### Data Protection and Privacy Notice

#### **General Data Protection Regulation – Information**

### **Fair Processing Notice**

As a social housing landlord, "the Co-operative" ) collects, holds and processes a considerable amount of information, including personal information about residents, people it provides services to, and other people. It does this to provide its services in the most effective and efficient way that it can.

The Co-operative recognises that it has a duty to people whose information it holds to treat that information responsibly, keep it safe and secure, and process it correctly and proportionately. This policy broadly explains what information we collect, the purpose for processing, categories of personal information and who we may share it with.

To understand how your own personal information is processed you may need to refer to any personal communications you have received, check any privacy notices the Co-operative has provided or contact the Co-operative directly to ask about your personal circumstances.

#### **Identity and contact details**

Ladybur Housing Co-operative are registered as a Data Controller under the General Data Protection Regulation and Data Protection Act 2018. Our contact details are:

Data Protection Officer

Ladybur Housing Co-operative Ltd. Ladybur House, Burbridge Way, London N17 9GY

#### How we collect your information

In order to fulfil our functions as a social housing landlord, as well as pursue other lawful/ legitimate interests on behalf of our residents and service users we collect information about individuals in a number of ways, for example, by letter, email, face-to-face, telephone, online forms, social media and through referrals made by third parties, and other key stakeholders acting jointly or on behalf of Ladybur Housing.

#### **Purpose for processing your information**

We may collect personal data about you which covers basic details such as name, address, telephone number, and date of birth. We also collect some sensitive information also known as <u>special category data</u>, such as health data, ethnicity or religious beliefs - but only where it is needed to provide a service, fulfil a legal obligation and/ or for monitoring equality of both for customers and employees. We will always explain to you why and how this information will be used. We will always demonstrate to you what our lawful basis is for processing this type of information and where appropriate seek your consent.

As described above we collect and process information about you, so that we can carry out our public task functions as a landlord and to deliver public services. This includes but is not limited to:

- administering the assessment and collection of rents and other revenue including benefits.
- the provision and administration of all commercial services
- the provision of all non-commercial activities including refuse collections from residential properties.
- local and national fraud initiatives
- to prevent and detect fraud or crime and prosecution offenders including the use of CCTV

- managing our property
- maintaining our own accounts and records
- supporting and managing our employees
- promoting the services we provide
- carrying out surveys
- undertaking research
- internal financial support
- corporate administration and all activities we are required to carry out as a data controller and public authority

We collect and process the following categories of personal information:

- personal and family details
- lifestyle and social circumstances
- goods and services
- financial details
- employment and education details
- housing needs
- visual images, personal appearance and behaviour

We may also collect and process special categories of personal information that may include:

- racial or ethnic origin
- religious or philosophical beliefs
- data concerning a person's or sexual orientation

# Ladybur's commitments under the GDPR and UK Data Protection Act 2018

The Co-operative's commitment will be to ensure that the data is:

- processed lawfully, fairly and in a transparent manner
- collected for a specific and legitimate purpose it will not be used for anything other than this stated purpose
- relevant and limited to whatever the requirements are for which they are processed
- accurate, and where necessary, kept up to date. Any identified inaccuracies will be amended or removed without undue delay
- stored for as long as required, as specified on our records retention policy
- secured with appropriate solutions, which protect the data against unauthorised or unlawful processing and against accidental loss, destruction or damage

Ladybur will demonstrate its compliance with these principles.

### Ladybur's commitment to processing personal data lawfully

The Co-operative will ensure that it meets the conditions necessary for processing personal data lawfully and will ensure this is adequately recorded. There are several ways that processing can be lawful. Consent is one method, but it is important to know that consent is not always required and the Co-operative can lawfully process personal data as long as a condition is met. For example, the Co-operative would be unlikely to collect rent arrears if residents could withdraw their consent for processing their data for this. You can find out more about the conditions on the <u>ICO website</u>, (https://ico.org.uk).

#### How we may share your information

We will sometimes need to share information between council departments services and elected Members, as well as other organisations such as our partners, third party contractors, government bodies, the police, health and social care organisations, housing associations, landlords and educational establishments.

We will only share information where it is appropriate and legal to do so. We may also share information, for example, if there is a risk of serious harm or threat to life, for the prevention and detection of fraud or crime, assessment of any benefit or duty or if we are required to do so by any court or law. Where this is necessary, we are required to comply with all aspects of the data protection laws.

#### How long we keep your information

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

We may also anonymise some personal data you provide to us to ensure that you cannot be identified and use this data to allow Ladybur to effectively target and plan the provision of services.

## Your rights and access to your information

You have the right to request a copy of the information that we hold about you.

The new UK Data Protection Act 2018 also gives you additional rights that refer to how Ladybur holds and uses your information.

Consequently, under certain circumstances, by law you have the right to:

- withdraw consent and the right to object and restrict further processing of your data; however, where legally enforceable this may affect service delivery to you.
- request to have your data deleted where there is no compelling reason for its continued processing and provided that there are no legitimate grounds for retaining it.
- request your data to be rectified if it is inaccurate or incomplete
- have your data transferred or copied should you move to another authority
- not be subject to automated decision-making including profiling

#### **Contacting Ladybur Housing**

There are various ways in which the Co-operative may be contacted: by letter, face to face, email, telephone, online forms, etc. In all cases the Co-operative is committed to protecting the personal data you provide.

#### **Use of IP addresses and cookies**

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

We use cookies to audit the use of our website and help us to customise the website for your visit. We do not store or transmit any personally identifiable data on these cookies. You can change your cookie setting at any time in the security settings in the browser you use to access the internet. Please note however, that rejecting all cookies may impact your enjoyment or use of this website.

We collect IP addresses (a unique string of numbers that identifies each computer) only for the purposes of system administration and to audit the use of our site. We do not link IP addresses to anything personally identifiable, which means that while your user session will be logged you will remain anonymous to us.

#### **Changes in your personal circumstances**

You must notify us immediately if there are any changes in your circumstances and personal details so we can maintain an accurate and up to date record of your information.

#### If you have any concerns

You have a right to complain to us if you think we have not complied with our obligation for handling your personal information.

#### **Complaints**

If you are not satisfied with our response, you have a right to complain to the Information Commissioner's Office (ICO). You can report a concern by visiting the <u>ICO website</u>.

#### **Changes to our Fair Processing Notice**

As the Co-operative creates new services, this may generate need to amend the Notice. Any changes regarding how we process personal data will be posted on this page.