**Data Collection Form**

Housing Solutions (“we”) are defined as a data controller and responsible for your personal data under the General Data Protection Regulation (GDPR) and any successor legislation to the GDPR (collectively the “Data Protection Legislation”). We are registered with the Information Commissioner’s Office (ICO) under Z6037328.

We can be contacted in writing at Crown House, Crown Square, Waldeck Road, Maidenhead, Berkshire, SL6 8BY, by email at datacontroller@housingsolutions.co.uk or by telephone at 0800 876 6060 or 01628 543101. Our data protection representative is the Head of Business Information and Data Integrity and can be contacted using the contact details above.

It is important that you read the information contained within this Data Collection Form together with our Privacy Policy and any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you. This is so that you are fully aware of how and why we are using your data. This Data Collection Form supplements our Privacy Policy and the other notices and is not intended to override them.

1. **What personal data do we process?**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you (the primary tenant), joint tenant(s) and any other occupants of the property which we have set out below in section 2.

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, your tenancy agreement).

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

1. **Purposes for which we will use your personal data**

We have set out overleaf, in a table format, a description of the likely ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

|  |  |  |
| --- | --- | --- |
| **Purpose/Activity** | **Type of Data** | **Lawful basis for processing** |
| To keep our records up to date and to help prevent tenancy fraud and illegal subletting | * Communications
* Contact
* Financial
* Identity
* Profile
* Technical
* Transaction
* Usage
 | * Contract
* Legitimate interests
 |
| To communicate with you and keep you informed about services that may be useful to you | * Communications
* Contact
* Financial
* Profile
* Technical
* Transaction
* Usage
 | * Legitimate interests
 |
| Verifying your identify | * Identity
 | * Contract
* Legitimate interests
 |
| Managing your tenancy, including to help you improve your financial circumstances | * Communications
* Contact
* Financial
* Profile
* Transaction
 | * Contract
* Legitimate interests
 |
| To provide information to third parties that we work with (e.g. the Police and other emergency services, training or employment opportunities, external service providers). | * Communications
* Contact
* Financial
* Identity
* Profile
* Technical
* Transaction
* Usage
 | * Contract
* Legitimate interests
* Vital interests
 |
| Recording communication with us (including telephone calls) for training and monitoring to ensure a high level of service is provided. | * Communications
* Transaction
 | * Legitimate interests
* Vital interests
 |
| **Purpose/Activity** | **Type of Data** | **Lawful Basis** |
| Recordings for safeguarding purposes, in addition to preventing and detecting crime (e.g. CCTV). | * Audio
* Image
 | * Legitimate interest
* Vital interests
 |
| Information provided by third parties relevant to your circumstances (e.g. social workers or healthcare professionals). | * Communications
* Contact
* Financial
* Identity
* Health
* Profile
* Technical
* Transaction
* Usage
 | * Contract
* Legal obligations
* Legitimate interests
 |

1. **Special Categories of Personal Data**

We may also process the following special categories of sensitive personal data:

|  |  |  |
| --- | --- | --- |
| **Special categories of personal data** | **The purpose for which we process these special categories of personal data**  | **Lawful basis for processing** |
| Religion or other beliefs of a similar natureRacial or ethnic originSexuality and/or sexual lifeTrade union membershipHealth, e.g. details of any physical or mental health conditions, or disabilityOffences committed or alleged to have been committed, outcomes and sentences, commission of proceedings for any offence | 1. To assist us in managing your tenancy and providing you with advice and support, as required.
2. To help us assess what adaptations we may be able to make to provide you with easier access to your property.
3. For statistical purposes.
4. To provide a service which meets your individual requirements and to develop future services to meet the needs identified.
 | * Performance of a contract with you.
* Necessary for our legitimate interests (to understand the different types of tenants we work for, to keep our services updated and relevant, to develop our business and to inform our business strategy).
* Necessary for the purposes of preventive or occupational medicine, for the assessment of your working capacity, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of English law.
 |

1. **How we treat your personal data**

We are committed to treating your personal data fairly, lawfully and transparently.

When processing your personal information we will comply with all relevant Data Protection Legislation and any national implementing laws, regulations and secondary legislation. The information we collect to deliver you a service throughout your tenancy is detailed in this document and our Privacy Policy found on our website at <https://www.housingsolutions.co.uk/cookies/privacy/> .

It may sometimes be necessary to transfer your personal data overseas. When this is required, information will only be held or processed within the European Economic Area (the “EEA”).

We will ensure all relevant and reasonable measures are in place to keep your personal and sensitive personal data secure.

1. **How we share your personal data**

We may have to share your personal data with third parties for the purposes set out in the tables at sections 3 and 4 above.

We collect and share relevant information, which may include the disclosure of your personal data to others, for various purposes including:

where required to by law, with law enforcement and government agencies, local authorities or public bodies where we are legally required to do so. Examples may include:

* The prevention or detection of crime and fraud;
* The apprehension or prosecution of offenders;
* The assessment or collection of tax or duty owed to customs and excise;
* In connection with legal proceedings;
* In relation to the physical or mental health of an individual, where disclosure is required to protect them or others from serious harm and to protect their vital interests;
* Research and statistical purposes.

when engaging third party contractors (data processors) to carry out functions on our behalf;

to provide, change and improve our services, example of which include:

* housing contractors e.g. to undertake repairs or improvements to your home;
* IT providers who own or manage the computers, phones or systems we use;
* our contractors who handle your out of hours service calls for us;
* financial institutions e.g. to carry out payments through a secure system;
* companies that assist us in mailing out our leaflets/ newsletters and/or to undertake research (including but not limited to customer satisfaction surveys);
* additional staff resources, such as consultants or agency staff;
* our professional advisors and providers of financial services;
* our partner organisations whose purposes dovetail with ours;
* training providers or learning institutions;
* other housing associations.

when engaging external assistance where you have agreed to the referral, for example to do with financial problems or domestic abuse

to local authorities and government departments who provide relevant services for you, including benefits

to the police, fire services, utility companies, health authorities or medical staff who provide services for you

to debt collection agencies acting for others; for example this may be necessary if you terminate your tenancy with an outstanding rent balance and no payment arrangement in place, we may forward your details to a debt collection company or tracing agent. This information will be your name, address, contact details, current arrears, last payment made and tenancy start and end date. We will also share any forwarding address if you leave the property in debt with a utility company.

We require all third parties to respect the security of your personal data and to treat it in accordance with Data Protection Legislation. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

1. **How long do we keep your personal data for?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Either by law or in line with best practice we have to keep some information about our tenants (including tenancy agreements), most of which is kept for a period of six years after they cease being tenants, unless otherwise stated in our Data Retention Policy. After this retention period expires the data will be securely destroyed.

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

1. **Your rights in relation to your personal data**

As a ‘data subject’ you have certain rights over the personal data we hold and process about you, specifically:

1. **The right to be informed**

Individuals have the right to be informed about the collection and use of their personal data

1. **The right of access**

Individuals have the right to access their personal data and supplementary information, including confirmation that their data is being processed.

1. **The right of rectification**

Individuals have the right to have personal data rectified if it is inaccurate or incomplete.

1. **The right to erasure (also known as the ‘right to be forgotten’)**

This is also known as the ‘right to be forgotten’. Individuals can request the deletion or removal of personal data where there is no compelling reason for processing it.

1. **The right to restrict processing**

The processing of personal data may be restricted in certain circumstances, e.g. where the accuracy of the personal data is contested.

1. **The right to data portability**

Individuals have the right to obtain and reuse their personal data for their own purposes across different services.

1. **The right to object**

Individuals have the right to object to the processing of their personal data in certain circumstances.

1. **Rights in relation to automated decision-making and profiling**

Individuals have extra protections where automated decision-making (i.e. making a decision solely by automated means without any human involvement) is the sole method of decision-making.

These rights are set out in more detail on the ICO’s website [www.ico.org.uk](http://www.ico.org.uk).

1. **Requesting a copy of your personal data**

If you wish to obtain a copy of the personal data we hold about you, please put your request in writing to the Head of Business Information and Data Integrity, Housing Solutions, Crown House, Crown Square, Waldeck Road, Maidenhead, Berkshire, SL6 8BY or datacontroller@housingsolutions.co.uk by email.

We are legally obliged to make this information available within one month of your request (which can be extended by a further two months if the request is complex or numerous requests have been received from one individual) once we have received the request in writing, together with proof of your identity, in accordance with our Subject Access Request Procedure. Please note that if your request(s) for a copy of your personal data is ‘excessive or manifestly unfounded’, we have the right to refuse your request or charge a reasonable fee to reflect the administrative cost of providing you with a copy of your personal data.

1. **Contacting us about your personal data**

Our Privacy Policy is available upon request and outlines our approach to data protection in full. If you require any further information on this matter or wish to exercise any of your data subject rights (as listed above) then please contact our Customer Contact Centre on 0800 876 6060 or email datacontroller@housingsolutions.co.uk. For independent advice please contact an appropriate agency such as the Citizens Advice Bureau on 03444 111 444 ([www.citizensadvice.org.uk](http://www.citizensadvice.org.uk)) or the ICO ([www.ico.org.uk](http://www.ico.org.uk)) on 0303 123 1113.

1. **Questions and complaints**

If you have a questions or concerns about any of your personal data that we hold or process, please contact us. If, after contacting us, you are still not satisfied, you have the right to make a complaint at any time to the ICO, the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk/)).

We need your permission to process the special categories of personal data about you set out in section 3 of this Data Collection Form. If you have submitted special categories of personal data about other individuals besides yourself in completing this Data Collection Form then we will also need their permission to process their personal data. We will only use the special categories of personal data in order to:

* Perform our contract with you;
* Satisfy our legitimate interests to understand the different types of tenants we work for, to keep our services updated and relevant, to develop our business and to inform our business strategy; and
* Provide preventive or occupational medicine, assess your working capacity, perform medical diagnosis, provide health or social care or treatment or assist with the management of health or social care systems and services on the basis of English law.

We will at all times process such special categories of personal data in accordance with our Privacy Policy which is available at <https://www.housingsolutions.co.uk/cookies/privacy/>. By signing in the space provided below, you and every individual over the age of 16 named in this Data Collection Form are providing your specific consent to us processing the special categories of personal data submitted in this Data Collection Form for the purposes set out above.

Address …………………………………………………………………………………..

Signed …………………………………………………………………………………..

Printed …………………………………..………………………………………………

Date …………………………………………………………………………………

 *Incoming customer*

Signed …………………………………………………………………………………..

Printed …………………………………..………………………………………………

Date …………………………………………………………………………………

 *Incoming customer (if joint tenancy)*

Signed …………………………………………………………………………………..

Printed …………………………………..………………………………………………

Date …………………………………………………………………………………

 *Other occupier of the property*

Signed …………………………………………………………………………………..

Printed …………………………………..………………………………………………

Date …………………………………………………………………………………..

*Witnessed on behalf of Housing Solutions*