

## Leaseholders

This section will detail what personal information we collect about you and use if you are a leaseholder or commercial leaseholder with us.

### What personal data will we collect?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

This section will detail what personal information we collect about you and use if you are an existing tenant.

**"Identity Data"** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, nationality and gender.

**"Contact Data"** includes correspondence address, email address and telephone numbers, and previous address data.

**"Language Data"** include information about your language needs

**"Financial Data"** includes bank account and payment card details.

**"Eviction Data"** details around any previous eviction.

**"Reference Data"** details received from a referee provided

**"Relationship Data"** details of relationship with other tenant

**"Armed Services Data"** details around any service in the armed forces

**"Benefits and Pensions Data"** details of any benefit and pension received

**"User Data"** customer self service log in and account details

**"Tenancy data"** information relevant to your tenancy with us

**"Complaint data"** information relevant to a complaint that you make

### What special categories of personal data will we collect?

Sometimes we will ask for or obtain special categories of information (information relating to your health, genetic or biometric data, criminal convictions, sex life, sexual orientation, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership) because it is relevant to the housing services we provide to you or information regarding criminal convictions for the purposes of preventing, detecting and investigating fraud. The types of special categories of personal data or information regarding criminal convictions that we may collect include;

Health data, for example, medical conditions and whether any member of the household is pregnant

Details of any disability or vulnerability

Details of any previous harassment

Details of criminal convictions and/or anti-social behaviour

Details of ethnicity

## What will we use your personal data for?

Once you are a tenant with us we will use your categories of personal data and sensitive personal data set out above in order to provide our services and other related services to you.

We have set out below, in a table format, a description of the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>To manage your tenancy, this includes:</p> <ul style="list-style-type: none"> <li>(a) Provision, maintenance and termination of the accommodation</li> <li>(b) Management of payments, fees and charges</li> <li>(d) Universal credit registration, claim and support</li> <li>(e) Support with independent living</li> <li>(e) Anti-social behaviour recording and police referrals</li> <li>(c) Collecting and recovering money owed to us</li> </ul> <p>To manage our relationship with you which will include:</p> <ul style="list-style-type: none"> <li>(a) Notifying you about changes to our terms or privacy policy</li> </ul>	<p><b>Personal Data</b></p> <ul style="list-style-type: none"> <li>(a) Identity data</li> <li>(b) Contact data</li> <li>(c) Language data</li> <li>(d) Financial data</li> <li>(f) Relationship data</li> <li>(e) Benefits and Pensions data</li> <li>(g) User data</li> <li>(h) Tenancy data</li> <li>(i) Complaint data</li> </ul>	<p>Some personal data must be processed in order for us to take steps at the request of the you prior to entering into a contract and then when we have entered into a contract with you (i.e. a tenancy agreement)</p> <p>In other circumstances it is necessary for the legitimate interests of us in order to assess the suitability of the accommodation, provide you with appropriate accommodation and access and provide appropriate support.</p> <p>In certain circumstances we will process the personal data in order to comply with our legal and regulatory obligations (such as in relation to fraud and universal credit), and acting in the public interest</p>

<p>(b) Asking you to leave a review or take a survey  (c) Undertaking tenancy audits  (d) Complaints and collective disputes</p> <p>To provide you with services related to your tenancy;</p> <p>(a) Safeguarding of both adults and children  (b) Lifeline services  (c) Community Development Fund Applications</p>	<p><b>Special Categories of Personal Data</b></p> <p>(k) Health data  (l) Disability or vulnerability data  (n) Criminal convictions and/or anti- social behaviour data  (o) Details of ethnicity</p>	<p>We minimise our holding and use of sensitive categories of personal information but, given the services we provide, there are times when we use it to ensure that we understand your needs (for example when providing accommodation for disabled persons, or persons with risks relating to medical conditions, harassment or in relation to criminal activity and safeguarding) and in order to help you access care services.</p> <p>We will usually be processing this information to allow us to comply with our legal obligations, act in the substantial public interest in relation to the services we provide, to provide you with social care, or to deal with any legal action. There may be times where we need to ask you for your consent to use this type of personal information, in which case we will always notify you and make this clear.</p>
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