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**STOKE ON TRENT HOUSING SOCIETY -**

**PRIVACY POLICY NOTICE**

**Introduction**

Stoke on Trent Housing Society is committed to protecting and respecting your privacy.

This privacy policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

By visiting <http://stokeontrenthousingsociety.org.uk> and/or making use of our products/services you are accepting and consenting to the practices described in this privacy policy.

**General Data Protection Regulation**

We comply with the principles set out in the General Data Protection Regulation. The personal information you provide to us will be processed fairly and lawfully. We will comply with the relevant English Data Protection laws, which include having a legal duty to protect any information we collect from you. We use appropriate technologies to safeguard data, and keep strict security standards to prevent any unauthorised access to it. Normally, any personal details provided to us will not be disclosed to third parties outside the company without the user's consent. However, in some circumstances, we may share information to other agencies or organisations such as contractors working on our behalf, the police or local authorities and any other organisation with whom we work where the law allows.

To ensure we are talking to the correct person when you call we will ask you to confirm some security details.

For the purpose of the General Data Protection Regulation (**GDPR**) and other UK data protection laws (**Data Protection Laws**) that apply from time to time, the data controller is Stoke on Trent Housing Society Limited, The Trevor Jones Office, Hammond House, Ridgway Road, Stoke on Trent, ST1 3AX. The Society is registered with the Homes and Communities Agency under Section 3 of the Housing Act 1996.

**How we collect information**

We collect information in a variety of ways including using this website; on various forms, tenancy agreements, and contracts; through our ongoing contact with you; in some cases we collect CCTV images

**Information we may collect from you**

We may collect and process the following data about you:

• **Information You Give Us.** You may give us information about you by filling in forms on our site, by corresponding with us by phone, e-mail or otherwise. The information you give us may include your name, gender, date of birth, address, e-mail address, postal address and phone number, and other personal data (including sensitive or special category personal data) that you provide to us.

When you apply to become a Stoke on Trent Housing Society customer, we request and hold on file information necessary to assess your application. This includes information from other housing providers / private landlords. In some circumstances we may collect information from the Police, the Probation Service, support workers, social workers and mental health workers.

Whilst you are our customer we may process other personal information to manage your tenancy. This will vary on a case by case basis but may include financial information (we may use this to help resolve arrears payments and optionally to provide welfare, benefits and debt advice as a free service to help you budget and pay your bills) and warning information (where the safety of our staff is believed to be at risk, usually where a customer has threatened staff, we may record this information on your record so that risks to our staff can be minimised).

If you provide us with personal information relating to members of your family or your associates we will assume that you do so with their knowledge and their consent to the collection and processing of the information.

• **Information We Collect About You.** We may also collect supplier information about our payments system provider, [www.allpayments.net](http://www.allpayments.net/) and IP addresses. We may use aggregate data and statistics for the purpose of monitoring the site usage in order to help us develop the site and our services. The statistics will not include information that can be used to identify any individual.

**Uses made of the information**

We use information held about you in the following ways and on the associated lawful grounds for processing as set out below. The lawful grounds that we utilise are:

1. Our processing is necessary for the performance of a contract to which you are subject or in order to take steps at your request prior to entering into that contract (**Performance of Contract**)

2. Our processing is necessary for the purposes of our legitimate interests or those of a third party, except where such interests are overridden by your interests or fundamental rights and freedoms (**Legitimate Interests**)

3. In the case of us processing sensitive or special category personal data, processing is necessary for reasons of Public Interest in the area of Public Health (**Public Health**)

**If you believe that our legitimate interests are overridden by your interests, rights or freedoms as the data subject you have the right to object.**

**Sensitive Personal Information**

Under GDPR certain categories of personal information are classified as sensitive or special category data. These categories are data relating to racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; health/medical data; sex life or sexual orientation.

We minimise the use of special categories of personal data but, given the services we provide there are times when we may have a legitimate interest in processing special categories of data and therefore, we may ask for your consent to collect and process this data.

We will always give you a ‘prefer not to answer’ option when we ask for any of the special categories of data above. However, please note that if you choose not to provide the information we may not be able to provide all our services to you.

Providing us with special category data helps us deliver our services when providing accommodation for disabled people (including adaptations), people with substance abuse problems or when helping someone to access care services.

Collecting special category data also helps us ensure that we meet the Public Sector Equality Duty. This requires Stoke on Trent Housing Society, as a social housing provider, to give due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations. This means that we may ask you for information about your ethnicity, religion or belief and so on but our responsibilities under the Public Sector Equality Duty do not over ride your right to privacy.

When we collect specific sensitive data we will notify you of how we will use it, and we will tell you who it may be shared with. We do not process genetic or biometric data for the purpose of uniquely identifying a natural person.

**CCTV**

Some of our properties have CCTV in public areas to deter crime and anti-social behaviour and to promote public safety by helping to identify and prosecute criminal offenders. You can ask for a copy of any CCTV images taken of yourself by making a 'subject access request'.

We carry out an impact assessment for all locations where we user CCTV. This helps ensure that our use of CCTV is appropriate and proportionate to issues of crime and public safety we are seeking to address and minimises intrusion into individual rights to privacy.

**Sharing Your Information**

Your personal information will be kept secure and confidential. Usually we will not disclose personal data without consent but we may share information with contractors or third parties and other agencies we work with, including Local Authorities, Social Services, Police, other social landlords and other agencies when we believe it is in your or the public’s interest to do so, or as required by law.

In particular, please be aware:

◦Current or forwarding addresses may be shared with utility companies and Council Tax offices to ensure billing details are correct.

◦If you default upon any tenancy/licence conditions information about you may be provided to authorised debt recovery agencies, to enable them to recover the debt. This may affect future applications for tenancies, credit and insurance.

◦We may discuss your financial situation, rent payments (including any arrears) and any claims made for welfare benefits with; an external debt advice agency, Welfare Rights Advisor, the housing benefit department or the local authorities housing advice and homeless prevention team to make sure that benefits are paid correctly.

◦All customer names, addresses and rent amounts are shared at the end of each year with local authority benefits teams and the Department of Works and Pensions to help claims for housing benefits and changes to housing benefits happen more quickly and easily for everyone. All customers are included as we do not always have records of who receives benefit, due to direct payment.

**Accessing Your Information**

Please contact us using your preferred contact method if you would like copies of some specific information from your files, and we will try to provide it as quickly as possible.

If you require a substantial amount of your personal information, there is a formal process for this, under the General Data Protection Regulation, known as a Subject Access Request (SAR).

You can write to us or email us with your request. We may require proof of your identity and address – we will let you know this when we receive your request. When we receive your valid request – with proof of id/address if required- we will respond and provide your information within 30 calendar days at the latest.

You can request to see any of the information that we may hold about you, including CCTV images, however the more specific you can be about what you require, the quicker we can respond to your request.

If you are requesting CCTV footage of yourself, please specify the time, date and location of the footage, and supply a clear photograph so that we can find you on the footage.

Please be aware that we may need to edit some information out, if it relates to other people, as we must protect the privacy rights of all individuals.

**Security of Information**

We are committed to ensuring that your information is secure and we operate secure data networks protected by industry standard security systems. In order to prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect on line.

Phishing is the name given to attempts to steal personal details and financial account details from a website user. “Phishers” use fake or “spoof” emails to lead users to counterfeit websites where the user is tricked into entering their personal details, such as credit card numbers, user names and passwords. We will never send emails asking you for such details.

**Viruses, Hacking and Other Offences**

You must not misuse our site by knowingly introducing viruses, Trojans, worms, logic bombs or other material which is malicious or technologically harmful. You must not attempt to gain unauthorised access to our site, the server on which our site is stored or any server, computer or database connected to our site. You must not attack our site via a denial-of-service attack or a distributed denial-of service attack.

By breaching this provision, you would commit a criminal offence under the Computer Misuse Act 1990. We will report any such breach to the relevant law enforcement authorities and we will co-operate with those authorities by disclosing your identity to them. In the event of such a breach, your right to use our site will cease immediately.

We will not be liable for any loss or damage caused by a distributed denial-of-service attack, viruses or other technologically harmful material that may infect your computer equipment, computer programs, data or other proprietary material due to your use of our site or to your downloading of any material posted on it, or on any website linked to it.

We make every effort to ensure that our systems and website are free from viruses, defects and harmful files. However, all of the material accessed through the use of our website is entirely at your own risk. Stoke on Trent Housing Society is not liable for any loss or damage to your software or computer systems or loss of data as a result of using, or the inability to use, this website.

**Links to Other Websites**

The notice is limited to this website only. If you follow a link to an external site, we recommend that you check the privacy notice of that site before giving any personal details.

Our website may contain links to other websites of interest however, once you have used these links to leave our site you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. Using these sites is entirely at your own risk and we are not responsible for any loss or damage your may suffer as a result of viewing or using these sites. You should exercise caution and look at the privacy statement applicable to the website in question.