



## Your Personal Data and Your Privacy

Havebury believes in being open and transparent with everyone about how we process your personal data, so we have produced this notice to tell you:

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

As the freeholder, we will tell you how we use your personal data and we promise to use it only in connection with your **lease**, **keeping people safe** and **monitoring** purposes. We will always make sure that we collect and store your personal data securely.

### Tenancy

We must collect and keep a little data about you, such as your name, address and date of birth to identify you as a leaseholder.

We may also collect contact information such as telephone numbers and email addresses. We use this data to contact you and to help identify you when you call us or email us.

It may also be necessary to share your personal data under strict conditions of confidentiality with our auditors and we may be compelled to share personal data with organisations that have a legitimate right to it.

In rare cases and when necessary to do so, we may share your data with others to commence legal proceedings and/or recover monies owed.

### Keeping people safe

If you live in a flat within a block, we conduct Fire Risk Assessments for your safety and those of others living in the block. These assessments include identifying persons who may have difficulty to evacuate in the event of a fire. Factors such as age and health are important and so we record information about your date of birth and any needs you may have, including mobility problems. This is shared with the Fire Service and other relevant authorities in the event of a fire.

### Monitoring

For all phone calls, we process the timing and duration, external number (or caller ID number), the internal extension numbers and names of employees who are logged into those extensions. This may be used to provide management data for business decisions on resourcing, analyse costs and charges for telecoms and to respond to complaints.

Calls to and from Havebury may be recorded. We will listen to recordings when we wish to understand what was said during a conversation, to respond to complaints and to train our employees.

And now, in a bit more detail...

## 1. Who is responsible for your personal data?

For the personal data that Havebury collects and uses about you, Havebury is the Data Controller. When we refer to Havebury, we mean The Havebury Housing Partnership which is a charitable registered society under the Co-operative and Community Benefit Societies Act 2014 (7648) regulated by the Regulator of Social Housing (LH4339) and whose registered office is Havebury House, Western Way, Bury St Edmunds, Suffolk, IP33 3SP.

As the Data Controller, Havebury controls the way your personal data is collected and the purposes for which your personal data is used. We are registered as a Data Controller with the Information Commissioner's Office (ICO) and our registration number is ZA295927.

## 2. Personal data we collect about you

Personal data is information that relates to you and allows us to identify you, either directly or in combination with other information that we may hold. Your personal data may include your name, address, date of birth and other information relating to your tenancy, keeping people safe and monitoring purposes.

We collect some personal data from you, for example when you are offered a tenancy by Havebury and at other times. We may also receive your personal data from other organisations such as the choice-based letting organisation in your area.

For more information on the parties who may share your personal data with us, please see below.

### Categories of data we collect

Categories	Purpose	Legal basis for processing	Sharing with other organisations
Your name, address and date of birth	To identify you as a leaseholder	You have a lease with Havebury	
Contact information, including telephone numbers and email addresses	To contact you from time to time and to help identify you when contact us	Havebury has a legitimate interest in contacting you by these methods	
Bank account details	If you pay by Direct Debit, we need your bank account details	If you pay by Direct Debit, you have an active agreement with Havebury	Our Direct Debit service provider
Phone calls data	To provide management data for business decisions on resourcing, analyse costs and to respond to complaints	Havebury has a legitimate interest to process calls data	
Call recording	To improve customer service and help resolve complaints	Havebury has a legitimate interest	

Categories	Purpose	Legal basis for processing	Sharing with other organisations
		to process call recordings	

From time to time, we may collect other types of personal data. For example, we may call you to take part in a survey. When we collect data for specific purposes in future, we will inform you at that time of the purpose, legal basis for processing and explain how that data is shared.

### 3. Your rights

You have rights granted to you by the Data Protection Act 2018. You can find out more by visiting the ICO website at: <https://ico.org.uk/for-organisations/guide-to-the-general-dataprotection-regulation-gdpr/individual-rights/>

You have the right to access your personal data at any time. The reason for allowing access is so that you can verify the lawfulness of the processing and to ensure that it is accurate. It will be provided within one month of your request and is free of charge, except where the request is unfounded, excessive or repetitive. We reserve the right in some rare cases not to respond, but we will always explain why.

You have the right to have incorrect or incomplete data rectified. If we have disclosed the personal data to others, we will inform them of the rectification unless this proves impossible or involves disproportionate effort.

You have the right to request erasure of your personal data or object to processing. If we agree with you, we will comply. You have the right to refuse processing of your data for marketing purposes.

If you would like to exercise any of your rights of your personal data, please visit [www.havebury.com/aboutmydata](http://www.havebury.com/aboutmydata)

### 4. Security of your personal data

We are committed to taking appropriate technical and organisational measures to protect your personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage to personal data.

### 5. Sharing your personal data

We may share some of your personal data with, or obtain your personal data from, the following categories of third parties:

- **The local authorities in which you live**  
Please visit [www.gov.uk/find-local-council](http://www.gov.uk/find-local-council) to find out which local authorities provide services in your area.
- **Contractors that work on our behalf**

The list of contractors that work with us changes regularly, so please visit [www.havebury.com/aboutmydata](http://www.havebury.com/aboutmydata) for up-to-date guidance.

We will also share personal data with organisations that have a legitimate right to it. In such situations, those organisations will need to demonstrate that they have the legitimate right to your data and they can receive the data in a secure way.

We use data processors who are third parties who provide elements of services for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct. These organisations are audited by Havebury to ensure compliance”

Where we provide links to websites of other organisations, this privacy notice does not cover how that organisation processes personal information. We encourage you to read the privacy notices on the other websites you visit.

## 6. Further information

If you have any questions about how your personal data is processed by Havebury or you need any part of this document explaining, please visit [www.havebury.com/aboutmydata](http://www.havebury.com/aboutmydata) or email [data.protection@havebury.com](mailto:data.protection@havebury.com)

If you are not satisfied with the response you receive you have the right to lodge a formal complaint to:

Information Commissioner's Office (ICO)  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Telephone: 0303 123 1113  
Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

We keep our privacy notices under annual review, and we will update them if we undertake any new or amended processing. This privacy notice was last updated in December 2019.