

Holt Housing Society Website Privacy Statement

Purpose

The purpose of this privacy statement is to explain how the Holt Housing Society (HHS) processes all personal data which is gathered through the course of its business. The outcome provides a framework against which HHS fulfils its data protection responsibilities. This statement is supplemented by a privacy notice that is issued to tenants, potential tenants and any individual connected with the HHS whose personal data is collected.

The Role of the HHS

The HHS is a data controller in so much that it determines the purpose and use of personal data collected in order to fulfil its function especially with respect to tenants and future tenants. In all cases, once personal data has been received it becomes the responsibility of the HHS Privacy Manager to ensure that it is processed in accordance with the latest UK data protection legislation.

Duty of Confidentiality

The HHS Board of Trustees expects all HHS staff to understand and enforce a duty of confidentiality to you in the way your personal data is processed. This will only be disclosed among the staff that need to know it and all reasonable measures will be taken to ensure it is kept secure and not shared unlawfully.

The Board also expects the same duty of confidentiality of all third parties with whom the HHS shares personal data, including contractors. Any sharing is kept to a minimum and is subject to scrutiny.

Why we process your personal data and against which lawful basis

The legal bases for processing your personal data will vary and typically the HHS will use a combination of legitimate interest (typically for routine contacts and applications), legal and contractual obligation (typically for tenants). A privacy notice for tenants and prospective tenants, that sets out the lawful bases for personal data processing, is issued separately. In all cases the processing of personal data by the HHS shall be:

- Processed fairly, lawfully and transparently;
- Collected for specified, explicit and legitimate purposes;
- Adequate, relevant and limited to what is necessary (and no more);
- Accurate and, when necessary, updated;
- Kept for no longer than is necessary; and
- Processed in a manner that ensures appropriate security.

With whom we share your information

Depending on the nature of the requirement, the HHS will share personal data with some or

all of the following third parties:

- North Norfolk District Council Housing Department;
- Contractors, but only when selected to conduct house specific work;
- Local authority Social Services;
- Department for Works and Pensions;
- UK Government Fair Rents Officer;
- The Inland Revenue (HMRC);
- Local solicitors appointed by HHS; and
- Police (normally emergencies only).

Where we process your data

Personal data provided on application forms are processed and stored in the office of the HHS administrator in Holt. Back-ups of this information is only stored in the UK. Contact details of tenants and applicants may be stored on the secretary's business mobile phone.

No personal data is stored on the HHS website server.

How long we retain your personal data for

The HHS will retain your personal data when a lawful basis exists and for no longer than is necessary and in accordance with its retention schedule, see below:

- Any original documentation collected during the course of your application will be returned to you as soon as is practical;
- Routine correspondence with casual enquirers for which an application for housing has not been received or is not relevant, will be stored for only 6 months;
- Routine correspondence, other miscellaneous documentation and emails between you and the HHS, generated during the period of the application process and the resulting tenancy contract, will be stored for 3 years after the point at which the contract was ended;
- Records of your payments will be retained throughout the period of our tenancy contract and up to 7 years after the contract has ended; and
- Exceptionally, documentation that includes personal data, may be retained by the HHS beyond the timelines shown above, but only for a specific purpose and when the HHS believes it has a legitimate interest and/or a legal obligation to do so.

What we do with your personal data at the end of our retention period

At the end of the retention schedule, the HHS will either return, destroy or delete the relevant documentation, including application forms, personal correspondence and emails. When it is technically impractical to delete all electronic copies of your personal data, we will put it beyond operational use. We will then record the action and notify you.

The only exception to the above is where the HHS has a legitimate interest to maintain a register of tenants for statistical purposes. The only personal data being retained will be the

name of the main applicant against a record of the address of the house and the time period over which the house was occupied.

Updating personal data records

If it comes to light that the personal data held by the HHS is either inaccurate or needs to be updated due to someone's change of circumstances, once informed the HHS will update its records within one calendar month.

What happens if you contact the HHS using this website portal

On the website Contact Page an email address for the HHS has been provided. Anyone wishing to contact the HHS using this means will use their email service provider; this means that no details of the emails are stored on the website or by the website host. The email will be directed to the HHS secretary who will handle it in accordance with the procedures set out in this privacy statement and other internal HHS processes.

What visitor information is collected by the website host

The HHS website does not use cookies or any tracking facilities so ordinarily no details of visitors to the website are recorded. It follows that no attempt is made to identify an individual visitor to the website. The exception to this is if the website developer has to use tracking techniques retrospectively to trace potential malicious activity.

Links to other websites

The website may, occasionally include links to other websites that are relevant to the business of the HHS. If these are used, the visitor should be aware that the HHS has no responsibility for the control, content or handling of personal data by the linked websites.

Data subjects' rights

Everyone (i.e. data subjects) covered by the GDPR has certain rights with regards to the way any business handles personal data. It should be noted that these do not necessarily apply in all situations. For ease of visibility, the rights are listed directly below.

- Right to be informed;
- Right to access;
- Right to rectification;
- Right to erasure ('right to be forgotten');
- Right to restrict processing;
- Right to data portability;
- Right to object; and
- Rights related to automated decision making and profiling (however the HHS does not use these techniques in its decision making).

In addition, a data subject (i.e. a person) has the right to lodge a complaint directly to the Information Commissioner's Office (ICO) without informing the HHS beforehand.

How to raise concerns or make queries about the processing of personal data

If anyone has any concerns regarding the handling of their personal data or would like to exercise their rights, they should contact the Privacy Manager in the first instance using the contact details shown below:

Chair of the Board of Trustees
hnhs@hotmail.co.uk

More information on data protection matters

For more information on UK data protection matters, you may wish to visit the ICO website using www.ico.org.uk.

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