.abri.co.uk>

### **How we collect information about you**

We collect information about you throughout our relationship. This includes:

- When you apply for a home
- When you sign a tenancy, shared ownership, lease or tenancy exchange agreement
- Through ongoing contact with you during a tenancy or lease
- When you access services by logging onto our website or customer portal
- Recording information from calls and on-line chats with us
- When you terminate a tenancy or the resale process
- If you make a complaint

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- When dealing with anti-social behaviour (ASB) issues, which you or one of your neighbours has raised
- When we provide welfare & benefits advice or support
- When you respond to our surveys
- If you get involved with residents' scrutiny discussions

In some cases, we may collect information about you from third parties, such as your next of kin or authorised contacts, local authorities, landlords, health services, the police or neighbours (in the case of complaints or concerns raised about you).

### **How do we use your information?**

We process personal information to enable us to manage our business of providing social and affordable housing, accommodation and services, which may include any of the following:

- Letting, renting, leasing and selling properties (including shared ownership, right to buy and right to acquire)
- Managing tenancies and leases
- To facilitate tenant mobility by enabling mutual exchange of rented properties
- Maintaining and repairing our rented or leased properties
- Collecting and receiving rent (including arrears), service charges and charges for additional services;
- Administering waiting lists
- Providing certain welfare and benefit related services, advice and support
- Maintaining our accounts and records
- Provision of customer service
- Ensuring that our properties are kept in good order
- Training and monitoring service provision
- Monitoring and resolution of anti-social behaviour and disputes
- Safeguarding of children and vulnerable adults who live in or nearby our properties
- Ensuring the protection of our staff, contractors and those other tenants or visitors to our properties who may be affected by criminal or anti-social behaviour
- Investigating complaints
- Providing education, employment and training advice (through our associated company, I2A)
- Providing independent and supported living services
- Fraud and money laundering prevention.
- Processing requests from third parties dealing with e.g. council tax, shelter, homelessness
- Better understanding your needs and those of our other tenants or people who will live in proximity to you

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- For ensuring that our staff are always properly informed and equipped to provide the services you are entitled to receive, in a way that addresses both your needs and theirs.
- Making organisational improvements
- Engaging with our customers to get feedback on our current services and any improved or expanded service offers which we may provide or procure from others for your benefit in future
- Providing details of promotions, opportunities and special offers which may be of interest to you (with your consent, where appropriate)
- Getting in touch with you via phone, email, post or the customer portal
- Complying with our legal obligations, including health and safety.
- Managing legal risk and obtaining legal advice/representation where necessary
- Responding appropriately to public health emergencies

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research, surveys or statistical purposes in which case we may use this information indefinitely without further notice to you.

### **Who we might share your information with?**

Where it is necessary to share information about you, we will always comply with all aspects of Data Protection Legislation. Set out below are examples of when this may occur.

Some of your information will be accessible by colleagues, with those parts of our organisation that are involved in supporting our services to you.

We sometimes need to share personal information we process with others, including next of kin (particularly in emergencies or when we urgently need to carry out gas safety inspections and are struggling to fix an appointment with you), anyone who has been designated by you as authorised to receive information in specific circumstances, or to help you manage your account with us.

Occasionally, we may need to share your information with other organisations. We will only do so when reasonably necessary, and when we have a lawful basis, either because you have consented, or the Data Protection Legislation enables us to do so for another reason. Occasionally we share your information because we are compelled to do so, for example, because a court has ordered it, or because we have to do so under law.

Where reasonably necessary and lawful, we may share certain information with:

- Contractors (who carry out repairs, safety work, maintenance and installations)
- Local authorities (including homelessness units, social services and council tax depts)

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- Agencies involved in benefits and tax credits (including the DWP and Pensions service)
- Organisations which provide educational and career-based training (**always with your consent**)
- Charities and voluntary agencies (**always with your consent**)
- Health services (including GP) (**always with your consent, unless in case of a life-threatening emergency**)
- Police and law enforcement agencies
- Probation services
- Emergency services
- Schools and examining bodies
- Anyone you have appointed as your authorised contact for management of your tenancy, or who is formally registered (by the Office of the Public Guardian) as your lawful attorney under a Lasting Power of Attorney.
- Home service and care providers
- Other landlords (**always with your consent, where a reference is being provided**)
- Utilities companies
- Insurance companies
- Courts and tribunals
- Housing regulators
- Central government
- Auditors
- Debt collection agencies
- Credit reference agencies
- Survey and research organisations
- Press and the media (**always with your consent**)
- Financial service providers and advisors
- Mortgage administrators
- Solicitors

### **Lawful Grounds**

We collect, use and occasionally share your information for reasons which are recognised as lawful. These include:

1. the performance of: our landlord's obligations under your tenancy, lease or shared ownership contract with us; or other service contract we may have with you.
2. compliance with obligations imposed by law on us as landlords;
3. protecting the vital interests of our customers, staff or contractors when their life, health or well-being are seriously at risk;

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4. the performance of a task carried out in the public interest eg. safeguarding of children and vulnerable adults;
5. our legitimate interest in:
  - preparing to enter into a contract with you (tenancy, shared ownership or lease) including all necessary due diligence and disclosure
  - taking due care of our housing stock,
  - ensuring that payment due for utility bills or council tax incurred while living in our housing is paid by our tenants, or former tenants
  - helping to make the communities where our tenants or lessees live safe and secure environments
  - protecting the viability of our business, so that we can continue providing affordable housing to people who need it
  - contributing to the government and local authority's efforts to reduce homelessness within our communities
  - taking legal advice or bringing legal proceedings
  - ensuring that our staff are always properly informed and equipped to provide the services you are entitled to, in a way that addresses both your needs and theirs; and,
6. when you have provided us with your consent, eg. to allow us to send you information about services and opportunities that might interest you as our tenants. For more information on consent see page 7 of this Notice.

When we have collected sensitive information, we need additional special reasons for doing so and these might include:

7. your express consent
8. it is necessary for social protection
9. it is necessary for bringing or defending a legal claim
10. it is in the substantial public interest, for example in respect of measuring and monitoring performance against equalities standards.

### **How long we keep your information**

We will always keep your information in accordance with the law and regulation, and we'll never keep your information for longer than is reasonably necessary.

Your basic tenancy or lease information (i.e. your name, date of birth and address while a tenant of any landlord within the Abri Group) will be stored permanently against any tenancies you have had with us but once your tenancy has ended, we aim to delete all other information six years after your tenancy has ended.

Recordings of standard telephone conversations are held for a period of time which will not exceed six months unless they are deemed abusive or threatening, or if they contain content which is relevant to an ongoing investigation, in which case they will be kept until all relevant investigation actions are complete.

### **Information security**

We take the security of your data seriously, and we have internal policies, controls (electronic, physical and managerial) and procedures in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed unlawfully to others, and is only accessed by our colleagues in the proper performance of their duties. These security measures include:

- Limiting access to our building to those we believe are entitled to be there (by the use of key card passes and ID Badges)
- Implementing access controls to our technology and devices, such as firewalls, ID verification, and encryption.
- Implementing strict procedures which limit access to your data only to those staff or contractors who need to see it in order to carry out their jobs and/or deliver services to you.
- Never asking you directly for your passwords.
- Maintaining Cyber Essentials Certification.

If you are registered with our customer portal, you are the owner of your username and password, you mustn't share this information with anybody else.

### **International Transfers**

It may sometimes be necessary to transfer personal information outside the UK as a result of our requirements for data hosting services. If we do this your personal information, will continue to be subject to appropriate safeguards as set out in Data Protection Legislation.

### **Links to other websites and use of digital platforms**

We will sometimes provide you with links to other websites, but these websites are not under our control. We will not be liable to you for any issues arising in connection with their use of your information, the website content or the services offered to you by these websites. Therefore, we would advise you to consult the privacy policy and terms and conditions on each website to see how they may process your information.

In addition, when using other digital platforms such as Facebook and social networks, please remember it is your responsibility to set appropriate settings on your accounts so you are comfortable with how your information is used and shared on them.

### **Your rights**

#### ***Access to your personal information***

You have the right to a copy of the personal information that we hold about you. This is often called a Subject Access Request (SAR), and there are limits to this right, such as where the disclosure of the information would unreasonably impact the data protection rights of a third party.

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Before providing personal information to you or another person on your behalf, we may ask for proof of identity and information about your interactions with us so that we can locate your personal information. Your request can be submitted through our customer portals or it can be emailed to [dataprotection@abri.co.uk](mailto:dataprotection@abri.co.uk). To find out how else you can contact us, please visit our website.

### ***Correction of your personal information***

If any of the personal information we hold about you is inaccurate or out of date, you can request that it be corrected or updated. Or you can amend it yourself by logging in to the customer portal and editing your records.

### ***Right to object to our processing of your data***

If we rely on our legitimate interests as a basis for processing your personal data, you have the right to object to our continued use of that information, unless we can show that there is a compelling reason for the processing to continue or we are bringing or defending a legal claim.

### ***Right to erasure of your personal information***

You have the right to ask us to erase your personal information if:

- there is no longer a lawful reason for us to use it (including when you have withdrawn consent);
- our original purpose in processing that data no longer exists, and no other purpose has replaced it;
- you have objected to our processing of the information and there is no overriding legitimate interest for us to continue the processing; or
- the personal information has to be erased in order to comply with a legal obligation

We can refuse to erase your personal information in certain circumstances, including, when:

- we have an overriding legitimate interest in continuing to process it;
- we have to comply with a legal obligation that requires us to continue processing that information
- we need to do so as part of a task we are carrying out in the public interest; or
- we need the information as part of a legal claim that we are bringing or defending
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### ***Right to data portability***

You have the right to receive and reuse your personal information which you have provided to us, for your own purposes across different services. This applies where

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the processing is based on your consent or for the performance of a contract and when processing is carried out by automated means.

### **Consent**

In some circumstances, your consent is the legal basis for us using your information. Consent must be freely given by you for a specific purpose; we will always clearly explain why we need the information we have asked you for. Consent must be clearly given; so, we never assume your consent, or use pre-ticked boxes to communicate consent.

You have the right to change your mind at any time and withdraw your consent. The consequence might be that we can't do certain things for you. Consent can be withdrawn using our customer portal , by emailing [dataprotection@abri.co.uk](mailto:dataprotection@abri.co.uk) or by writing to us at the address given below.

### **Contact us**

If you'd like to exercise any of these rights or have a question about this policy or the way your personal information is used, please contact our Data Protection Officer by one of the following means:

**By emailing:** [dataprotection@abri.co.uk](mailto:dataprotection@abri.co.uk)

**Online:** through logging on to the customer portal

**By Phone:** via our **Customer Experience Service Centre:**

- for customers in Somerset, Dorset and Devon: 01935 404 500

- for customers in all other locations: 0300 123 1567

**By Post:** Data Protection Officer, Abri Group Ltd., Lupin Way, Yeovil, Somerset BA21 8WN.

#### ***Lodge a Complaint via our Complaints team***

You can lodge a complaint about the handling of your personal data at any time by calling our Customer Service Centre on the phone numbers given above; or by emailing [dataprotection@abri.co.uk](mailto:dataprotection@abri.co.uk).

#### ***Lodge a Complaint with the Supervisory Authority***

You have the right to lodge a complaint to the Information Commissioner's Office (UK's Supervisory Authority) go to [www.ico.org.uk](http://www.ico.org.uk) or ring 0303 123 1113 to find out more.