

Grosvenor Hart Homes Tenant Privacy Notice

Grosvenor Hart Homes tenant privacy notice

There are two data controllers for the purposes of the Data Protection Act and the General Data Protection Regulation, depending upon the type of tenant:

- Market rent tenants: GHH (POC) Limited of 70 Grosvenor Street, London, W1K 3JP; and
- Affordable housing tenants (who come under the remit of the regulator of social housing): Grosvenor Hart Homes Limited of 70 Grosvenor Street, London, W1K 3JP

'We' and 'Us' means both and GHH (POC) Limited and Grosvenor Hart Homes Limited.

We strongly believe in protecting your privacy and the confidentiality of your personal information. To explain how we collect, use and protect personal information in connection with tenant management we have developed the following privacy notice.

This privacy notice applies to tenancy applicants, tenants, former tenants, and owners of 'enfranchised' properties.

Contact details

You can contact us with any questions you may have about privacy and/or data protection. Our contact details are: hello@grosvenorhart.com

About this privacy notice

We collect personal information as part of the tenant application process, and if you become a tenant, during your tenancy. We explain in detail below the types of information that we collect, how and why we use that information, and what rights you have in connection with your personal information.

We must have a lawful basis to process your personal information, and this notice explains what our lawful basis is in respect of each purpose for which we keep and use personal information about you. Generally, we are allowed to process your personal information where it is necessary in connection with a contract between us (such as a lease or maintenance agreement), where it is necessary for us to comply with our legal obligations as your landlord, or where we have a legitimate interest to do so (but we will always consider whether your right to privacy overrides our interest).

What personal information do we collect about you and how do we collect it?

We will require you to provide certain personal information to us where it is necessary, both as part of your tenancy application and if you are a tenant, in connection with your tenancy contract. If you fail to provide certain personal information when requested, we may not be able to offer you a tenancy contract, perform the contract if we have entered one with you, or comply with our legal obligations.

We may collect personal information through the application process, either directly from applicants or a background check provider. We also may collect additional personal information from third parties including councils, employers, credit reference agencies and/or other background check agencies.

We may collect additional personal information as required.

When you contact us for the first time and as part of the application process

We may collect and use the following personal information about you:

- Identification and contact information, such as your full name, date of birth, age, postal address, email address and telephone number

For housing management purposes

We may collect and use the following personal information about you, so that we can understand you and your needs to help tailor our service to you:

- Your housing needs so we can find a property that suits you when available
- Information about you, your family, and aspects of your life such as independent living skills, managing finances, managing relationships
- Information about your employment and/or training, including your employment status, salary, job title
- Benefit and council tax information to verify circumstances
- Information about any outstanding County Court Judgments (CCJs) against you
- Support provided by a local authority and/or other statutory services
- Housing history
- Financial information, such as your bank account details
- Confirmation of your right to live in the UK, references and other information required as part of the application process
- Identification documents, such as your driving licence or birth certificate
- Information that you provide to our staff relating to your tenancy and property management
- Feedback from our contractors
- Video recordings such as CCTV for safety and crime reduction purposes

If appropriate we will collect sensitive information about you such as ethnicity, religion, sexual orientation, physical and mental health, and criminal offences. For further information about this, please see information on 'Sensitive personal information' and 'Information about criminal convictions' under the section on 'How we use your personal information'.

We may also collect personal information of other people associated with you, such as other members of your household, dependants, your next of kin, and emergency contacts.

Improving your experience

We are committed to improving your experience with us and from time to time we will process your information to carry out tenant feedback exercises, newsletters, and service information.

You can provide details of friends, relatives, or neighbours who you trust to contact us on your behalf.

With your consent we may use your name, photo, video, and experience with us for brochures, advertising, or press releases.

We will process your personal information if you contact us with compliments and/or complaints about our services.

With your agreement, we may also use your personal information as part of an independent evaluation on how we can improve outcomes for children, young people and families. If you agree then this will be shared with our evaluators as anonymised information. This means that it will be impossible to identify you.

If you attend our events, we may contact you for feedback on how they have helped you.

In relation to anti-social behaviour

We will process your personal information if you contact us with details of anti-social behaviour.

Additional services

We pride ourselves on being active in the communities we work in. Your personal information may be used for our services within localities.

We may collect and use the following personal information about you:

- If you ask for care support requirements, detailed information about your needs or your family needs
- If you contact us about money problems, detailed information about your income and debts
- If you participate in any of our involvement or community projects

Personal information we collect about you from other sources

We may collect personal information about you from other sources. This may include the following:

- Under certain circumstances from the police, probation services, social care services, disclosure, and barring service and/or court service
- Publicly available information, from sources such as Companies House, the Electoral Roll, County Court Judgments, decrees for payment, and repossessions this may include details about your home, household, vehicles, financial situation, and debts
- Information you have shared publicly, including on social media
- Information from third party databases or data suppliers, such as commercial property sites, auction sites and credit reference agencies, including details about your home, belongings, and creditworthiness
- Information provided to us in relation to your health, where we have a requirement to support you as a landlord (see 'Sensitive personal information' below)

This list is not exhaustive. In specific instances, we may need to collect additional personal information for the purposes set out in this notice.

We may collect personal information about you from third parties, including the police, the council, organisations who let and manage our properties and organisations who provide professional advice and support regarding social housing management, to identify if you are a suitable prospective tenant and/or ensure your support needs are appropriately met.

How do we use your personal information?

Legal basis to use your personal information

We have set out in the table below how and why we use your personal information, and what our legal basis is to be able to use your personal information in each way. The principal legal bases on which we use your personal information are as: (a) to Allow us to enter into and perform a contract, (b) to enable us to comply with legal obligations, and (c) to pursue legitimate interests of our own or those of third parties (provided your interests and fundamental rights do not override those interests).

Basis for processing personal information	Allow us to enter into and perform contract	Enable us to comply with legal obligations	In order to pursue legitimate interests of our own or those of third parties (provided your interests and fundamental rights do not override those interests)
Administering a tenancy if we have entered into one with you	X		
Checking you are legally entitled to reside in the UK		X	
Complying with our health and safety obligations	X	X	X
Dealing with any complaints you may have	X	X	X
Dealing with legal disputes involving you, or other tenants or other residences, including accidents	X	X	X
Determining the terms on which you will be granted tenancy	X		
Management and planning, including accounting and auditing		X	X
Making a decision about your application for a tenancy	X		
Making decisions about rent reviews	X		X
Making decisions about your continued residency	X		X
Making arrangements for the termination of your tenancy or residency	X		X
Making repairs, alterations, and improvements to your property	X	X	X
To detect and prevent fraud, money-laundering and other crimes		X	
To interact and respond to any communications you send us, including social media posts that you tag us in			X

To let you know about any important changes to our business or policies			X
---	--	--	---

Telling you about events and activities that we think may be of interest to you

We may use your personal information to identify and tell you about events and activities that we think may be of interest to you. We will only do this by email where you have informed us that you would like to receive these communications via email. Whether you choose to receive this information via email is entirely up to you. Your choice will not affect your tenancy. You can update your preferences by responding to our emails to you, or by contacting us (see contact details above).

We may also use your information to invite you to participate in market-research. If we do contact you about market-research, you do not have to participate if you tell us that you do not want to.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Sensitive personal information

Sensitive Personal information, such as ethnicity, religion, sexual orientation, and physical and mental health requires higher levels of protection. We need to have further justification for collecting, storing, and using this type of personal information. We may process this personal information in the following circumstances:

- With your explicit written consent
- Where we need to carry out our legal obligations and in line with this privacy notice
- Where it is needed to assess any special requirements you may have due to any disabilities or health issues you may have, subject to appropriate confidentiality safeguards

Less commonly, we may process this type of personal information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the personal information public.

Information about criminal convictions

We may only use personal information, relating to criminal convictions where the law allows us to do so. We may use this information:

- in connection with the application process to assess your suitability for a tenancy agreement; or
- in limited circumstances, with your explicit consent.

Where we process such information, it shall be in accordance with this privacy notice and subject to appropriate safeguards.

Violent or abusive behaviour

If you are violent or abusive to our employees and/or other tenants, we may decide to place a warning marker on your record. If we do this, we will tell you and explain why. We will also share this information with any of our partners such as contractors.

Who do we share your personal information with?

Sharing your personal information within Grosvenor Hart Homes

Your personal information will only be shared with employees as are reasonably necessary for these purposes and on a need to know basis.

Sharing your personal information with third parties

We may need to share your personal information with certain third parties, including third-party service providers, and we require third parties to respect the security of your personal information and to treat it in accordance with the law.

We may need to share your personal information with third parties where required by law, as part of the assessment process, administer your tenancy, support our relationship with you or where we have another legitimate interest in doing so. The following activities are carried out by third-party service providers:

- Councils, government departments and the NHS
- External agencies if we need to recover any debts when you leave your tenancy
- Letting and managing our properties
- Police for crime prevention or detection, resolutions of complaints or other issues
- Providing professional advice and support regarding social housing management
- Providing standard safety measures for our employees
- Undertaking property compliance requirements
- Undertaking maintenance and repair to our properties
- Utility companies

There are also certain exceptional circumstances in which we may disclose your personal information to third parties. This would be where we believe that the disclosure is:

- Required by the law, to comply with judicial proceedings, court orders or legal or regulatory proceedings
- Required due to the collection of debt and/or and tracing agencies
- Required due to planning and/or building requirements
- Required due to environmental schemes and designations
- Required if we need to locate you but you are no longer residing at your last known address, or with whom contact has been lost
- Necessary to protect the safety of our employees, our property or the public
- Necessary for the prevention or detection of crime, including exchanging personal information with other companies or organisations for the purposes of fraud protection and credit risk reduction

We may share personal information about you with other third parties, including the police, the council, organisations who let and manage our properties and organisations who provide professional advice and

support regarding social housing management, to identify if you are a suitable prospective tenant and/or ensure your support needs are appropriately met.

How long do we keep your personal information?

Tenant application not progressed

If you do not become a tenant or decide you no longer want to take up a tenancy, then we will not retain your personal information.

Tenancy information

Once you have ceased being a tenant, we will retain very limited personal information indefinitely, for the purposes of keeping and maintaining our historical records. Please note that these records will remain confidential for a period of 100 years.

All other personal information will only be kept for 6 calendar years after a tenant has vacated.

There are several exemptions to the 6-calendar year retention period after the tenant has vacated:

- If there is a financial charge on the property after the tenant has vacated, the personal information will be kept for 6 calendar years after the charge has been removed
- If the tenancy is transferred to a partner or other family member, the personal information will be kept for 6 years after the new tenant has vacated
- The tenant dies and there is a dispute about payments; etc., the personal information will be kept for 6 years from when the dispute is reconciled

Social care support

Social care support and safeguarding, including multi-agency meeting notes and referrals and care leavers personal development, will only be kept for the duration of the tenancy.

Income and welfare benefit provisions

Any information that we require, to determine your income and welfare benefit, will only be retained for 2 years after it has been provided.

CCTV recordings

These will be kept for 30 days, unless required for evidential purposes.

Anti-social behaviour

We will keep reports of anti-social behaviour that is reported to us for a minimum of 5 years from when it has been reported or until any legal action has ended.

Complaints

We keep complaints for a minimum of 6 years from the date of the complaint or for a minimum of 10 years if they have been escalated to the Housing Ombudsman.

How do we protect your personal information?

We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this notice.

All personal information you provide to us is stored securely, including in a physically secure environment, on our secure servers.

Access to your personal information will be restricted to such employees and other individuals as are necessary for the purposes for which the information was collected.

Due diligence has been carried out to ensure that those who are letting and managing our properties are compliant with data protection and information security requirements.

What rights do you have in respect of your personal information?

You have the right to be informed

We have a legal obligation to provide you with concise, transparent, intelligible, and easily accessible information about your personal information and our use of it. We have written this notice to do just that, but if you have any questions or require more specific personal information, you can contact us (see contact details above).

You have the right to access your personal information

You have the right to ask us to confirm whether or not we hold any of your personal information. If we do, you have the right to have a copy of your information and to be informed of the following:

- Why we have been using your personal information
- What categories of personal information we were using
- Who we have shared your personal information with
- How long we envisage holding your personal information

To maintain the security of your personal information, we will have to verify your identity before we provide you with a copy of the information we hold.

You have the right to correct any inaccurate or incomplete personal information

You have the right to amend any inaccurate personal information about you which we hold. If you need any support, please contact us (see contact details above).

You have the right to be forgotten

There may be times where it is no longer necessary for us to hold personal information about you. This only relates to the following:

- The personal information is no longer needed for the original purpose that we collected it
- You withdraw your consent for us to use the personal information (and we do not have another lawful reason to use it)
- You object to us using your personal information and we have no overriding reason to keep using it
- We have used your personal information unlawfully
- We are subject to a legal requirement to delete your personal information

In these situations, you have the right to have your personal information deleted. If you believe one of these situations applies to you, please contact us (see contact details above).

You have the right to have a copy of your personal information transferred to you or a third party in a compatible format

Also known as Data Portability, you have the right to obtain a copy of your personal information for your own purposes. This right allows you to move, copy or transfer your personal information more easily from one IT system to another, in a safe and secure way. This right shall only apply where:

- we are processing your personal information for the purposes of entering into or performing a contract; or
- you have provided consent for us to process your information.

If you would like us to transfer a copy of your personal information to you or another organisation in a structured, commonly used, and machine-readable format, please contact us (see contact details above).

You have the right to object to receiving emails from us about events and activities

You can tell us at any time that you would prefer that we do not use your email address to be contacted about events and activities. If you would like to stop receiving emails about events and activities, please contact us (see contact details above) or respond to the emails that we send, and we will stop sending these immediately.

You have the right to object to us using your personal information for our own legitimate interests

Sometimes, we use your personal information to pursue our own legitimate interests, or those of third parties (please see 'How do we use your personal information?' above for more information about such interests).

We aim to always ensure that your rights and personal information are properly protected. If you believe that the way we are using your personal information is not justified due to its impact on you or your rights, you have the right to object. Unless we have a compelling reason to continue, we must stop using your personal information for these purposes.

To exercise your right to object to our use of your personal information for the purposes above, please contact us (see contact details above).

You have the right to restrict how we use your personal information

You have the right to ask us to stop using your personal information in any way other than simply keeping a copy of it. This right is available where:

- You have informed us that the personal information we hold about you is inaccurate, and we have not yet been able to verify this
- You have objected to us using your personal information for our own legitimate interests and we are in the process of considering your objection
- We have used your personal information in an unlawful way, but you do not want us to delete your personal information
- We no longer need to use the personal information, but you need it for a legal claim

If you believe any of these situations apply, please contact us (see contact details above).

Complaints

If you wish to make a complaint about our collection or use of your personal information, please contact us (see contact details above) in the first instance so that we may seek to resolve your complaint or visit the Complaints page on our website.

If you are not satisfied with our response, you have the right to lodge a complaint with the Information Commissioner's Office (ICO), the statutory body which oversees data protection law in the UK. This is the link to the [ICO website](#) if you wish to lodge a complaint with the ICO.

Review schedule

This Policy will be reviewed every three years unless changes to internal policies or legislation require a review to be carried out sooner.

Author(s) name(s) and job title(s):	Sarah Dean, Finance Director
Version number:	v1-0
Date approved:	04/07/2024
Approved by:	Karl Dean, Housing Director
Date of next review:	04/07/2027