

## Privacy Notice

### Why do we need your information?

To ensure the most equitable delivery of our service we need to understand our customers, what you want and need and how we can make improvements.

One way that will allow us to do this is by gathering data about you through a comprehensive questionnaire which will allow us to update information we already hold as well as add further information to your customer record.

The information you provide will enable us to:

- Communicate with you via your preferred language and communication channel.
- Identify customers who may require additional support and priorities for more regular welfare checks and home visits.
- Offer services which are appropriate to the population of that area and cater for your needs.
- Tailor our policies so they are fair, equitable and representative of our customer population.

### Lawful Basis

We need a lawful basis to use your information. The information you provide to us through the questionnaire and thereafter will be used under one of the following conditions:

- **Necessary to take steps or for the performance of a contract (Article 6 (1) (b))** – To manage your tenancy.
- **Legitimate Interest (Article 6(1) (f))** – to manage our relationship with you and to help us improve our services to you.
- **Processing is necessary for the performance of a task carried out in the public interest (Article 6 (1) (e))** – To comply with the Equality Act 2010.

Some of the information you provide will be special category information to ensure there are no risks to you or your household. This includes:

- **Health information** – to ensure your home has any necessary adaptations so that you can live without further risks to your wellbeing in line with Article 9(2)(b) of the UKGDPR and Data Protection Act 2018, schedule 1 part 1 (1) and to monitor diversity and equality of treatment of customers in line with Data Protection Act 2018 schedule 1, part 2 (8) and Equality Act 2010.
- **Information on your protected characteristics** – to monitor diversity and equality of treatment of customers in line with Data Protection Act 2018 schedule 1, part 2 (8) and Equality Act 2010.

### Who will have access to my information?

Access to the 'about you' data will be limited to employees of The Guinness Partnership and third parties who need it for the specific purpose of managing your tenancy and improving our services to you.

Information that is being collected for equality purposes will only be accessed by approved individuals for the purpose of monitoring and keeping under review the equality of opportunity and treatment of individuals.

### Where is my information held?

Your information will be held on our:

- Customer Relationship Management (CRM) System and the information will be held in EEA/UK Data Centres.
- Housing Management System.

We take steps to make sure that, when we transfer your personal information to another country, appropriate protection is in place, in line with data-protection laws. Often, this protection is set out under a contract with the organisation who receives that information, and we will make sure they have good information security practices in place to protect your information.

### How will you keep my information safe?

We will process your data in line with the UK General Data Protection Regulation (UKGDPR) and Data Protection Act 2018. Your data will be handled sensitively and in confidence by our staff and partners.

### How will my information be kept accurate and up to date?

The information you give us must be correct at the point you provide the information to us. If anything changes, please let us know as soon as possible so we can update our records. We may ask you confirm your information is still up to date regularly so your records remain accurate and up to date.

### How long will my information be kept for?

The information you provide from the questionnaire will be held against your customer record. The information may be updated at any point through the management of your tenancy in order to keep the information we hold on you accurate and up to date.

Information will be retained for a period of 6 years once your tenancy has ended.

### Your rights

For further information on how we handle your data for different purposes, including your individual rights, please see our Privacy Portal on the website [www.guinnesspartnership.com/our-privacy-notice/](http://www.guinnesspartnership.com/our-privacy-notice/)