

Victory Privacy Notice (third parties incl. household members) under the General Data Protection Regulations

What this leaflet is about?
Who are we?
Why do we collect your personal information?
What personal information do we collect?
How do we use your personal information?
Who do we share your personal information with?
How long do we keep your personal information?
How do we keep your personal information up to date?
Your Rights under the General Data Protection Regulations
If you wish to make a Complaint
If you wish to Contact Us

What is this leaflet about?

This privacy notice gives you information on how Victory Housing Trust processes and protects your personal information in accordance with current data protection legislation.

We will regularly review and make necessary changes to the services and information handling processes when you, the law or the Information Commissioner's Office (ICO) request such changes.

This privacy notice was last updated in January 2019

Who are we?

Victory Housing Trust is a Registered Provider regulated by the Regulator of Social Housing.

Our normal activities can be summarised as

- providing affordable and other types of housing
- property and grounds maintenance, repair and improvements
- managing your housing, tenancy/lease and account as your landlord
- offering opportunities to be involved

We also provide additional services including

- organising and assisting community events
- providing welfare, benefits and debt advice
- adaptations made to the properties we manage

In this notice, whenever you see the words 'we', 'us', 'our', or 'Victory' it refers to Victory Housing Trust. Our ICO registration number is Z1640468.

Why we collect your personal information?

Victory Housing Trust has certain obligations under the law when servicing an appointment of employment, tenancy or while giving or receiving services. The information we hold allows us to perform our functions as an employer and/or landlord.

This may include the following

- to check your identity when you contact us
- to administer services Victory is providing

- for our own internal administrative purposes
- to provide you with advice and support that you have requested or been referred to
- to manage your communication preferences
- to comply with applicable laws and regulations and requests from statutory agencies
- to contact you about a tenant or member of staff who has given us consent to do so

If we wish to process your information for reasons other than those stated we will obtain your consent prior to proceeding.

What personal information could we collect?

- your full name
- contact details (including your postal address, telephone number(s) and email address)
- date of birth
- national insurance number
- your bank details, if applicable
- records of your correspondence and engagement with us
- images, video and/or audio recordings
- other information you share with us
- housing benefit and/or universal credit details
- if you have had any help from our Tenancy Support Team
- if you have been involved in any anti-social behaviour instances we are aware of
- relationship to staff and/or residents
- **Special Category Data**
We may collect information that could reveal your race; ethnic origin; political beliefs; religion; trade union membership; health; sex life; or sexual orientation. We only collect this information where you have given your explicit consent, it is necessary, or you have deliberately made it public.

The information collected will be provided by

- you
- a Victory tenant
- a Victory employee
- the person that you are assisting/acting on behalf of

In certain circumstances we may also be given information from Local Authorities, Department of Work and Pensions, and other agencies we may be in contact with.

We do not normally process data on residents under the age of 18 that live in our properties. However, we will record basic information, including their name and date of birth. This is required for checking the property is not overcrowded and to assess other tenancy management issues where all householders and ages are required to be known.

We may receive children's information if we are involved in the housing and tenancy aspects of a welfare case as part of a multi-agency working solution

How do we use your personal information?

When processing your information for requests and sharing, storing and protecting your personal information, we will ensure we do so with honesty and respect. We will comply with data protection laws and work in partnership with you and the ICO when processing your information.

The information we hold allows us to perform our functions as a Registered Provider and Employer and we will need to process your information because of your specific relationship with us.

We will keep all your information including notes, letters and information given to us about you in a confidential record that is specific to you. This is stored on our Contact Management System, and, in some cases in paper files. We may also store your information in other electronic formats. This information is to help provide necessary advice, guidance and support. We take information security very seriously and access to personal information is restricted.

When you provide any special category data you explicitly agree that we may collect and use it in order to provide our services and in accordance with this Privacy Policy. Being unable to process this information may mean we are unable to provide all or parts of the services you have requested from us.

Calls to and from Victory Housing Trust are recorded. These recordings are used for training purposes, quality assurance, complaint investigations and to make further improvements to the service we provide to you.

Where there is CCTV and audio equipment at Victory Housing Trust's premises relevant signs will be displayed. These recordings are used for security purposes and safety measures.

To ensure that our services meet a high standard of quality, our files are sometimes checked by our quality assurance staff. Files may also be checked by external auditors who are bound by confidentiality policies.

We may use your data for statistical reports. These statistics will not include any information that could be used to identify any individual.

Who do we share your personal information with?

Limited information will be shared with our repairs and maintenance contractors to enable them to contact you and in order to keep both you and them safe when they visit.

We may use third-party suppliers to manage mailings and for credit references and payment collection.

We actively screen and monitor these companies to maximise the protection of your privacy and security. They are only permitted to use the data in accordance with relevant data protection legislation, under strict instructions from us, and in accordance with a contract/legally binding agreement entered into between Victory Housing Trust and the supplier.

Where we are legally required to do so we will share information in the following circumstances:

- prevention or detection of crime
- apprehension or prosecution of offenders
- assessment or collection of tax or duty owed to customs and excise
- in connection with legal proceedings
- to comply with the law

How long will we keep your personal information?

We will keep the information we hold for as long as we need it to deliver Victory services and/or legal responsibilities and in accordance with our retention policy.

How do we keep your personal information up to date?

- when you contact us we may ask you if certain information is up to date.
- if you have told us of additional needs we will check this regularly

Your Rights under GDPR

You have many rights under data protection legislation including, in certain circumstances

- to ask us for access to information about you that we hold
- to have your personal data rectified, if it is inaccurate or incomplete
- to request the deletion or removal of personal data unless there is a compelling reason for its continued processing, for example if we are required to retain it for statutory purposes, or to protect our legal interests
- to restrict our use of your personal data (i.e. permitting its storage but nothing further), although in some cases we will not be able to restrict our uses of your information, for example if we are required to process it for statutory purposes or to protect our interests
- to object to certain ways we use your information
- not to be subject to decisions made automatically through the use of technology and with no human consideration where it produces a legal or similarly significant effect on you
- to request that we transfer your information directly to a new landlord or other third party.

Further information about your data protection rights appears on the Information Commissioner's website at <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to make a Complaint

If you have any complaints about the way in which we have used your data, please get in touch with us. We would be happy to help and discuss your concerns.

In addition, you are also entitled to make a complaint to the Information Commissioner's Office Wycliffe House Water Lane Wimslow Cheshire SK9 5AD (0303 123 1113). Alternatively you can visit the ICO website <https://ico.org.uk/>

If you wish to Contact Us

If you have any questions about this notice, would like more information or want to exercise any of the rights above please contact us by:

- email - dataprotectionteam@flagship-group.co.uk
- writing to - the Data Protection Team, Flagship Group, 31 King Street, Norwich, NR1 1PD
- telephone - 0330 123 1860

If you would like this information in Braille, large print, audio or a different language please contact us on 0330 123 1860 or email us at info@victoryhousing.co.uk.