

WM Housing Group

Privacy statement for our customers

Purpose of this Statement

This Privacy Statement applies to each of the following members of the WM Housing Group of companies:

- WM Housing Group Limited (registered number 28654R and registered address 4040 Lakeside, Solihull Parkway, Birmingham, B37 7YN)
- Family Housing Association (Birmingham) Limited (registered number 26763R and registered address 4040 Lakeside, Solihull Parkway, Birmingham, B37 7YN)
- Optima Community Association (registered number 03681553 and registered address St Thomas House, 80 Bell Barn Road, Birmingham B15 2AF)
- Whitefriars Housing Group Limited (registered number 30092R and registered address 4040 Lakeside, Solihull Parkway, Birmingham, B37 7YN)
- West Mercia Homes Limited (registered number 31930R and registered address 4040 Lakeside, Solihull Parkway, Birmingham, B37 7YN)
- West Mercia Development Ltd, (registered number 07561213 and registered office 4040 Lakeside, Solihull Parkway, Birmingham, B37 7YN)

We are committed to protecting and respecting your privacy. We think it is extremely important to keep any personal information we have about our customers secure and confidential.

Laws apply to our use of anyone's personal information and everyone has rights regarding how their personal information is handled.

We have published this statement to tell you:

- What information we collect about you
- How we store your personal information
- What we use your personal information for, and
- Who (if anyone) we pass it on to and how they use it.

Information we may collect from you

We may collect the following personal information about you:

When you first come to see us or make an enquiry via a third party (such as through the Choice Based Lettings Scheme)

- Your name, address and contact details for use across the Group and by our suppliers and partners
- Detailed personal information such as age, sex, date of birth, ethnicity, whether you have a disability and any other particular needs or preferences so that we can understand our customers and their needs better
- Your housing needs, so we can find a property that suits you when available from us or selected other landlords
- Details held about you by credit reference agencies (and we shall submit information that we have collected about you to those credit reference agencies to obtain such details)

For housing management purposes

- Your housing needs, so we can find a property that suits you when available from us or selected other landlords
- Bank details and direct debit information to make payments to us such as rent or service charges (we only exchange the details with the account holder). This data is kept secure and restricted to a few members of staff.
 - NB - if you pay us using your payment card we do not store the details, for added security (and we only exchange the details with the person we believe to be the card holder)
- Benefit and council tax information to verify your circumstances
- Details relating to the repair and maintenance of your home
- Information that you provide to our officers in conversations or correspondence
- Feedback from our contractors, about their appointments with you
- Voice and video recordings for safety, crime reduction and quality management

To enhance your experience with us

- You can give us details of your friends, relatives or neighbours who you trust to contact us on your behalf, e.g. to arrange one of our services for you
- Your name and contact details for Customer Satisfaction surveys, newsletters and service information
- With your consent, your name, photo, video or story for brochures, advertising or press releases or use by the media
- Any information about complaints about our service or other individuals, or accidents or incidents involving you or your home
- Your comments about services from us or our suppliers

If you ask for additional services from us

- If you ask us for care and support requirements we will hold detailed information about your needs and your families needs
- We will hold records of payments for the services

- If you contact us about money problems we will hold detailed information about your income and debts; we keep this separate from our other information about you

In addition

- We may hold information about your history, e.g. regarding credit, or offences, if we need it to look after our colleagues, business or anyone else
- If you make a complaint we will keep the details separate from our other information about you

We may get the information, or related information, from your or our partner organisations (see below), your family, friends or neighbours, our colleagues or public information sources including credit reference agencies or the Criminal Records Bureau.

We may also record factual information whenever you contact us or use our services, and of other action we take, so we have a record of what happened.

Where we store your personal information

We are committed to holding your personal information securely. This means only those of our colleagues and contractors that need to see it have access.

Our computer system is at our offices. Sometimes we also use computers which are owned or managed by our suppliers, if the computers are secure and under our control.

What we use your personal information for

- As above, and generally for providing our services for you
- Data sharing within the Group
- Keeping in touch with our customers, understanding your needs and preferences, inviting you to events, and offering and booking appointments with you
- Telling you about changes to the Group or any other member of the Group
- Meeting your housing management needs and requirements
- Managing payments from you to your or on your account, and for accounting purposes

- Providing additional services at your request including skills training and every day support services
- Prevention, detection and prosecution of crime, and quality management
- Informing our staff, contractors or others (as appropriate) about past incidents e.g. anti-social behaviour, for their protection, in line with our policies
- Meeting our legal obligations including our funders or regulators
- Us or your other suppliers exercising legal rights, including under contract with you
- Other purposes - we may anonymise your information so that it cannot be linked to you. In that case we may use the data for any purpose

Who else we may pass on your information to

Normally, only we will be able to access your personal information. However there may be times when we disclose your details to others, as follows:

- Organisations within the Group
- Our suppliers who enable us to provide our services to you, or who provide services on our behalf
 - Housing contractors e.g. to undertake repairs or improvements to your home
 - IT providers who own or manage the computers, phones or systems we use
 - Our contractor who handles your out of hours service calls for us
 - Banks e.g. to carry out payments through a secure system
 - Companies that assist us in mailing out our leaflets/ newsletters
 - Additional staff resources, such as consultants or agency staff
 - Our professional advisors and providers of financial services
- Our partner organisations whose purposes dovetail with ours
 - Training providers or learning institutions
 - Other housing associations
 - External assistance where you have agreed to the referral, for example to do with money problems

- Local authorities and Government departments who provide relevant services for you, including benefits (including for the purposes of detecting and preventing fraud)
- The Police, fire services, health authorities or medical staff who provide services for you
- Others who may request information from us for their own purposes
 - Utility companies
 - Debt collection agencies acting for others
 - For crime prevention or detection, risk assessment, resolution of complaints or other issues
 - Local authorities, Safeguarding Boards, regulators, Government departments and other public authorities, such as for preventing payment errors or fraud
 - The Police, fire service, health authorities or medical practitioners

We may sometimes be obliged to disclose your personal data by law such as by a regulator with appropriate power, or court order.

We do not give anyone else access to your information, in return for payment, for their marketing or commercial purposes, unless you give specific consent.

Unless you pay our bills using direct debit we will not usually retain your payment details. Whoever pays your bills will have to give us the payment card details each time they make a payment.

We will not share your personal information with anyone who claims to represent you unless we are satisfied that you have appointed them or they act in some recognised official capacity. There may be a delay to us dealing with requests whilst we confirm the caller's identity, or check that we have your approval to deal with them.

Social media

We may get your information from social media, whether on our own sites or elsewhere. Where you use our own website or social media you grant us an irrevocable, royalty-free, non-exclusive licence, and give us your consent, to copy, use and reproduce any of your contributions for any purpose.

Where you make a contribution to **any** social media (whether on our own site or elsewhere) we may use that information for any of the purposes stated in this privacy statement.

Where a contribution to **any** social media (whether on our own site or elsewhere) constitutes a breach of our policy, we may take the following actions:

- Issue of a warning to you.
- Start legal proceedings against you for reimbursement of all costs on an indemnity basis (including, but not limited to, reasonable administrative and legal costs) resulting from the breach.
- Take further legal action against you (including, but not limited to, proceedings for a breach of your contract of employment or other contract you may have with us).
- Report you and disclose such information to law enforcement authorities in any jurisdiction as we reasonably feel is necessary.
- Report you and disclose such information to any local government or statutory body in the United Kingdom as we reasonably feel is necessary.
- Report you and disclose such information as we reasonably feel is necessary to the site administrator and/or take action against you through the site administrator's procedures to enforce the policies and terms and conditions that apply between you and the site administrator and/or between you and us.
- Publish such information about you as we reasonably feel is appropriate, publicly (which may include social media).

We exclude liability for actions taken in response to breaches of our policy. The responses described in this privacy statement are not limited, and we may take any other action we reasonably deem appropriate and we are not obliged to take any action.

Where you make a contribution to our social media, we may also take the following actions in addition to any other actions described above:

- Immediate, temporary or permanent withdrawal of your right to use our social media.
- Immediate, temporary or permanent removal or editing of any posting or material uploaded by you to our social media.

Your rights

You have the right to ask us not to process your personal information; however we may be unable to provide our service to you if we are unable to record and process certain details.

Accessing the information we have about you

You have a legal right to access information that we hold about you. You can fill in the form or write to our Data Protection Officer at our registered office address.

We will respond to your request within one calendar month and in most cases we will be able to comply with your request. However we may not be able to provide you with your request if your personal information contains details about another person.

Changes to our Privacy Statement

This Statement may change. We will display the new Statement in all places where it can usually be found, such as on our website, and at our offices.