

Privacy Notice (General needs)

Here at WM Housing Group Ltd, we take your privacy seriously. Below, we detail what information we collect, why we collect it, who we share it with and how we safeguard it. We will only use your personal information to administer your tenancy; however, we will share it with appropriate third parties.

For some information, we do not need to seek your consent to hold or process it as it is part of our performance of a contract. We obtain your personal identifiable information in order to conduct our normal business operations as a Registered Social Housing Provider. We provide more than just a home and therefore we will also ask you to give us other information. How we use your personal information will depend on the services we provide to you.

This is explained in more detail below.

WM Housing Group Ltd will never sell your information to third parties. For the purpose of this privacy notice we are the data controller of your personal identifiable information as we determine the use of this information. As a Registered Social Housing Provider, we are regulated by the Regulator of Social Housing (RSH). WM Housing Group Ltd is a term used to include associations: West Mercia Homes Ltd, Whitefriars Housing Group Ltd and Family/Optima Housing Association.

What information we collect, why we collect it, the legal basis for doing so, and how long for:			
What	Why	Basis	Retention
Contact information <ul style="list-style-type: none"> • Name • Date of birth • Previous address • IP (Internal Protocol) address • Telephone numbers • Email address 	Your tenancy agreement is a contract between you, any other person in your household (should you hold a joint tenancy) and WM Housing Group. This data is used to set up and maintain your tenancy account with us.	B	Life of tenancy + 6 years after tenancy ends
<ul style="list-style-type: none"> • National insurance number • Financial information • Identification 	To assess your benefit entitlement and council tax. To assure ourselves you can sustain a tenancy and that you have the right to rent, as laid down by regulation.	F	NI number & identification – life of tenancy/ Financial information 6 months
Details of unspent convictions/ criminal offences attracting a custodial sentence/on a register/person of interest	We use unspent conviction information to house you appropriately.	F	Life of tenancy but regularly reviewed. If no issues when conviction spent data will be

			deleted after 1 year following suspension
<ul style="list-style-type: none"> • Details of any support needs you have • Details of those people providing additional support • Next of kin details/emergency contacts • Disability information 	As required by our regulator and to provide information on extra services we provide – such as tenancy support.	F	Life of tenancy but regularly reviewed
<ul style="list-style-type: none"> • Authority to Act or Power of attorney 	We use this information to ensure we deal with the most appropriate person dealing with your affairs	F	Life of tenancy but regularly reviewed
References from previous landlords	We use this information to provide you with support	F	Deleted after 1 year of tenancy being granted
Proof of right to rent		C	Life of tenancy
<ul style="list-style-type: none"> • Ethnicity • Religion • Sexuality 	For analysis purposes, as required by our regulator and to provide information on extra services we provide.	C C	Destroyed after data is recorded
Details of who is living with you	Used to ensure you are not overcrowded or under-occupying a property.	B	Life of tenancy but regularly reviewed

Types of Legal Basis

A – Consent	B – Contract	C – Legal obligation	D – Vital interests	E – Public task	F – Legitimate interest
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Where someone sharing a home with you is over 14 years of age, and where you provide next of kin information we require you to inform them that we hold their information. We have a contractual requirement to collect and process this information, as part of the provision of service to you.

Who do we share your data with?

It depends. Some data, such as your name, address, move-in date and national insurance number will be shared with local authorities to assess your benefit entitlement and council tax. Other information is shared with third parties such as sub-contractors, social services, police, fire service and other service providers. A full list can be found on our website, <https://www.wmhousing.co.uk/about/data-protection/>

How we **keep** your data safe?

All information you provide to us is kept within our secure housing management system. Any documentary evidence is scanned and kept within our secure document management system. Only WM Housing employees can access these systems, after undertaking training in data protection and information security.

How we **obtain** your data

We obtain personal identifiable information by various means; this can be face to face, by email, by telephone, correspondence or by receiving information from others for local elected members who are representing you, police, health or social care agencies, benefit agencies etc. We also receive information from other people who know you and/or are linked to you, for example relatives, persons nominated to act on your behalf or representing you legally.

Where we share information with third parties, we do so safely and via secure networks. This may be encrypted emails, or via secure portals into our network.

Your **rights**

Under the General Data Protection Regulations (GDPR), you have the right to be informed about how we use any data you provide: what data we collect, why, who has access to it, how long it's kept, and the legal basis we have for doing so. In certain circumstances we may need to request your consent to collect and use your data, but in those cases, you have the right to object and withdraw that consent just as easily as it is given. Should you not wish to provide your consent, any services directly related to this data cannot be provided.

You have the right to have your personal data removed where there is no legal basis for us to hold it, as well as the right to request your data is transferred to a third-party (data portability). Any automated decision making, based on your data, can be challenged and a human decision made. Additionally, you have a right of access and can request a copy of any personal data provided, and subsequently the right of rectification of any incorrect data identified. Visit the data protection page on our website to see more information about your rights. To exercise these rights and submit a Data Subject Access Request (DSAR), please contact the WM Group Data Protection Officer (Mrs K McDowall) at WM Housing Group, 4040, Solihull Parkway, Birmingham Business Park, Birmingham, B37 7YN. Overall responsibility for management of your data resides with the WM Group Data Controller (Mr S Kellas) at WM Housing Group, 4040, Solihull Parkway, Birmingham Business Park, Birmingham, B37 7YN or info@wmhousing.co.uk.

Complaints can be lodged with the supervising authority at The Information Commissioner's Office: <https://ico.org.uk/concerns> or 0303 123 1113.