

# Privacy Notice

This notice explains how we use your data and how we protect your privacy. As our services develop we will continue to update and review this statement to comply with both the law and customer feedback.

## Data Controller and Purpose

Tower Hamlets Homes (THH) is a registered data controller under the Information Commissioners Office (ICO), our registration number is Z1261726. We collect and process personal information about our residents to provide social housing and services related to housing. We process your data in accordance with the General Data Protection Regulation (GDPR) and UK privacy legislation. If you have any concerns you can contact THH's Data Protection Officer on [data@thh.org.uk](mailto:data@thh.org.uk)

## What is personal data?

Personal data is data related to a living individual who can be identified from that data. Sensitive personal data is data which includes more specific information about the individual such as ethnicity or sexual orientation.

## What information we collect about you

The information we require from you, as tenant(s) or leaseholder(s), includes:

- Full name (and proof of your identity / photo ID).
- Date of birth.
- National Insurance number (your unique identifier).
- Contact details (phone, e-mail or correspondence address).
- Details of anyone authorised to act on your behalf if applicable.
- Basic details (name and DOB) of all household residents.
- Banking details if you pay your rent by Direct Debit.
- Card details if you pay by card (however card details are not stored).
- Proof of housing eligibility, any interest or equity in other property.
- Other personal information that will vary on a case by case basis to help us resolve breach of tenancy, alleged anti-social behaviour, fraud or to process applications for parking, estate facilities or Right to Buy applications.

The information we may collect from you includes:

- Disabilities or vulnerabilities. We use this information to tailor our service to better meet your particular circumstances and needs. We may use this information for safeguarding of staff.
- Financial information. We may use this to help resolve arrears payments and optionally to provide welfare, benefits and debt advice

as a free service to help you budget and pay your bills. We may use this to apply for funding on your behalf or make a referral to an appropriate support organisation with your consent.

- Health information when we require this to support applications for adaptations made to the property you are living in. More specific details will be provided if you use this service.
- Photo ID, bank statements, payslips or income details when we require this information for processing a house sale or purchase.

If you do not provide the information we need then we may not be able to provide all our services to you, and ultimately you may not be able to hold a tenancy or lease, or purchase a property.

## **How we collect your information**

THH collects information from you through a variety of sources including when you sign a tenancy agreement or purchase a lease, complete one of our forms, or when you call, write, email or meet us, respond to a survey or register for MyTHH, our self-service portal. We may also collect information when you use our social media sites or websites.

We record some telephone calls to support staff training and for monitoring purposes. Our call recordings are usually held for a period of 12 months unless we need to keep a copy for a specific purpose; once the recording is no longer needed we will delete any and all copies made. Email correspondence may be kept as a record of contact.

CCTV is installed on some of our estates, they are fitted to monitor building security and for crime prevention and detection. The main estate based CCTV is operated by Tower Hamlets Council for us and the images are stored by them. From time to time we may operate CCTV/sound recording and/or use photography to capture evidence of breach of tenancy, alleged anti-social behaviour or crime. We will not hold images for longer than necessary and will dispose of them securely.

We also hold information about our employees, including prospective, current and former employees. If you are applying for a job with THH you should read the Recruitment Privacy Notice on our recruitment portal.

## **How we use this information**

We collect and process your information so we can deliver effective housing services, statutory and otherwise. We do not want to be intrusive and will only collect the necessary information needed to effectively and efficiently run our services. The information you provide will not be seen by, accessed by or disclosed to anyone who shouldn't see it. Unless specifically advised otherwise, we will only collect and process your information in order to carry out these functions:

- Managing your tenancy or lease and the London Borough of Tower Hamlets or Tower Hamlets Homes property it relates to
- Property and estates maintenance and repair
- Managing parking and other facilities on our estates
- Adaptations to the properties we manage
- Selling properties through the Right to Buy
- Delivering support to you or any member of your household within an agreed support plan
- Collecting information in order to monitor our performance
- Administering community grants
- Providing associated welfare benefits and debt advice, services and support
- Maintaining our accounts and records
- Recruiting, supporting and managing our board, employees, agents and contractors
- Promoting the services we provide
- Carrying out surveys and conducting research
- Local fraud initiatives
- Organising and assisting community events
- Offering opportunities to be involved
- Corporate administration and all activities we are required to carry out as a data controller
- Ensuring we meet our legal obligations

We use automated processes to calculate the rents, service charges and major works bills for the properties we manage, and to initiate contact with tenants and leaseholders who have fallen into arrears on their rent or service charge accounts. We also use information about our residents and properties to inform strategic decision making through the preparation of block, estate or neighbourhood profiles.

## **How we use information about children**

THH does not normally process children's information as part of a tenancy or lease, as all tenants or leaseholders are adults. However, we record children's basic information if they are resident in one of our properties, including their name and date of birth. This is required to check the property is not overcrowded and to assess other tenancy management issues where all householders and ages are required to be known. We may receive children's information if we are involved in the housing and tenancy aspects of a welfare case as part of a multi-agency working solution.

## **How we communicate with you**

THH needs to communicate with our customers and this will usually be in writing or by telephone, although we are increasingly using electronic and paperless means to do so. We are planning to move more of our services online as this is usually more convenient for you and more efficient for us. Our secure online service is called MyTHH.

If you use the MyTHH service it is important that you keep your password secure and do not share your account details with any other person. The privacy of your information, as with any on-line service, depends on you keeping your login credentials to yourself, as well as setting a suitably complex password. MyTHH accounts are unique to each person so where there are joint tenants or leaseholders each party may have their own MyTHH account.

We deliver a copy of our regular newsletter, Open Door, to every property we manage in order to keep residents informed about our services and aware of opportunities for involvement. We also offer residents the opportunity to receive other communications electronically should you so choose; you may also withdraw your consent to receive these additional electronic communications at any time.

We will only discuss or communicate your tenancy or lease details with those named on the agreement or those authorised (temporarily or permanently) by you. You can authorise someone temporarily verbally over the phone or permanently in writing.

## **Who we share data with**

From time to time we may need to provide or obtain personal information relating to you or members of your household from third parties. However, this will only happen so we can achieve the purposes detailed above and deliver the best possible services to you.

THH shares limited personal information with our contractors who are carrying out services on our behalf. Our contractors are required to comply with the law and our own data protection contract clauses to ensure data is managed appropriately and for specified purposes; these include running our out-of-hours telephone service or to complete emergency, responsive or planned property repairs.

THH has a duty to protect public funds and may use personal information and data-matching techniques to detect and prevent fraud, and ensure public money is targeted and spent in the most appropriate and cost-effective way. Information may be shared internally and with Tower Hamlets Council, government departments, such as the Department for Work and Pensions, other local authorities and registered social landlords, utility companies, and the Police where we are legally allowed to do so.

We may need to share information with solicitors, agents, court agents, surveyors and valuers in relation to a property sale. We try to deal with instances of rent or service charge arrears without the involvement of third parties however, in some cases of unresolved arrears and cases where arrears remain outstanding after the termination of a tenancy agreement we may disclose personal details to tracing and/or debt collection agencies.

## **How we store information**

We take our responsibilities under the GDPR very seriously and will adopt and maintain high standards in respect of handling personal information. Your personal information will only be collected if it is necessary and proportionate to do so. We have a number of policies and procedures in place to ensure your data is kept secure and safe. Methods such as encryption, access controls and staff security training are all designed to ensure that your data are only made available to those who have a right to see them.

The law prohibits organisations from processing data outside the European Economic Area (EEA) and THH abides by this.

We will only hold your information for as long as is required by law to provide you with the necessary services. We follow the local government recommend guidelines around retention periods. For example, information relating to a tenancy agreement will be kept for as long as the agreement is active or where money is owed on the account, and for a period not exceeding six years afterwards. We have been reviewing our Retention and Disposal Schedule and the functionality of our IT systems and will be implementing full disposal regimes as part of our regular system upgrades.

## **Your rights**

We aim to make our information easily accessible. For more information about our organisation check [our publication scheme](#) on our website.

Under the GDPR you have a number of rights over your personal data. You can learn more about these rights on our website – [www.thh.org.uk](http://www.thh.org.uk)

For further information, or to make a request to exercise any of your data subject rights you can contact us at the following:

Data Protection Officer  
Tower Hamlets Homes  
City Reach  
5 Greenwich View Place  
London  
E14 9NN

Email: [data@thh.org.uk](mailto:data@thh.org.uk)

If you wish to make a complaint about how we are processing your personal information you have the right to make a complaint at any time to the Information Commissioner's Office (ICO). You can find out how to contact the ICO on their [website](#).