



Catalyst Housing Ltd

Privacy statement for applicants, tenants, leaseholders, and customers

May 2018

Key points:

- **Why do we use your data?** We use your personal information to determine your application relating to a tenancy/lease and/or to provide services to you under the agreement we have entered into, or are proposing to enter into, with you, and/or to provide support services at your request.
- **We use your sensitive data:** During your tenancy we may collect and use information about your health, religion, racial and ethnic origin, sexual orientation or criminal convictions and offences.
- **Sharing data:** We may share your data with third parties, including third-party service providers, subsidiaries and other entities in the group.
- **Security:** We respect the security of your data and treat it in accordance with the law.
- **International transfer:** We shall not transfer your personal data outside of the European Economic Area.

1 Purpose of our privacy notice

- 1.1 Under the data protection legislation, we are required to explain to you why we are asking for information about you, how we intend to use the information you provide and whether we will share this with anyone else.
- 1.2 This statement applies to all applicants, tenants, leaseholders and customers.
- 1.3 We may update this statement at any time.
- 1.4 It is important that you read this statement so that you know how and why we use information about you. It is also important that you inform us of any changes to your personal information during your application process so that the information which we hold is accurate and current.

2 Who are we?

- 2.1 We are Catalyst Housing Ltd (**Catalyst**), one of the UK's leading housing associations and a member of the G15 group, with over 21,000 homes in London and the South East. We're here to make a purposeful difference, providing housing solutions and opportunities for those who can't afford a home without our help. We employ over 600 people based in locations across London and the South East.
- 2.2 Our registered office is Catalyst Housing, Ealing Gateway, 26–30 Uxbridge Road, London W5 2AU.
- 2.3 Catalyst is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you.



3 Our Data Protection Officer

- 3.1 Our Data Protection Officer is responsible for overseeing what we do with your information and monitoring our compliance with data protection laws.
- 3.2 If you have any concerns or questions about our use of your personal data, you can contact our Data Protection Officer by writing to The Data Protection Officer, Catalyst Housing, Ealing Gateway, 26–30 Uxbridge Road, London W5 2AU or by emailing: data.protection@chg.org.uk

4 Why are we collecting your information?

- 4.1 The information that you provide to us will be used:
- 4.1.1 to determine your application relating to a tenancy/lease; and/or
 - 4.1.2 to provide services to you under the agreement we have entered into, or are proposing to enter into, with you; and/or
 - 4.1.3 to provide support services at your request.
- 4.2 Without this information, we may not be able to enter into an agreement with you or provide the services you want.

5 Types of personal information we use

- 5.1 We are collecting information about you which is relevant to the above uses. This includes the following information:
- 5.1.1 **personal details** (such as name, date of birth, gender and marital status);
 - 5.1.2 **contact details** (such as your address, personal telephone number and personal email address);
 - 5.1.3 **confirmation of your identity** (such as photographs and a copy of your driving licence);
 - 5.1.4 **grievance and complaints information** (such as reports about anti-social behaviour and complaints made by or against neighbours);
 - 5.1.5 **information about your family and others** (such as dependants, other people living with you, next of kin and emergency contact numbers);
 - 5.1.6 **financial and transaction information** (such as bank details, payments made to us and any money owed to us);
 - 5.1.7 **Recordings of telephone conversations** made to our contact centre;
 - 5.1.8 **security information** (such as CCTV footage); and
 - 5.1.9 **information you provide to us when accessing our optional support services**, including employment support, energy saving programmes and financial inclusion (such as your employment status, salary and financial situation).



Special categories of personal data

5.2 Some of the information which we collect may be special categories of personal data (also called sensitive personal data). Special categories of personal data require a higher level of protection. The special categories of personal data about you which we may collect include:

- 5.2.1 information about your **race or ethnicity, religion and sexual orientation**;
- 5.2.2 information about your **health**, including any medical condition or disability; and
- 5.2.3 information about **criminal convictions and offences**.

6 Source of your personal information

6.1 The above information which we collect about you will be obtained through a variety of sources which include:

- 6.1.1 from you directly as part of an application process, on enquiry forms, communications with you, information provided when entering into an agreement or for any other related reason; and
- 6.1.2 from third parties (such as your relatives, officers in the local authority/ social services department, as well as where we carry out identity verification credit or anti-fraud checks against your name using third party databases).

7 How and why we use your personal data

7.1 We use the types of personal data listed above for a number of purposes, each of which has a "lawful basis". In accordance with the data protection laws, we need a "lawful basis" for collecting and using information about you. There are a variety of different lawful bases for using personal data which are set out in the data protection laws.

7.2 We have set out below the different purposes for which we collect and use your personal data, along with the lawful bases we rely on to do so.

Performing our contract with you

- 7.2.1 To **assess your eligibility** for the tenancy/lease (or other agreement) you have applied for/requested.
- 7.2.2 To **enter into an agreement with you**, such as a tenancy, lease or other agreement.
- 7.2.3 To **provide services under our agreement** with you, such as property repairs and maintenance.
- 7.2.4 To ensure that the **support and services** provided to you are adequate and tailored to your needs.
- 7.2.5 To **communicate with you** in the most appropriate way (for example, by providing documents in large print or an alternative language).



7.2.6 To **adequately deal with your requests, appropriately manage any services we provide to you and handle any complaints** you make.

7.2.7 To comply with our **legal obligations** such as in the prevention, detection and investigation of fraud and corruption.

7.3 The lawful basis on which we rely in order to use the information which we collect about you for the purposes set out above is that using your information in this way is necessary for us to perform the contract between us and you and in order to take steps at your request prior to entering into the contract.

7.4 In limited circumstances, when carrying out the above purposes we may also rely on the following lawful bases:

7.4.1 you have provided consent to our use of your information;

7.4.2 using your information is necessary for us to comply with legal and regulatory obligations to which we are subject; or

7.4.3 using your information pursuant to our legitimate commercial interests (and your interests and fundamental rights do not override those interests).

Other reasons we may use your data

7.5 Although we will mostly use your personal information to perform our services under our contract, there may be other circumstances where we use your personal data which is not strictly necessary to perform the contract we have with you. These include:

7.5.1 **training and monitoring purposes** (such as through the recordings of telephone calls with our call centre handlers), based on our legitimate commercial interests; and

7.5.2 to provide you with **advice and/or support** where you have accessed our optional support services, with your consent.

8 How and why we use your special categories of personal data

8.1 Some of the information which we collect will be special categories of personal data (also called sensitive personal data), such as information about your ethnic background or your health.

8.2 We will use your particularly sensitive personal information in the following ways and based on the following lawful bases:

8.2.1 to consider whether we need to provide appropriate disability adjustments to a property, in order to comply with our legal obligations;

8.2.2 to provide you with documents in an alternative format, such as large print, because of a disability, at your request and with your consent; and

8.2.3 to comply with our legal obligations (such as those set out in the Equality Act 2010).



9 How we use information about criminal convictions and offences

- 9.1 We will collect and use information about criminal convictions and offences for the purposes of managing anti-social behaviour, monitoring fraud and to protect the health and safety of employees or customers. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our data protection policy.

10 What may happen if you do not provide your personal information?

- 10.1 If you refuse to provide certain information when requested, we may not be able to enter into an agreement with you, or we may be prevented from complying with our legal obligations (such as the requirement to ensure the safety of our tenants).

11 Complying with data protection law

- 11.1 We will comply with data protection law. At the heart of data protection laws are the "data protection principles" which say that the personal information we hold about you must be:

- 11.1.1 used lawfully, fairly and in a transparent way;
- 11.1.2 collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- 11.1.3 relevant to the purposes we have told you about and limited only to those purposes;
- 11.1.4 accurate and kept up to date;
- 11.1.5 kept only as long as necessary for the purposes we have told you about; and
- 11.1.6 kept securely.

12 Sharing your information

- 12.1 We will share your personal information with third parties where required by law, where it is necessary to administer the contractual relationship with you or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

- 12.2 "Third parties" includes third-party service providers (including contractors and designated agents), subsidiaries and other entities within our group. The following activities are carried out by third-party service providers:

- 12.2.1 utility companies so they can provide services to you and contact you in respect of utility charges;
- 12.2.2 repairs and maintenance contractors;
- 12.2.3 IT service providers.



When might you share my personal information with subsidiaries and other entities in the group?

- 12.3 We will share your personal information with subsidiaries and other entities in our group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise or for system maintenance support and hosting of data.

How secure is my information with third-party service providers, subsidiaries and other entities in our group?

- 12.4 All our third-party service providers, subsidiaries and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

What about other third parties?

- 12.5 We may share your personal information with other third parties, for example in the context of the possible sale or transfer of services. We may also need to share your personal information:
- 12.5.1 with a regulator,
 - 12.5.2 with the police and other law enforcement agencies for the purpose of detection and prevention of crime,
 - 12.5.3 with safeguarding authorities,
 - 12.5.4 with organisations with a function of auditing and / or administering public funds for the purpose of detection and prevention of fraud, or
 - 12.5.5 to otherwise comply with the law.

13 Transferring your information abroad

- 13.1 We will not transfer the information you provide to us outside of the European Economic Area.

14 Security of your information

- 14.1 We have put in place measures to protect the security of your information. Details of these measures are available upon request.
- 14.2 Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.
- 14.3 We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.



15 Can we use your information for any other purpose?

- 15.1 We typically will only use your personal information for the purposes for which we collect it. It is possible that we will use your information for other purposes as long as those other purposes are compatible with those set out in this policy. If we intend to do so, we will provide you with information relating to that other purpose before using it for the new purpose.
- 15.2 We may use your personal information without your knowledge or consent where such use is required or permitted by law.

16 Storing your information and deleting it

- 16.1 We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for.
- 16.2 To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
- 16.3 If your application for a tenancy/lease is unsuccessful we will retain your personal information for a period of 6 months, after we have communicated to you our decision.
- 16.4 If your application for a tenancy/lease is successful, we shall retain your personal data in line with our data retention schedule, which you can request from us by contacting our Data Protection Officer by writing to The Data Protection Officer, Catalyst Housing, Ealing Gateway, 26–30 Uxbridge Road, London W5 2AU or emailing data.protection@chg.org.uk.

17 Your rights

- 17.1 Under certain circumstances, by law you have the right to:
- 17.1.1 **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- 17.1.2 **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- 17.1.3 **Request erasure** of your personal information in certain circumstances. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- 17.1.4 **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) or public interest as our lawful basis for processing and there is something about your particular situation which leads you to object to processing on this ground. You also have the right to object if we are processing your personal information for direct marketing purposes.



17.1.5 **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

17.1.6 **Request the transfer** of your personal information to another party in certain circumstances.

17.2 If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact our Data Protection Officer by writing to The Data Protection Officer, Catalyst Housing, Ealing Gateway, 26–30 Uxbridge Road, London W5 2AU or emailing data.protection@chg.org.uk.

18 Right to withdraw consent

18.1 In the circumstances where we are relying on your consent as our lawful basis to process your data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.

18.2 To withdraw your consent, please contact our Data Protection Officer by writing to The Data Protection Officer, Catalyst Housing, Ealing Gateway, 26–30 Uxbridge Road, London W5 2AU or emailing data.protection@chg.org.uk. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

19 Automated decision making

19.1 You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

20 Right to complain to the ICO

20.1 You also have the right to complain to the Information Commissioner's Office (the "ICO") if you are not satisfied with the way we use your information. You can contact the ICO by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

21 Changes to this privacy statement

21.1 We reserve the right to update this privacy statement at any time, and we will provide you with a new privacy statement when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.