

## **PINECREST HOUSING LTD (PHL)**

### **PRIVACY POLICY**

#### Privacy policy: How We Use Your Information

PHL holds some personal information that you have given us. We will keep this safe and secure in line with the General Data Protection Regulations (GDPR). We only hold information that we need to carry out our role as your landlord. There may be occasions when we need to share this information with other organisations in order to deliver a full range of services to you.

This policy explains what information we collect and why, who we may share it with, how long we keep it, what your rights are in relation to it, and how you can contact us or the Information Commissioners Office (ICO) if you have any questions or complaints.

#### Information We Collect & Why

Most of the information we collect is to help us meet our obligations as your landlord and so comply with the tenancy agreement. We need this information to make sure we can provide a service to you, meet your accommodation needs, and meet any individual needs you may have in terms of the way we communicate with you. We will keep this information for the length of your tenancy, and for up to six years afterwards. This will include:

- Personal information: name, address, date of birth
- Contact details: home phone number, mobile phone number, email address
- Further details: National Insurance Number, Housing Benefit Reference Number, etc.
- Sensitive personal information: gender, ethnicity, disability information, medical details, marital status, sexuality
- Household information: details of other family members who will be living in your home
- Nationality / immigration status: visa conditions, asylum status, etc.
- Images: photographic identification,
- Employment status
- Income information
- Criminal record declaration
- Bank account details
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We will record additional information during the course of your tenancy so that we have a record of our contacts with you. This will only include factual information such as:

- Records of visits, phone conversations, emails, letters, etc.
- Records of repairs carried out at your home
- Audio recordings of your calls into our office
- CCTV images, event photographs or video recordings
- Complaints records

- Anti-social behaviour reports, witness statements and risk assessments
- Your rent payment history
- Unacceptable behaviour warnings where we have evidence that you may pose a risk to our colleagues or contractors
- Survey data

There are three other reasons we might use your information.

#### Legal

There may be occasions where we have to use your information because there is a legal obligation on us (as a registered social housing provider) to do so. This may include:

- Providing information to the Local Authority in relation to Council Tax
- Providing information to the benefits agencies in relation to
- Providing information to the Police in relation to criminal investigations
- Providing information to Social Services if we believe you, or a member of your household is at risk
- Providing information to the Home Office if we have good reason to believe that an illegal immigrant is living in one of our properties

#### Partner Agencies

There are a number of organisations who we might share your information with because they provide services on our behalf, and so they will need to get in touch with you from time to time. We will not use an organisation unless they sign up to a contract which sets out our expectations in relation to them keeping your information safe. This list of organisations may include:

- Repairs contractors
- Compliance contractors such as our gas service engineers or our electrical engineers
- Investment contractors – such as the companies who replace your kitchens, bathrooms, etc.
- Services
- The final reason we might use your information is to offer you services that we believe are relevant, helpful and related to our main purpose; in other words where we think we have a legitimate interest in working with you. This might include for example:
  - Helping you to access employment or education opportunities
  - Assisting you to access financial support or additional benefits that you may be entitled to
  - Promoting community events that may help you to integrate with your neighbours
  - Sending you newsletters or leaflets to give you information about our services

### Keeping Your Information Safe

We are committed to ensuring the highest level of security for all information. When you contact us, you will be asked to verify yourself by asking some security questions; this is to make sure we don't give your personal information to anyone else by accident. If you want a relative or a support worker to be able to talk to us on your behalf, we will need you to sign an advocate agreement which gives us your consent to do so.

### Your Rights

Under data protection law, you have a number of rights that you can exercise if you are unhappy with the way your data is being used, or wish to know more about the data we hold about you. Where you contact us about one of the following rights, we will action your request within 1 calendar month unless the request is complicated or large scale – in which case we may contact you to notify you if we require an additional month to comply with your request. There is no charge associated with any of these rights.

#### Details of your rights:

- Right to withdraw consent (as to processing of your personal data)
- Right of access (to receive a copy of your personal data)
- Right to rectification (to request that inaccurate data is corrected)
- Right to request erasure (that data is deleted)
- Right to restrict processing (to request we don't use your data in a certain way)
- Right to data portability (in some cases, you can ask to receive a copy of your data in a commonly-used electronic format so that it can be given to someone else)
- Right to object (generally to make a complaint about any aspect of our use of your data)
- Right to explanation (if there is any automated decision-making based on your data you have the right to an explanation as to how it works)

Where personal data is being processed on our behalf by any third party companies, we will notify them if you exercise any of the rights above to ensure that they comply with your request.

#### Policy Review

We will review this policy at least once every two years to make sure it remains relevant and accurate. Our reviews will take account of customer complaints, stakeholder feedback, and changes in legislation, regulation or sector best practice.

Version	Checked By	Amendments	Approved By	Date of Approval	Published by	Date of Review
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