Customer Privacy Notice
February 2025

Purpose of this Privacy Notice
This Privacy Notice if for Hundred Houses Society (HHS) customers, which includes applicants wishing to live in our homes, tenants, leaseholders and shared owners and members of their households. It tells you what to expect when HHS collects and stores your personal and sensitive information. It tells you the purpose for which we will process your personal information and the legal basis for the processing ('processing' includes us keeping your personal information).

It is important that you read this Privacy Notice together with any other privacy or data processing information we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data. This Privacy Notice supplements other notices and our Data Protection Policy and is not intended to override them.

Who We Are
Hundred Houses Society Limited is a registered Society under the Co-operative and Community Benefit Societies Act 2014. We are registered with the Financial Conduct Authority and regulated by the Regulator of Social Housing. Our offices are located at 51 Scotland Road, in Cambridge. We are the Data Controller of personal information for the purposes of the UK General Data Protection Regulation (UK-GDPR) and Data Protection Act 2018.

Our Data Protection Officer (DPO), Magda Syposz, can be contacted at HHS, 51 Scotland Road, Cambridge, CB4 1QW, tel. 01223 856 347 or via email on magda.syposz@hhs.org.uk

Under UK-GDPR, HHS has a legal duty to protect any personal information we collect from you or about you from other sources. The UK-GDPR has a set of rules that we must follow when handling your information. These are referred to as Data Protection Principles.

In addition to our internal, computer and records systems, the Housing Management System which we use to hold customer information (Cx) is hosted by our service provider CIVICA, who are defined as Data Processors under the UK-GDPR. Your data is protected under our contractual agreement and CIVICA's own security of their systems. They will hold your data under our contract terms and only process your data in accordance with our instructions and agreements. The Data Protection Officer at CIVICA can be contacted directly or through HHS.

What information we collect about you
HHS collects and processes your personal data in accordance with UK General Data Protection Regulation and the 2018 Data Protection Act.

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 (anonymised data).

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

- **Identity Data** includes first name, maiden name, last name, marital status, title, identity documents, nationality and the following special category data: age (date of birth), disability,

gender, gender identity/reassignment, marital status, medical information, race or ethnic group, religion, sexual orientation

- **Contact Data** includes postal address, email address and telephone numbers
- **Financial Data** includes bank account, payment card and affordability details
- **Transaction Data** includes details about payments to and from customers (including housing applicants)
- **Usage Data** includes information about how customers use our website and services, including customer feedback
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences
- **Photographic Data** includes your likeness in photographs and CCTV footage where CCTV is in operation in communal housing areas and the Society's office.

We may collect, use, store and transfer the following special category data:

- Age
- Ethnicity
- Disability
- Gender
- Gender identity/reassignment
- Marital status
- Medical information
- Race or ethnic group
- Religion
- Sexual orientation
- Criminal records and history

How is Your Personal Data Collected?

Direct Interactions. We collect most of our information directly from you, including when you apply for one of our properties or services, complete one of our forms, email or meet with us, or respond to a survey.

For example, as part of the application and registration processes and provision of housing management services, we may collect the following information which contains personal data:

- **Customer related records -** electronic and paper records, files and documents - for example tenancy agreements, standing order instructions, direct debit mandates, feedback questionnaires, correspondence
- **Customer information -** evidence of identity, name, address, date of birth, gender, email address, telephone/mobile number, private and confidential information; sensitive information or certain types of medical information
- **Property and repair records -** requests for repairs, repairs details for contractors, work schedules, contractor reports
- **Rent account –** payments, bank account details, welfare benefits information
- **Customer feedback and satisfaction and other surveys** – correspondence, feedback, questionnaires, surveys and responses
- **Complaints and compliments** - communication, correspondence and replies.

Census data is collected separately when you complete the census; this is voluntary and it includes special category data. The information we collect through the census includes age (date of birth), disability, gender, gender identity/reassignment, marital status, medical information, race or ethnic group, religion, sexual orientation. This is information for all the

members of the household. Our customer census is conducted by a third party on behalf of HHS and we inform you of what to expect through one of our communications.

Third Parties. We collect data about you from third parties including Home-Link, the choice based lettings service run by Cambridge City Council. We may also receive information about you from other agencies, such as local councils or safety community partnerships, which are multi-agency relationships or measures designed to protect an individual's health, safety, and welfare, for example, from domestic or drug abuse. Information from third parties may include GPs, social workers, members of your family, courts, police, social services, mental health teams, neighbours, members of the public, employers, the National Anti-Fraud Network and other agencies.

Why do we collect personal information?

Required Data

Certain data including Identity Data, Contact Data and Financial Data is required to make a decision on your application for housing or to administer your tenancy. Failure to provide this information may prevent HHS from considering your application for housing or making an offer of accommodation to you.

How We Use Your Personal Data (Our Lawful Basis)

Hundred Houses Society uses Customer information to:

- Assess your eligibility for housing, as part of this we undertake anti-fraud measures (lawful basis: contractual)
- Manage tenancies and lettings (lawful basis: contractual)
- Manage Shared Ownership including re-mortgaging and sales (lawful basis: contractual
- Collect rents (lawful basis: contractual)
- Carry out repairs and maintenance works (lawful basis: contractual) and ensure that homes meet the Decent Homes Standard (lawful basis: legal obligation)
- Provide housing management and customer services (lawful basis: contractual)
- Help protect and safeguard you and other tenants, including in an emergency (lawful basis: legal obligation, contractual obligation, vital interest)
- Manage complaints, instances of anti-social behaviour and safeguarding issues (lawful basis: contractual, legal obligation)
- Share your information with other agencies where we have your agreement or another legal basis. This includes, for example, social services for safeguarding concerns or debt recovery agencies for unpaid rent (lawful basis: legal obligation, contractual or consent).
- Meet our legal obligations as your landlord including conducting statutory safety checks such as yearly gas safety checks and ensuring your home meets the Decent Homes Standard (lawful basis: legal obligation)
- Facilitate tenancy transfers and provide and assist in mutual exchanges (lawful basis: contractual)
- Communicate with Customers, such as provide information about our performance and services through newsletters (lawful basis: legitimate interest)
- Make alterations and adjustments to properties to ensure they are suitable for Customers with medical or disability requirements (lawful basis: legal obligation)
- Consult with you about service improvements (lawful basis: legitimate interest)
- Process insurance claims and council enquiries (lawful basis: contractual)
- Conduct transactional surveys, research and analysis to monitor and improve our services, for example repairs and maintenance, complaints, lettings, anti-social behaviour issues, ensuring equitable outcomes and monitoring anonymised equality & diversity statistics, and training. This can include sharing anonymised data with partners for broader research and benchmarking (lawful basis: legitimate interest)
- Help prevent fraud (lawful basis: legal obligation)

In order to provide housing and deliver our services, we share necessary information about you with our contractors and partners, including repairs and maintenance contractors, development services providers, gas and other safety checks contractors and other service providers. This may include information about any reasonable adjustments which has to be shared for the service to be delivered and from which special category data, such as disabilities or medical information, could be inferred. For example, we may tell a contractor that sign language needs to be used with a customer or that an area needs to be wheelchair accessible; where possible we share the adjustments not the reason.

We may also use your data for reporting and analysis and to carry out surveys as part of our customer influence and impact reviews.

Our auditors have access to our information systems and records for the purposes of carrying out internal and external audits.

HHS complies with UK data protection legislation, adopts good practice and holds and uses personal data (having identified a lawful basis) to provide, develop and manage social housing, deliver repairs and maintenance works and provide customer services.

We will process your personal data in the following circumstances:

- Where we need to perform a contract we are about to enter into or have entered into with you in relation to the social housing or services we provide
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests
- Where we need to comply with a legal obligation such as provide information to the police or social services or fulfil our landlord obligations under a tenancy agreement
- Where we receive your consent to do so

When processing special category data, we will only do so in circumstances where, in addition the above:

- There is a substantial public interest in doing so, such as equality of opportunity and treatment, safeguarding or to meet regulatory requirements
- To carry out our aim as a not-for-profit community benefits society, to provide social housing to our customers, where appropriate safeguards are in place
- We have received your explicit consent to do so

HHS may use third parties to process information on its behalf. HHS will only share personal data with third parties where we have assurance that they comply with the principles and requirements of the UK-GDPR.

HHS does not hold any Personal Data outside of the United Kingdom or the European Union (EU) and in general will not authorise a third party to transfer any personal data outside of the European Union. Although the UK is no longer a member of the European Union, the EU general data protection regulations are as rigorous as the UK-GDPR; therefore, some data may be stored in the EU. There may be exceptions where our partners transfer personal data outside the EU, but this will only be agreed if the Data Protection Impact Assessment conducted by HHS provides assurance that there would be no increased risk. In exceptional circumstances, where a transfer of Personal Data outside of the UK or the EU is necessary, HHS will ensure that the transfer is made in full compliance with the UK-GDPR.

HHS does not carry out any automated decision making.

When We Need Your Consent

We will use and process your data in accordance with this privacy notice. If we would like to process your data for any other reason not set out in this Privacy Notice, we will first seek your consent.

When we ask you for consent, we will explain the purpose for the request to use or share your information. We will record your consent and only use it in relation to the specific purpose detailed. If required, we may ask for your consent for more than one purpose.

How Long Do We Keep Your Information?

HHS follows a Data Retention Schedule, which sets out the retention periods for each type of record that we collect in accordance with standard industry practice. It can be found on HHS Data Retention Schedule (based on NHF HHS Amended).xlsx

In general, we will hold your personal information for as long as you are a customer of Hundred Houses or are in receipt of our services or we require to deal with any outstanding business with you. Your personal information on your customer account will be held for a maximum period of six years from the time that you cease to be a customer or use our services except where we are required by regulation to keep the information for longer. This is to ensure that the relevant information is available for legal and business purposes.

Your Rights - How You Can Access Your Information

We provide access to customers who wish to review the personal information retained. In all cases we will treat requests to access information in accordance with applicable legal requirements.

Notwithstanding our lawful basis for processing data, you have the following rights in relation to the way we deal with your personal data that we have obtained with consent:

- The right of erasure or to be forgotten
- The right to rectification if information is inaccurate or out of date
- The right of data portability (to obtain and reuse your personal data)
- The right to object to the Data Controller's and Data Processor's handling of your personal data
- The right to withdraw your consent (where we may have sought it for specific reasons) with regards to the handling of your personal data
- The right to ask for a copy of the personal data we hold about you (Subject Access Request)
- The right to lodge a complaint with the supervisory authority – the Information Commissioner's Office (ICO)

Where you exercise your right to object or withdraw consent, we may process your personal data without your knowledge where we are permitted or required by law or regulatory requirements to do so. In such cases we will not process more personal data than is required.

If you are not satisfied by our actions, you can seek recourse through our internal Complaints procedures. If you remain dissatisfied, you have the right to refer the matter to the ICO or seek recourse through the courts.

The ICO can be contacted via:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow

Cheshire
SK9 5AF
Helpline number: 0303 123 1113
ICO website: https://www.ico.org.uk

Subject Access Requests (SARs)
If you would like a copy of the information we hold about you, you may request this in writing (by post or email) or verbally.

We will acknowledge your request upon receipt and provide the information as soon as we are able to, and within a month of receipt of your request. There are some exceptions to this timeframe, where we are specifically permitted by the ICO to extend the timeframe for provision of information up to 90 days, but we will inform you within the initial 30 days if that is the case.

This is a free service. We may refuse or there may be an administrative fee for a request if it is unfounded or excessive.

Information Security
We have in place reasonable standards of technological and operational security along with internal policies and procedures which detail the security arrangements over data, information, and systems.

We take reasonable steps to ensure all information is stored safely, used properly, and protected from loss, misuse, alteration, or destruction.

Equality and Diversity Commitment
This document forms part of HHS's commitment to create a positive culture of respect for all customers. The intention is to identify, remove discriminatory practice in relation to the protected characteristics (ethnicity, disability, gender, sexuality, age, religion or beliefs, marriage or civil partnership, and pregnancy), as well as to promote positive practice and value the diversity of all individuals and communities.

Changes to our Privacy Notice
We reserve the right to modify or amend this privacy statement at any time and for any reason, providing it maintains compliance with UK-General Data Protection Regulation.

For any queries regarding this Privacy Notice or data protection at Hundred Houses Society, please contact our Data Protection Officer, Magda Syposz, on magda.syposz@hhs.org.uk, tel. 01223 856 347, or by post at Hundred Houses Society, 51 Scotland Road, Cambridge CB4 1QW.

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