

# CHP PRIVACY NOTICE



CHP is committed to protecting your privacy and this Privacy Notice explains how we use information about you and how we protect your personal data. Data protection in the UK is governed by the Data Protection Act 2018.

Personal data is the information we hold about you.

We have a Data Protection Officer who makes sure that we respect your rights and follow the law. If you have any questions please contact our Data Protection Officer:

**Email:** [dpo@chp.org.uk](mailto:dpo@chp.org.uk) (please put DPO in the email subject line);

**Call:** 0300 555 0500

**By post:** CHP Data Protection Officer, Myriad House, 33 Springfield  
Lyons Approach, Chelmsford, Essex, CM2 5LB

## What information do we collect?

As a landlord CHP **collects, uses, manages and stores personal data** of people applying to us for housing as well as our current residents. If you live in one of our properties we use your information to provide services related to your tenancy or lease.

**Personal data** can be any information that identifies and relates to a living person. This can include information that, when put together with other information, can then identify a person. For example this could be your name and contact details.

The type of information we collect from you to provide services includes contact details such as you name, date of birth, previous address, telephone numbers, email address, National Insurance number and financial information.

We may also collect more sensitive information, such as ethnicity, religion and sexuality; details of any support needs you may have; next of kin/emergency contacts; disability information; unspent convictions and criminal offences attracting a custodial sentence.

We will always talk to you about your information and why we need it when we collect it from you.

You can see a full table showing what data we collect, what we do with it and how long we keep it at the end of this privacy notice.



## Why do we collect and store your personal information?

In order for us to provide you services related to your tenancy or lease we need to collect some personal information.

We also process personal data to **pursue our legitimate interests**. This means helping us to do our job as a housing provider, for example making sure our properties are let to appropriate people or reducing the risk of damage to our properties.

We are committed to ensuring that the information we collect and use is appropriate for this purpose, and is not an invasion of your privacy.

We would never pass on your details to third party marketing companies without asking for your permission first. If you do agree to this, then you keep the right to withdraw your consent at any time.



## What do we do with the data we collect?

We use the data we collect, store, use and manage so that we can deliver our services to you. We use your data to:

- manage allocations and lettings;
- manage tenancies;
- receive rent and service charges;
- provide a repairs and maintenance service;
- offer welfare benefits advice;
- provide support services;
- resolve anti-social behaviour disputes;
- investigate complaints;
- engage with customers to get feedback on our services;
- provide education, employment and training advice and opportunities;
- support residents who are impacted by welfare reform.



We will do our best to keep your data accurate and up to date, and not keep it for longer than is necessary. We are required by law to keep some data, for example information needed for income tax and audit purposes. Some other types of personal data may need to be kept for longer periods depending on the reasons we have collected it. You can ask us about how long we need to keep your data and why we need it when we collect it from you.



## Our promises to you

We take the issue of your privacy extremely seriously and we promise to:



- respect your personal data and keep it secure on your behalf;
- allow you to access the data that we hold about you;
- let you know how we use your data. We may update this notice, or contact you directly, from time to time to provide you with more information about how we use your data and protect your privacy;
- keep your data accurate and up to date by amending your records when you contact us or by asking you, from time to time, if the information we hold on you is still up to date;
- help you move your data to another landlord, if you want us to do so. If you stop having a tenancy with us, we will delete your data as soon as we are able to (certainly within 6 years) unless you still owe us money or have been evicted for anti-social behaviour, where we may keep your data for longer.

## Your rights

The law gives you a number of rights to control what personal data is used by us and how it is used by us. You have the right to:

- be informed about what we do with your data . This privacy notice (which may be updated from time to time) is the principal way we will do this;
- access the data we hold about you;
- object to CHP processing your data (on the basis of our legitimate interests);
- tell us to correct your data where it is inaccurate and to ask us to stop processing your data until it has been corrected. If you think the data we hold on you is not accurate then please contact our Service Centre on 0300 555 0500 or visit our online portal;
- ask us to erase your data. We will only do this if we no longer have any contractual obligations to you or there are compelling reasons to retain your data and we promise to explain these to you;
- ask us to move your data to your new landlord free of charge if you transfer to another property owned by a different landlord.



## Why do we record telephone calls?

When you speak to someone at CHP on the telephone we may record the conversation. We record calls for training and monitoring purposes to help us do our job well and to provide excellent customer service. This may include: verifying information that you have given to us, reviewing calls to respond to complaints and protecting our staff from verbal abuse.

Whenever you telephone us we will tell you that we are recording the call. Call recordings are kept for 12 months and then securely destroyed. We consider that it is in our legitimate interest to do this, however you do have the right to object to us recording your calls with us. If you wish to object please tell one of our Service Centre Advisors or ask to speak to the Data Protection Officer.



## Who do we share your information with?

We may pass your personal data on to companies and people who work with us in providing housing related services to you. These are known as 'third parties'. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf, such as servicing your boiler, conducting maintenance, dealing with new build defects, or improvement works on your home or to help you apply for social security benefits or protect our residents from anti-social behavior. When they no longer need your data to carry out this service, they will dispose of your details in line with CHP's procedures. If we need to pass your sensitive personal information onto a third party we will only do so once we have obtained your permission, unless we are legally required to do otherwise.

The types of organisations we may share your data with are:

- contractors who work with us to provide housing related services to you such as heating engineers, plumbers or carpenters;
- warranty providers and house builders;
- local councils including social services, council tax and housing benefit departments;
- Government agencies such as the Department for Work and Pensions, HMRC and Job Centre Plus;
- financial agencies such as the Payroll Bureau, pensions companies, debt recovery agencies;
- Police, Probation Service or the Fire Service;
- other landlords;
- utilities companies;
- courts;
- health services and support agencies.



## Who can you contact for more advice?

We don't want to be intrusive and don't want to ask you irrelevant or unnecessary questions. The information you give us will be kept securely to minimise the risk of it being accessed by someone who shouldn't have it.

We have a Data Protection Officer who makes sure that we respect your rights and follow the law. If you have any questions please contact our Data Protection Officer:

**Email:** [dpo@chp.org.uk](mailto:dpo@chp.org.uk) (please put DPO in the email subject line);  
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You can also read this privacy notice on our website at [chp.org.uk/privacy](http://chp.org.uk/privacy).

For independent advice about data protection, privacy and other data sharing issues you can contact the Information Commissioner's Office (ICO).

You can also contact the ICO directly if you think we have processed your data in a way which you think is unfair or unlawful, or are unhappy with how we protect your privacy rights in general:

**Visit:** [ico.org.uk](http://ico.org.uk)  
**Email:** [casework@ico.org.uk](mailto:casework@ico.org.uk)  
**Call:** 0303 123 1113 (local rate) or 01625 545745.  
**By post:** Information Commissioner's Office, Wycliffe House, Water Lane,  
Wilmslow, Cheshire, SK9 5AF

CHP Privacy Notice  
Version 2  
February 2019

We may need to up date this privacy notice from time to time,  
please visit [chp.org.uk/privacy](http://chp.org.uk/privacy) to view the latest version.



## The data we collect, what we use it for and how long we keep it

What data we collect/process	What is it used for	Our legal basis for processing your data	How long do we keep it?
Contact information <ul style="list-style-type: none"> <li>• Name</li> <li>• Date of birth</li> <li>• Previous address</li> <li>• IP (Internal Protocol) address</li> <li>• Telephone numbers</li> <li>• Email address</li> </ul>	Your tenancy agreement is a contract between you, any other person in your household (should you hold a joint tenancy) and CHP.  This data is used to set up and maintain your tenancy account with us.	Contractual Basis	Life of tenancy + 6 years after tenancy ends
Call recordings	To help us train our staff and to verify information in the event of a dispute.	Our legitimate interests	Kept for 12 months after the call.
<ul style="list-style-type: none"> <li>• National insurance number</li> <li>• Financial information</li> </ul>	To assess your benefit entitlement and council tax.	Our legitimate interests	NI number – life of tenancy Financial information 6 months
Details of unspent convictions/ criminal offences attracting a custodial sentence/on a register/ person of interest	We use unspent conviction information to house you appropriately.	Our legitimate interests	Life of tenancy but regularly reviewed. If no issues when conviction spent data will be deleted after 1 year following suspension
<ul style="list-style-type: none"> <li>• Details of any support needs you have</li> <li>• Details of those people providing additional support</li> <li>• Next of kin details/emergency contacts</li> <li>• Disability information</li> </ul>	As required by our regulator and to provide information on extra services we provide – such as tenancy support.	Our legitimate interests	Life of tenancy but regularly reviewed
References from previous landlords	We use this information to provide you with support	Our legitimate interests	Deleted after 1 year of tenancy being granted
Proof of right to rent		To fulfil our legal obligations	Life of tenancy
	For analysis purposes, as required by our regulator and to provide information on extra services we provide.	To fulfil our legal obligations	Destroyed after data is recorded
Details of who is living with you	Used to ensure you are not overcrowded or under-occupying a property.	To fulfil our legal obligations	Life of tenancy but regularly reviewed

