

# Privacy and your Personal Information

**Details what information we collect from you,  
what we do with it, how long we keep it and who it might be shared with**

1. Introduction
3. Your privacy rights
4. What information we collect from you
5. How we gather your personal information
6. How we use your personal information
7. Automated decision making and profiling
8. Our legal basis for using your personal information
9. Sharing your personal information with or getting your personal information from others
10. Transfers outside the UK and the European Economic Area (EEA)
11. How long we keep your personal information for
12. Keeping you up to date
13. Your online activities
14. Changes to this privacy statement

Last Updated: 13/09/2018

## 1. Introduction

- 1.1. We take your privacy seriously and you can find out more here about your privacy rights and how we collect, use, share and secure your personal information. This includes information we already hold about you and information we might collect about you, either directly from you or a third party. How we use your personal information will depend on the products and services we provide to you. It also describes your rights regarding use, access and correction of your personal information.
- 1.2. This Privacy Statement is a public document available to anyone when Rooftop Housing Group obtains and uses their personal information. It explains how we and organisations/people we appoint use your personal information. We obtain your information to carry out our normal business operations as a provider of housing, care and support services. We have a separate privacy statement which sets out how we will obtain and use personal information for job applicants, staff, board members, volunteers and others used by Rooftop Housing Group to provide services.
- 1.3. Our Mandatory Data Protection Officer (MDPO) provides help and guidance to make sure we apply the law to the processing and protection of your personal identifiable information. Our MDPO David Harper, can be reached by email at [dpo@rooftopgroup.org](mailto:dpo@rooftopgroup.org), or by post at Rooftop Housing Group, 70 High Street,

Evesham WR11 4YD if you have any questions about how we use your personal information.

See section 3 [Your Privacy Rights](#) for more information and how our MDPO can help you.

- 1.4. This Privacy Statement provides up to date information about how we use your personal information and this notice updates any previous information we have published or supplied about using your personal information. We will make changes to this Privacy Statement if we make any significant changes affecting how we use your information, and if so we will inform you of these changes in our newsletter, on this website and wherever we collect your data and let you know where you can view or obtain a copy for your records.
- 1.5. This Privacy Statement will apply from 25<sup>th</sup> May 2108.

## 2. Who we are

- 2.1. Rooftop Housing Group (“the Group”) is a non-profit making social business registered with the Regulator of Social Housing (RSH)
- 2.2. Where we refer to “we” or “us” in this Privacy Statement, we are referring to the Rooftop Housing Group or one of our subsidiaries.
- 2.3. The Group consists of three subsidiaries: Rooftop Housing Association Limited, Rooftop Homes Limited and Rooftop Management Limited (dormant). Service delivery within the Group is governed and controlled by a series of intra group and service level agreements that clearly set out the services to be provided by each Company and their rights and responsibilities. Rooftop Housing Group and each of its subsidiaries are “Data Controllers” of your personal data. The data controller is responsible for determining the means of collection and use of this information. Rooftop Housing Group and each of its subsidiaries are registered with the Information Commissioner (ICO) as follows:

<b>Company</b>	<b>ICO Notification Reference</b>
Rooftop Housing Group Limited	Z8858396
Rooftop Housing Association Ltd	Z5172217
Rooftop Homes Limited	Z8859573

## 3. Your privacy rights

- 3.1. From the 25<sup>th</sup> May 2018 you will have the following rights in relation to the control of your personal information:
  - The right to be informed.
  - The right of access.
  - The right to rectification.
  - The right to erasure.
  - The right to restrict processing.

- The right to data portability.
- The right to object.
- Rights in relation to automated decision making and profiling.

This Privacy statement explains these rights.

- 3.2. In brief you have the right to be informed who is obtaining and using your personal information, how this information will be retained, shared, secured and what lawful grounds will be used to obtain and use it. You have the right to object to how we use your information in certain circumstances. You also have the right to obtain a copy of the personal information we hold about you.
- 3.3. In addition, you can ask Rooftop Housing Group to correct inaccuracies, delete or restrict personal data or to ask for some of your personal data to be provided to someone else. You can make a complaint if you feel Rooftop Housing Group is using your personal information unlawfully or holding inaccurate, inadequate or irrelevant personal information, which if used may have a detrimental impact on you or has an impact on your rights.
- 3.4. You can also make a complaint to the data protection supervisory authority, where your personal information is held and processed. If your personal information is held and processed in the United Kingdom you can complain to the Information Commissioner's Office at <https://ico.org.uk/concerns>.
- 3.5. For further information about exercising any of your rights in this Privacy Statement please contact our Data Protection Officer , David Harper by email at [dpo@rooftopgroup.org](mailto:dpo@rooftopgroup.org) or by post at 70 Hight Street, Evesham, Worcs WR11 4YD

#### 4. What information we collect from you

- 4.1. We use a variety of personal information depending on the housing and services we deliver to you. For most housing and services, we need to use the following for you:

##### **Personal information**

- Contact details – name, address, email, home and mobile telephone numbers;
- Age – date of birth;
- Gender
- Identification – information to allow us to check your identity and eligibility for housing;
- Credit information – information about your credit and payment history;
- Financial information – information about your financial circumstances;
- Photograph – information to record your identity;
- Reference information – information to allow us to assess your suitability as an occupant of our homes from third parties;

- National Insurance number – information to enable us contact benefit agencies to speak to them about any universal credit benefits you may be in receipt of or applying for.
- Contact details of next of kin or a nominated representative.

We may collect a reduced subset of this information for the other occupants of your property but we do not collect the following:

- Telephone contact details;
- Photograph.

for the occupants of your property unless they have a direct relationship with us (e.g. applied for housing or obtain services from us directly).

### **Special information**

- Health – to support our housing functions (for example aids and adaptations) and vulnerable customers, more specific details are available if you use services that require this information;
- Race, ethnic origin, religion, sexual life – to support our equality monitoring purposes;

There are other types of special information which we do not collect but are treated as important under the law:

- Trade union membership;
- Genetic data;
- Biometric data (where used for ID purposes)

We may during providing housing and support services be party to information sharing with law enforcement and welfare agencies as part of a multi-agency partnership working jointly on issues of anti-social behaviour and safeguarding, this information is used only to ensure the safety and welfare of our staff and customers and is restricted to staff on a need to know basis, and is regularly reviewed for its relevance, accuracy and ensure it reflects the current situation.

- 4.2. Sometimes where we ask for your personal information to enter into a contract/agreement with you (for example tenancy, lease, application, support and/or care plan agreement) or to meet our legal or regulatory duties (for example to process some housing applications under right to rent, equality monitoring or government and housing regulator reports) we will not be able to provide some of our housing, support or services without this information.

## **5. How we gather your personal information**

- 5.1. We obtain personal by various means, this can be face to face, by email, telephone, our website, correspondence or by receiving this information from others, for example a local elected member who is representing you, police, social care agencies or benefit agencies. We can also receive information about you from other people you know or are linked to you, for example

relative, person nominated by you to act on your behalf or your legal representative. Some further examples are:

- directly from you, for example when you fill out an application, transfer or mutual exchange form or as part of your right to buy application;
- by observing how you use our housing, support and services, or those of other members of Rooftop Housing Group, for example from the transactions and operation of your accounts and on-line services with us;
- from other organisations such as former housing and support providers, health and social care agencies, law enforcement agencies, debt collection agencies, energy and utility companies, benefit agencies or credit reference and fraud prevention agencies;
- from other people you know including joint account holders and people you are linked to or live in the same community as you as regard to reports of anti-social behaviour;
- from monitoring or recording calls as part of any quality and complaint procedures. We record these calls for training purposes and to ensure the safety of our staff. We will not record any payment card details as part of our accounts and payments operations;
- from our CCTV, body worn video (BWV) and audio recording systems for the prevention and detection of crime and anti-social behaviour and lone working devices for the security of our staff and individuals obtaining services from us.

## 6. How we use your personal information

- 6.1. To provide you with our housing service we have a legal duty to confirm a person has the right to reside in the country. We will need to obtain your name, contact details, date of birth, your current and previous countries of residence/citizenship and a copy of identification documents (such as passport, home office residence papers and driving licence).
- 6.2. We may also need to collect proof of your identity and immigration status for the government's Right to Rent legislation.
- 6.3. We might also need health and social care information (such as physical, social or mental health information or medication) to help support our customers who have a vulnerability and/or receive a support or care service from us.
- 6.4. We sometimes need to gather, use and share your personal information for reasons, which are set out below:

***To operate and administer our housing, support and care products and services, including managing and responding to complaints:***

a)	Contact details, household information, accommodation history, conduct of previous tenancies, benefits and income details, health and lifestyle details to assess your eligibility for housing and/or to meet any care or support needs
----	---

b)	We use your name and contact information with third parties who help us deliver our repairs, support, care and housing services. For example, our repairs contractors and their appointed sub-contractors.
c)	Your contact details, health information and next of kin or representative details, for the provision of emergency alarms and monitoring services and assistive technology services.
d)	Information about your health, wellbeing and lifestyle choices and preferences, to be able to provide management, care and support to you or refer you to appropriate support.
e)	Equality and diversity information to monitor access to and take up of our services. This is required for statistical analysis and is aggregated and anonymised.
f)	With your consent, Next of kin or representative details to be able to contact them in an emergency such as when you are taken ill or where we need to contact someone because we need to enter your accommodation to carry out emergency repairs.
g)	Information about your complaints which we may be required to share with your MP, Councillor or recognised Complaints Panel acting on your behalf, as well as with the Housing Ombudsman or Social Housing Regulator.
h)	Information about the behaviour and criminal behaviour, or activity of you, your household or visitors to be able to manage, support or tackle the victims and perpetrators of anti-social behaviour and provide our housing management services. We may share information with the police and other law enforcement agencies for the prevention and detection of crime and anti-social behaviour through CCTV and audio recording devices.

6.5. We use your personal information in this way because it is necessary to meet the conditions set out in the contract/agreement with you and to meet our legal or statutory obligations or because we have your consent.

***To operate and administer payments to and from your accounts or other agencies (for example benefit agency):***

a)	Contact and occupation information with benefit agencies and financial organisations who as agencies or financial organisations help us process payments to your account(s).
b)	To supply our appointed financial advisors' information to carry out home ownership affordability tests to advise on the suitability of a mortgage.
c)	To prevent financial crime including money laundering, benefit or tax fraud or illegal subletting. This includes notifying local authorities and benefit agencies where we believe a household is no longer entitled to benefit or where we have suspicion of benefit fraud.
d)	Your contact details, address and tenancy agreement details to ensure that council tax and utility bills are paid by you or us. We will share your contact details with utility companies and council tax authorities, where

	you have not notified the relevant organisation of your occupation start or end dates.
--	--

We use your personal information in this way because it is necessary to meet the conditions set out in the contract/agreement with you and to meet our legal or statutory obligations and where it is fair for us to do so.

***To carry out our duties under health and safety and to support our vulnerable customers and promote safer communities***

a)	Vulnerability indicators with contractors and sub-contractors to ensure services are tailored to meet your needs.
b)	Warning/Be Aware/Lone Working indicators with contractors and sub-contractors to ensure health and safety measures are in place. We would have informed you of this indicator and when it will be applied and for how long, for example warning marker is applied when an incident has occurred which resulted in a threat by you to a member of staff or one of our contractor's staff.
c)	CCTV and Lone working recordings to protect communities and staff.

We use your personal and special personal information in this way because it is necessary to meet the conditions set out in our legal and statutory obligations regarding health and safety and in the public interest and for the prevention and detection of crime and anti-social behaviour.

***To report or share information with agencies where it is believed you or another person's vital interests are at risk:***

a)	Where you or another person is at risk of physical, mental, sexual, harm or damage. Information may be shared with a health professional, social worker, emergency services or local agencies for Safeguarding.
b)	Where you or another person needs protection as a vulnerable person from significant harm or serious exploitation.

We use your personal and special information in this way because it is necessary to meet our legal and regulatory obligations and to protect yours and others vital interests.

***To carry out our lettings and home ownership affordability assessments , right to buy eligibility assessments and former debt decisions about you:***

a)	Information you give us about your former addresses will be used to carry out a landlord reference check with former landlords to assess your reliability and suitability as a tenant.
----	--

b)	Information about those you are linked with in the proposed agreement or contract with us, for example a joint tenant or owner.
c)	Information about how you or the person linked to you has former debts owing to us or former landlords which may prevent you from obtaining accommodation with us or limit your ability to pay your rent, service charges or other tenancy/property charges.
d)	Information about your current income and outgoings to assess your ability to pay your rent or purchase a home.
e)	For Right to Buy and Voluntary Right to Buy Pilot applicants' we use details of previous tenancies and details of length of residence at the property to assess eligibility . For purchasers', details of income, employment details and other financial details are used to prevent fraud and money laundering.  We also share information on age, ethnicity and household composition and circumstances for policy monitoring purposes with the Ministry of Housing, Communities and Local Government (MHCLG) and third party processors working on behalf of MHCLG and Homes England. We may also share relevant information with other organisations to enable us to process your application.
f)	We may also use credit agencies such as Experian to trace you, if you leave us owing a debt.

For these purposes we share with and receive information from credit reference agencies, debt collection agencies, and other landlords. The credit agency might add details of our search to the records they hold about you, whether your engagement with us proceeds or not. The use of your information is based on our legal obligations and our legitimate interests where it is fair for us to do so.

***To carry out market research and analysis to develop and improve our housing, support and care services:***

a)	Contact and household information, including profile information about those who have direct services from us such as age, gender, ethnicity, religion, disability and economic circumstances. This information may be shared with third party contractors who carry out our research or surveys on our behalf. This information is used to help us ensure we achieve results, which are representative of our customer base.
----	---

***To promote different housing tenures and services of Rooftop Housing Group and its subsidiary companies:***

a)	Photographs and testimonials may be used with your consent marketing and publication materials.
----	---



b)	Where we have your consent, we will use your contact details to contact you about housing options and services we think may be of interest to you.
----	--

***To facilitate and undertake the work of Employment support and training initiatives on behalf of third party agencies:***

a)	Your contact details so we can facilitate training and support.
b)	Details of your educational and training achievements and/or employment status to help us provide training and guidance to you.

We use this personal information in this way because it is necessary to meet the conditions set out in the contract/agreement with you.

## 7. Automated decision making and profiling

7.1. Sometimes we use your personal information in automated processes to make decisions about you, such as credit scoring. We might also use automated processes to create a profile of you. We do this to help ensure decisions are made accurately, fairly and transparently and to offer you housing and services tailored to you.

7.2. We will inform you where your personal information is shared with Experian as part of the 'Rent Exchange Scheme' and we share information as follows:

a)	Information about you to Experian as part of the 'Rent Exchange Scheme' including details of your rent payment history, tenancy start and end date, tenancy reference number, rent and rent balance including any arrears.
----	--

We use this personal information to work with you more closely to manage your existing tenancy agreement. Your track record as a tenant will enable Experian to use the information supplied to them in the future to assist other landlords and organisations to:

- Assess and manage any new tenancy agreements you enter into;
- Assess your financial standing to provide you with suitable products and services;
- Manage any accounts that you may already hold, for example reviewing suitable products and services or adjusting your current product in light of your current circumstances;
- Contact you in relation to any accounts you may have and recovering debts that you may owe;
- Verify your identity and address to help them make decisions about services they offer; and

- Help prevent crime, fraud and money laundering.

## 8. Our legal basis for using your personal information

8.1. We only use your personal information where it is allowed by the laws that protect your privacy rights. We only use your personal information where:

- we need to use the information to comply with our legal obligations;
- we need the information to perform a contract with you; and
- it is fair to use the personal information either in our interests, or someone else's interests, where there is no disadvantage to you – this can include where it is in our interests to contact you about housing products and/or services, market to you, or collaborate with others to improve our services;
- where we need to ask for your consent (if consent is needed);

Where we have your consent, you have the right to withdraw it. We will let you know how to do that at the time we gather your consent. See section 12 Keeping you up to date for details about how to withdraw your consent to marketing.

8.2. Special protection is given to certain kinds of personal information that is more sensitive. This is information about your health status, racial or ethnic origin, political views, religious or similar beliefs, sex life or sexual orientation, genetic or biometric identifiers, trade union membership or criminal convictions or allegations. We will only use this kind of personal information where:

- we have a legal obligation to do so (for example to protect vulnerable people);
- it is necessary for us to do so to protect your vital interests (for example if you have a severe and immediate medical need whilst on our premises);
- it is in the substantial public interest;
- it is necessary for the prevention or detection of crime;
- it is necessary for insurance provisions; or
- you have specifically given us 'affirmative' consent to use the information.

## 9. Sharing your personal information with or getting your personal information from others

- 9.1. We will share personal information within our Rooftop Housing Group and with others outside the Group where we need to do that to make housing and services available to you, market housing and services to you, meet or enforce a legal obligation or where it is fair and reasonable for us to do so. **See section 6 [How we use your personal information](#)** for more information.
- 9.2. Who we share your personal with depends on the housing products and services we provide to you and the purposes we use your personal information for. For most housing products and services, we will share your personal information with our own service providers such as our maintenance contractors, IT providers, and with credit reference and fraud prevention agencies. **See section 6 [How we use your personal information](#)**, on who we get your personal information from and why.
- 9.3. Most of the time the personal information we have about you is information you have given to us or gathered by us while providing products and services to you. We also sometimes gather personal information from and send personal information to third parties where necessary for credit checking and fraud prevention or marketing purposes, for example so we can let you know of housing options or services we think you might be interested in. **See section 6 [How we use your personal information](#)**, for more information on who we get your personal information from and why.

## 10. Transfers outside the UK and the European Economic Area (EEA)

- 10.1. We may need to transfer and process your personal information outside the UK and EEA to companies, information technology service hosting providers, agents and subcontractors in countries where data protection laws may not provide the same level of protection as those in the EEA, such as the US.
- 10.2. Where we do this, any personally identifiable information will be limited to what is necessary to carry out the processing required, and we will make sure that suitable safeguards are in place, for example by using approved contractual agreements and requiring the recipient to subscribe to or be certified with an 'international framework' of protection.

## 11. How long we keep your personal information for

- 11.1. How long we keep your personal information for depends on the housing options and services we deliver to you. We will never retain your personal information for any longer than is necessary for the purposes we need to use it for.

## 12. Keeping you up to date

- 12.1. We will communicate with you about housing options and services we are delivering using any contact details you have given us – for example by post, email, text message, social media and notifications on our app or website.
- 12.2. Where you have given us consent to receive marketing, you can withdraw consent and update your marketing preferences by visiting our website or writing to us, calling us directly. For contact details, visit our website [www.rooftopgroup.org/contact us](http://www.rooftopgroup.org/contact-us).

## 13. Your online activities

- 13.1. Like most websites, each time you visit our site we automatically collect certain data relating to your browsing behaviour on the site including, but not limited, the webpage from which you came from and your IP address. Rooftop Housing Group uses third party software for analytics. All metrics information collected from your usage of the Service(s) will be transmitted to the analytics provider. The analysis tools measure and observe your behaviour (what you do) while the feedback tools allow us to hear what you have to say. This information is then used to understand (evaluate) how users use our website and produce statistical reports on activity for us. We will use this information, so our website can be improved, by making them more user-friendly, more valuable and simpler to use. Third party analytics software will not share your personal data or link (associate) your personal data with any other data held on them.

### 13.2. Cookies

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

### 13.3. Links to other (third party) sites

Our Website may contain links to other websites that are not owned or controlled by Rooftop Housing Group. Please be aware that we are not responsible for the privacy practices of such websites or third parties. We encourage you to be aware when you leave our Website and to read the privacy policies of each website that collects personal information.

### 13.4. Website registration and web forms

When you register to the site, you may be asked to submit personal information about yourself to register and/or download content. This information may include, but it is not limited to, your name, address and telephone number. We will only collect information that is necessary for us to provide you with any services or assistance connected with that content. If you would like more information on our services, do get in touch by completing our online enquiry form.

## 14. Changes to this privacy statement

This statement will be reviewed regularly and may change. We will display the new statement in all the places where it can usually be found, such as on our website and at our offices.