



## Privacy Policy

### About us

Together Housing Association is responsible for collecting, processing, storing and safe keeping of personal information as part of our business activities. We manage information in accordance with relevant data protection laws.

### About this policy

We take your privacy and the security of your information seriously. We understand that when you give us your personal information you want to ensure that it is kept private and secure.

This policy sets out our approach to how we use and protect the personal information which you provide us when you apply for a job with us through this website.

### About the information we collect

We collect and process personal data about you, including but not limited to:-

- Name, address, date of birth and contact details
- Details of your education and training, qualifications and employment history
- References from previous employment
- Evidence of your right to work

We may also collect and process sensitive data such as:-

- Racial or ethnic origin
- Religious or similar beliefs
- Physical or mental health or condition
- Sexual orientation
- Details of criminal acts, proceedings and convictions (where this is required for specific job roles)

We will only collect information from you that we need to carry out our business activities and we will ensure that it is kept up to date and accurate.

### What we do with your information

If you are a tenant of one of our homes or applying to rent or buy one, we use your information to make decisions about your application, help manage your tenancy, provide you with services and advice, and respond to your enquiries. We may also use your information for administration, marketing, and research purposes and to ensure that our services are delivered fairly.

We will only use your data for one or more of the following reasons:-

- In order to meet our obligations under any contract we have with you e.g. a tenancy agreement or sales contract
- In order that we can meet any of our legal obligations e.g. complying with our landlord health and safety responsibilities.
- Where it is necessary in order to meet a legitimate interest on our or your behalf e.g. ensuring that our homes and estates are kept safe and managed effectively, providing you with information about our services, or to prevent fraud

If we ask you to provide any additional personal information e.g. over the phone, or by filling in a form, or through our website or mobile app's we will give you more details about why we need the information and what we intend to do with it.

Where we collect any sensitive data from you, we do this to ensure that we treat you fairly by complying with our responsibilities under equalities legislation and our own policies.

On occasion we may ask for your consent to use your data where we need it, but we will explain this to you and tell you how you can withdraw your consent and what effect it will have if you don't give us your consent.

We may apply markers to your information for example relating to any vulnerabilities or health status, to enable us to tailor how we deliver services to you.

## How we use your telephone number and e-mail address

Text messages, contact via telephone or via e-mail provides a direct way for us to contact you and share information about the services which we deliver to you.

We may use the telephone number or e-mail address that you have provided us to keep in contact with you.

## Text messaging, calls and automated calls

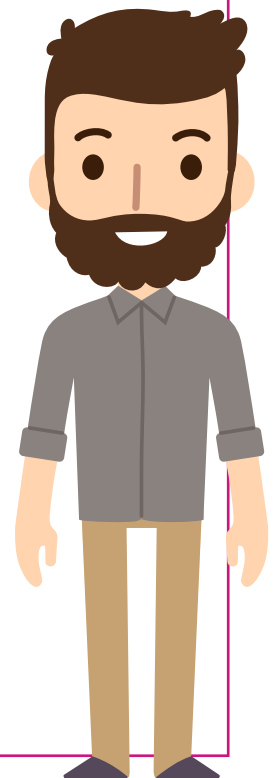
If you supply us with your telephone contact details we may use them to call you, make automated calls or send you operational text messages e.g.

- Confirming repair orders
- Sending reminders about appointments
- Asking you to contact us
- Reminding you to pay your rent

## Sending you e-mails

We may use the e-mail address you provide us with to correspond with you, or provide you with news and information about Together Housing. We may also use your e-mail to send you information about other services you can access, but we will only do this where there is a legitimate reason for doing so.

We may use some of the information we hold about you to tailor the information we send you to make it relevant for you.



## Sharing your personal information

We will only share your personal information where we have a valid legal reason to do so, or where it is in your interests. Where required we will ask for your consent before we share any information.

We may share information with organisations such as the police, local authorities and utility companies where we have a legal obligation to do so or where we work together in partnership with these organisations to meet specific objectives e.g. to help prevent and control anti-social behaviour.

We may also receive information about you from these or similar types of organisation.

We will also share information with contractors and suppliers acting on our behalf to enable them to provide services to you e.g. carrying out repairs, or to ensure that we meet any contractual obligations to you.

We may also share your information with credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

## Keeping your information secure

We store the information you provide us electronically on secure servers.

We implement security policies, processes and technical security solutions to protect the information you provide from:-

- Unauthorised access
- Improper use or disclosure
- Unauthorised modification
- Unlawful destruction or accidental loss

When you contact us, we may ask you to provide some information so that we can confirm your identity.

If other people (e.g. family members, support workers, solicitors etc) act on your behalf we will take steps to ensure that you have agreed for them to do so. We do this to protect your information and ensure that other people cannot find out things about you that they are not entitled to know.

We will ensure that our staff and other third parties, who may have access to your information or who process it on our behalf, are appropriately trained and can apply effective safeguards in keeping your information secure.

## How long do we keep your information for?

We only keep hold of your information for as long as it is needed to fulfil the purpose that you originally provided it to us, or where there is a legal reason for keeping the information. We operate information retention policies and have measures in place to securely destroy or delete any information which is no longer needed.

We keep information about current tenancies, such as rent payment history, record of repairs and details of any complaints for the lifetime of the tenancy.

We keep information about any former tenancies for 6 years after the tenancy has ended.

## Contacting us about your personal information

We will be as open as possible with you about the personal information we hold about you, and if something is wrong we want to work with you to put it right.



## Telling us about changes to your personal information

You have the right to have inaccurate or outdated information amended or deleted.

You may also object to us using data that you believe is inaccurate. If any of your circumstances change please contact our Customer Service Team on 0300 555 5560 (Blackburn) or 0300 555 5557 (Halifax).

## Finding out about the personal information we hold about you

You can ask us whether we are keeping personal information about you by e-mailing us at:



data.protection@togetherhousing.co.uk

The General Data Protection Regulation 2018 gives you a number of rights in relation to your personal information. You can find out more about your rights, and get further guidance, on the Information Commissioners Office website [www.ico.org.uk](http://www.ico.org.uk)

## Requesting a copy of your personal information

As part of our service to you, we are happy to provide you with copies of specific documents (e.g. copies of your application or other information you provided us) upon request on an informal basis. If you want to make a larger or more comprehensive request, you can do this formally by making a 'subject access request'.

If you make a subject access request we will provide you with a readable copy of the personal information we hold about you within a month of receiving your request. To make a subject access request, you must contact us to advise us of what information you are requesting. We may ask you to clarify exactly what information you want where this will help us to search for it.

We will also ask you to provide proof of your identity (2 different forms of ID are required) to make sure we are providing information to the right person.

## Contacting us

If you are a Together Housing customer, our customer service team will be able to help you with most queries and requests you may have. If you want to contact us specifically about the privacy of your personal information or to make a subject access request, you can send your request to;



data.protection@togetherhousing.co.uk

### Or by writing to:-

Data Protection Team  
Together Housing Association  
Bull Green House, Bull Green, Halifax HX1 2EB

## Questions and complaints

Please tell us if you have a concern about the personal information we hold about you, or how we use it. We'll do our best to help.

If, after contacting us, you are still not satisfied you can complain to the Information Commissioner by visiting; [www.ico.org.uk](http://www.ico.org.uk)

You can also apply to the Court for compensation for distress and/or damages due to non-compliance with the General Data Protection Regulation.

## Keeping this notice updated

We keep our privacy policy under regular review. This privacy policy was last updated on 1st May 2018.