

# Privacy Notice for our Contract Holders



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This Privacy Notice looks at how we (United Welsh Housing Association Ltd) handle your personal data for our core business as a Registered Social Landlord providing affordable homes.

Some of our other activities have separate Privacy Notices in line with our Privacy Policy.

These are available to view on our website [www.unitedwelsh.com](http://www.unitedwelsh.com) or by contacting us as follows:

 0330 159 6080

 [data.protection@unitedwelsh.com](mailto:data.protection@unitedwelsh.com)

 United Welsh Housing Association Ltd, Y Borth, 13 Beddau Way, Caerphilly, CF83 2AX

Our Data Protection Officer is Nia Roblin, Company Secretary, who can be contacted using the methods above.

## How we use your personal information?

Most of the information we use is information you have given us directly about yourself or the people you live with. However, some may be information that we are given by a third-party organisation such as a local authority, the Police or third sector support charity, or some may be information that is publicly available.

Information category	Why do we need it?	Legal bases
Basic details such as*: • Name • Address • Email addresses • Phone numbers • Date of birth	To be able to provide you with a contract and manage that contract in line with our legal obligations as a landlord.	• Contract • Legal Obligation
	To be able to contact you as part of reviewing the services we offer and ensuring we are meeting the needs of our contract holders and our communities.	• Legitimate Interests
Contract management information such as*: • Financial information and benefit entitlement • Employment history • Language preferences • Support requirements • Anti-social behaviour • Complaint management and insurance claims	To be able to provide you with a contract and manage that contract in line with our legal obligations as a landlord including developing personalised support plans if needed.	• Contract • Legal Obligation
	To be able to review the services we offer and ensure we are meeting the needs of our contract holders and our communities.	• Legitimate Interests
	Defend ourselves against legal allegations and claims	• Legitimate Interest

Special categories such as*: <ul style="list-style-type: none"> <li>• Health information</li> <li>• Criminal convictions or offences</li> <li>• Race, ethnic origin, religion</li> <li>• Sex life or sexual orientation</li> </ul>	To be able to provide you with a contract and manage that contract in line with our legal obligations as a landlord.	<ul style="list-style-type: none"> <li>• Contract</li> <li>• Legal Obligation</li> <li>• Vital Interests</li> <li>• And secondary base: Employment, social security and social protection</li> </ul>
	We are legally required to ensure we do not discriminate against any groups of protected characteristics.	<ul style="list-style-type: none"> <li>• Legal Obligation</li> <li>• And secondary base: Employment, social security and social protection</li> </ul>
	To be able to review the services we offer and ensure we are meeting the needs of our contract holders and our communities.	<ul style="list-style-type: none"> <li>• Legitimate Interests</li> <li>• And secondary base: Employment, social security and social protection</li> </ul>
Familial or relationship Information such as*: <ul style="list-style-type: none"> <li>• Household makeup</li> <li>• Number of children and their ages</li> <li>• Next of kin</li> </ul>	To be able to provide you with a contract and manage that contract in line with our legal obligations as a landlord.	<ul style="list-style-type: none"> <li>• Contract</li> <li>• Legal Obligation</li> </ul>
	To be able to review the services we offer and ensure we are meeting the needs of our contract holders and our communities.	<ul style="list-style-type: none"> <li>• Legitimate Interests</li> </ul>
Images / photographs	Identification purposes.	<ul style="list-style-type: none"> <li>• Legitimate Interest</li> </ul>
	Promotional purposes such as press releases, publications and social media campaigns.	<ul style="list-style-type: none"> <li>• Consent</li> </ul>
CCTV	We operate a number of CCTV schemes at our offices, our supported specialist housing schemes and our apartments with communal entrances and spaces for crime prevention.	<ul style="list-style-type: none"> <li>• Legitimate Interest</li> </ul>
	Anti-social behaviour management in line with our contract agreements and duties as a landlord.	<ul style="list-style-type: none"> <li>• Contract</li> <li>• Legal Obligation</li> </ul>
	Health and Safety and legal requirements as a landlord and a responsible employer.	<ul style="list-style-type: none"> <li>• Legal Obligation</li> </ul>
Voice Call Recordings	All telephone calls made to or from our numbers are recorded for training and monitoring purposes.	<ul style="list-style-type: none"> <li>• Legitimate Interest</li> </ul>

\*The examples given of the information that we use are not exhaustive lists.

## Who do we share your personal data with?

In order to manage your contract, we need to share your information with our subsidiary Celtic Horizons Ltd and Mears Ltd who provide our repairs and asset management service.

We may also need to share contact details with sub-contractors who work for us or for Celtic Horizons so that they can contact you to make an appointment to visit.

We may also share information with:

- Local authorities, for example, to process housing benefit claims
- Other social landlords to process mutual exchanges

- TSM, a company that acts on our behalf to help you set up utility supplies so that everything is ready for when you first move in.
- The Police, or other agencies for purposes such as support provision or crime investigation and prevention.
- We also use various technology systems to handle your data, and some of those require us to share data outside of the EEA.

We will only share your information if:

- There are laws that allow us to do so
- We have a legitimate interest in doing so
- When we can be confident the data we share is secure
- When we are confident that you would reasonably expect us to share your information. For example, when reviewing our services to make improvements that would benefit you.
- When we are confident the data we share is secure.

We may also share your information when you have given us explicit consent to share your information.

## How long do we keep your information for?

The length of time we keep your information for will depend on why we need to process it. We will keep it in line with our retention schedule, legislative requirements and best practice guidance until the data is no longer needed for the purpose it was collected. Following this the information will be destroyed and disposed of in a secure manner. If we are required to keep the information for statistical purposes we will anonymise or pseudonymise it where possible.

## Your individual rights

You have a number of individual rights under the General Data Protection Regulation (GDPR).

You have the right to access the personal information that we process about you. If you believe the personal information we hold on you is inaccurate or incomplete, you have the right to have it corrected or completed. Where we are using your information based solely on your consent, you also have the right to withdraw this consent at any time by contacting us.

You also have the right, in certain circumstances, to block the processing of your data; object to some types of processing; have your data deleted or in some cases transferred to another organisation of your choice.

More information about all of these rights can be found on our website [www.unitedwelsh.com](http://www.unitedwelsh.com) or by visiting [www.ico.org.uk](http://www.ico.org.uk)

## Storage of your personal data

To enable us to provide you with a contract we will store your personal data on a number of electronic systems. Some of these systems are held on site in our privately owned corporate network or in a Cloud-based service. Where the latter occurs, we work closely with the providers to ensure the security of your information is in line with legal requirements.

We also use paper records when necessary; for example, personal evacuation plans for residents at a sheltered scheme or hard copies of contract agreements. These are held in locked storage that is only accessible by relevant members of staff.

None of your information is ever stored or shared outside of the European Economic Area.

## Not happy with any of this?

If you are not happy with any of the ways we handle your data then please tell us by using the contact details on the first page of this privacy notice.

If you are still not happy, you are able to complain to the UK's supervisory authority for data protection, the Information Commissioner's Office, by visiting [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) or by calling 0303 123 1113.

