

# Harbour Light Assisted Living CIC



## Data Protection and Privacy Policy

Harbour Light Assisted Living CIC is a Registered Social Landlord and is registered with the Information Commissioner's Office as a Data Controller under the General Data Protection Regulations 2018 with registration number ZA206750.

This privacy policy explains what personal information we hold about you and how we use any personal information we collect about you when you use any of our services or when you visit our website.

### **What information do we collect about you?**

We hold personal data such as your name, dates of birth, contact details and records of any transactions such as payments or requests for information, we may hold bank details, previous housing circumstances and where required sensitive personal data such as gender; ethnicity; religion or other beliefs, sexual orientation, and medical history.

- We collect information about you when: -
- We receive a referral from a Local Authority or referring partner;
- When we receive an application form for a tenancy at one of our properties;
- Select an offer of one of our properties;
- Request any of our services;
- Voluntarily complete a customer survey;
- Provide feedback or make a complaint;

We also process personal information using CCTV systems at some sites; we monitor and collect visual images for security reasons, the prevention and detection of crime; and staff safety and monitoring purposes.

From time to time we may also be provided with information about you from other agencies such as the housing benefit and social services department in the Local Authority, the Department of Work and Pensions the Police or the NHS.

### **How will we use the information about you?**

We use your personal information to:

- Enable us to provide you with accommodation and to communicate with you in order to provide services which meet your needs.
- Process any claims for housing benefit support where applicable
- Ensure that we meet all our legal and statutory duties such as those which apply under the Equality Act 2010.
- We record information to assist us in delivering housing management services including reports of antisocial behaviour; complaints; change in circumstances e.g. if you have a medical need which means you need to move or when your employment status changes
- Help with crime prevention and the prosecution of offenders
- To protect individuals from harm
- Provide you with welfare services including advice and appropriate support

### **Sharing your information**

Normally only employees of Harbour Light will need to view and process your information but we may sometimes need to share the personal information we process with other organisations

Where necessary or required, we may share your personal information as follows:

- With our contractors, in order to undertake repairs, maintenance or improvement works.
- With third party service providers, in connection with services performed on our behalf. For example, if we use a research company to carry out a resident satisfaction survey or if we use a mailing house to distribute our newsletters.
- Our relationships with such providers are governed by our contracts with them which include strict data sharing and confidentiality protocols.
- 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 their representatives) and Council Tax Offices, to ensure billing details are correct or in connection with unpaid bills.
- With credit reference agencies and debt collection agencies, in connection with some housing applications and in relation to any outstanding charges.
- With local authorities and government departments, as necessary for administering justice, or for exercising statutory, governmental, or other public functions.
- With police and other relevant authorities (e.g. Probation Service, Department of Work & Pensions, HM Revenues & Customs) in relation to the prevention or detection of crime and fraud; the apprehension or prosecution of offenders and the assessment or collection of tax or duty.
- With other statutory organisations, e.g. social services & health authorities, as necessary for exercising statutory functions.
- With our regulator, the Homes & Communities Agency (HCA), to comply with our regulatory obligations.
- Where it is necessary to fulfil a contract, or where we need to ensure that you are being paid the correct amount of benefit entitlement such as with the DWP or housing benefits department, or where we are legally required to do so.

This list is not exhaustive as there are other circumstances where we may also be required to share information, for example:

- To meet our legal obligations
- In connection with legal proceedings (or where we are instructed to do so by Court order)
- To protect the vital interests of an individual (in a life-or-death situation)

We will not share your information with third parties for marketing purposes. Transferring information overseas

We do not transfer any personal information outside of the EEA.

### **How long do we store information?**

Any information we collect is stored using the [guidance](#) issued by the National Housing Federation. Full details of this are included in our Data Retention Policy which is available on request.

## **Your rights to access data**

Any requests for information must be made in writing and also include proof of your identity. If we consider that your request is unfounded, asking for too much information or it is information we have previously provided then we may charge a reasonable fee for this or we may refuse to respond to you. If we refuse to respond to your request, we will advise you of our reason with one month of your request. You have the right to appeal to the Information Commissioner's Office or to seek a judicial remedy.

## **GDPR Consent**

You have the right to withdraw consent for the use of your information at any time; however this may affect the service that we are able to provide you with. i.e. we need to have access to information you provide in respect of any housing application in order to ensure our compliance with the allocations Policy and to ensure that we provide you with a property that is suitable for your needs.

If you believe that the information we hold on you is incorrect then you should notify us and we will arrange to have the information corrected within one month of you telling us. We will also tell anyone else who we have provided this information to.

You also have an additional right to have a copy of any information that you have provided to us in order to provide that information to another housing association or agency

Please contact us if you have any questions about our privacy policy or information we hold about you:

By email: [hello@harbourlight.org.uk](mailto:hello@harbourlight.org.uk)

By post: 71 Linacre Road, Bootle, Liverpool L21 8NP

By Telephone: 0151 909 5919

Data Protection Manager Name: Mark Adams - contact by email: [mark@harbourlight.org.uk](mailto:mark@harbourlight.org.uk)

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