



Customer Privacy Notice

Index

1. Summary
2. What is personal data?
3. What is 'special category' data?
4. The purposes for Arawak Walton collecting and storing personal data
5. For how long will data be stored?
6. Visiting our website
7. Arawak Walton's lawful bases for processing data
8. Joined up services - sharing basic details across Arawak Walton.
9. Sharing information with local authorities, community partners and other agencies
10. Your rights
11. How you can find out what personal information we hold about you, whether it is accurate and whom it is shared with
12. The 6 guiding principles of data protection
13. Automated decision making
14. Freedom of information
15. Data Protection Officer

1. Summary

Arawak Walton Housing Association Limited ("Arawak Walton") is a data controller and is committed to complying not only with the letter but also the spirit of all applying data protection legislation. This legislation includes the UK GDPR (the retained EU law version of the General Data Protection Regulation ((EU) 2016/679)) (GDPR), the Data Protection Act 2018 and any other laws, regulations, and secondary legislation, as amended or updated from time to time, in the UK.

The accuracy and security of your personal information is a key responsibility of Arawak Walton and is recognised as an overriding factor in securing your trust and confidence. Arawak Walton will only use the information it holds about you for the purposes set out in this document. It will also only collect adequate relevant and necessary information to fulfil those purposes.

When you provide Arawak Walton with your personal data, you will be informed what it will be used for and who it will be shared with.

2. What is personal data?

Personal data is information that relates to a living individual who can be 'identified' either:

- a) From the information; or
- b) From the information combined with any other information which is already in the possession of, or likely to come into the possession of, the person or organisation holding the information.

The information we may collect about you and others could include:

- Name
- Date of birth
- National insurance number
- Address
- Contact details (phone/mobile/email)
- Racial or ethnic origin
- Religious or other similar beliefs
- Physical or mental health or condition
- Convictions, proceedings and criminal acts
- Photographs and CCTV images

We will also collect personal information about you during the course of providing services to you which will be in connection with your tenancy.

The information includes any expression of opinion about the individual, and any indication of the intentions of the data controller or any other person in respect of the individual.

3. What is 'special category' personal data?

Certain personal data is categorised as 'special category' personal data and includes:

- Racial or ethnic origin
- Religious or philosophical beliefs
- Sexual orientation
- Health information

Data protection legislation requires that for Arawak Walton to use your special category personal data, one of the following specific conditions will apply:

- You provide your 'explicit' consent for how the information will be used for and with whom it will be shared; or
- We have a lawful basis under article 6 and article 9 of the UK GDPR, that is not consent, to process your special category data.

Arawak Walton will collect special category data to promote the health and social wellbeing of tenants. For example, Arawak Walton may collect your health information to ensure the protection of your health in the event of a medical emergency.

4. The purposes for Arawak Walton collecting and storing personal data

We use your information to respond to your queries, provide you with services and manage your relationship with us. We may also use your personal information for technical administration, research and development, customer administration, marketing and to identify areas where we can improve the services we provide.

In order to provide you with adequate services Arawak Walton need to collect personal data for correspondence purposes and/or detailed service provision. Arawak Walton may also need to share your personal data with other service providers who are contracted to carry out services on our behalf. These providers are required to keep your personal details secure and use them only to fulfil your service request.

Arawak Walton will process, i.e. collect, store and use the information you provide in a manner that is compatible with the data protection legislation. Arawak Walton's aim is not to be intrusive, and it undertakes not to ask irrelevant or unnecessary questions. Moreover, the information you provide is subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

5. For how long will data be stored?

Your information will be retained throughout the duration of your tenancy for the purposes set out above.

Once your service has been delivered or your tenancy has ended, your information will be retained for a specified period to enable any further related services to be delivered to you or to allow you or Arawak Walton to deal with any follow up issues about the quality of the service provided. Once we can no longer identify a purpose for retaining your data the information will then be destroyed in a controlled manner. The retention of this information will be in accordance with Arawak Walton's Document Retention Policy.

6. Visiting our website

When you visit Arawak Walton's website, we collect standard internet log information for statistical purposes. Details of how we do this are on our privacy Policy page.

- We use cookies to collect information in an anonymous way, including the number of visitors to the site, where visitors have come to the site from and the pages they visited

- We do not make any attempt to identify visitors to our websites and don't associate information gathered from our sites with personally identifying information from any source
- When we collect personal information, e.g., via an online form, we will explain what we intend to do with that data
- Our websites contain links to various third-party websites. We are not responsible for the content or privacy practices of any external websites that are linked from Arawak Walton's website

7. Arawak Walton's lawful bases for processing data

Under Article 6 of the UK GDPR, Arawak Walton requires a legal basis for processing your personal data. We use the following legal bases:

- We have a legal obligation; or
- We have a legitimate interest; or
- We need your consent.

Where we need your consent, you are able to withdraw your consent at any time. You can do this by contacting us using the contact details provided in this document.

Wherever necessary, we will seek your consent at the time that the information is provided, for example on housing application forms or when signing your tenancy agreement. However, where Arawak Walton and its partners already hold information, this may not always be practical. In such circumstances Arawak Walton and its partners will maximise awareness by prominent articles in Tenant newsletters, leaflets and on Arawak Walton's website.

These articles and leaflets will not identify you or any other individual but will provide details about the type of personal information to be shared so that you will be able to judge whether your personal information is likely to be used. A named officer and contact details will also be supplied to enable you to find out further information and, if necessary, allow you to object to your personal data being used in this way.

8. Joined up services - sharing basic details across Arawak Walton.

Arawak Walton is serious about delivering accessible, appropriate, timely and effective services and it is important that it can properly coordinate what it does for your benefit. To achieve this it aims to improve its centralised customer database so that it acts as a hub for all services. This means, for example, that the system can report any change of address to all the services that use the database, so you won't have to repeat it every time you contact Arawak Walton.

Over time Arawak Walton's aim is to ensure that it has one master record containing your details, together with information about the nature of your transactions. It will help Arawak Walton to tailor services to meet your needs and ensure that your

requests are being dealt with effectively and help to prevent them getting lost in the system.

9. Sharing information with local authorities, community partners and other agencies

To promote the social wellbeing of our tenants, Arawak Walton may need to share your personal data with local authorities and partners. However, where this is the case, Arawak Walton will notify you if your information is intended to be used in this way. When using your data in this way, we will do so under at least one of the lawful bases listed in section 7 of this statement.

The need to share this information for promoting social wellbeing will only be in circumstances where the balance of benefit to you and the community outweighs the possibility that you or any other individual could suffer any detriment. The likelihood of any such detriment will also be further reduced by strict data sharing protocols between Arawak Walton and its partners and tight security in terms of the transfer of information. Access to your personal information will also be restricted to authorised individuals on a strictly 'need to know' basis.

Arawak Walton has a responsibility to work with local authorities and community partners such as the Police, Fire & Rescue Service, voluntary services, charities and Health Services in order to preserve life, reduce accidents, reduce crime and improve our tenants' life circumstances.

If Arawak Walton needs to share your special category personal data with a third party it may need your consent. In all circumstances Arawak Walton will be open and informative about why the data sharing is necessary and with whom it will be shared..

You need to be aware that Arawak Walton is required periodically to share your information with other agencies to help reduce crime or investigate fraud. An example of this is in reducing Housing Benefit fraud and involves Arawak Walton sharing Housing Benefit data to ensure that tenants are not claiming illegally. This is managed under the direction and security of a National Government Agency known as The Audit Commission. The shared data will not be used for any other purpose. Arawak Walton also works closely with local authorities and community organisations and often needs to share information with them in order to deliver your services. However, Arawak Walton will not supply these organisations with your information unless it is satisfied that equal measures are in place to protect the information from unauthorised access. Arawak Walton will not supply your information to any organisation for marketing purposes.

Your information will only be shared where the law allows and where there are strict data sharing protocols between Arawak Walton and its partners and tight security in terms of the transfer of information. Access to your personal information will also be restricted to authorised individuals on a strictly 'need to know' basis.

10. Your rights

As a data subject, you are entitled to the following rights under the UK GDPR:

- a) Right of confirmation as to whether personal data concerning them are being processed;
- b) Right of access to their stored personal information;
- c) Right to rectification of their personal data;
- d) Right to erasure (Right to be forgotten);
- e) Right of restriction of processing of personal data;
- f) Right to data portability;
- g) Right to object to the storage of personal data;
- h) Right not to be subject to automated individual decision-making which produces legal effects; and
- i) Right to withdraw consent to the processing of personal data.

Where you have provided consent to our use of your data, you also have the unrestricted right to withdraw that consent at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent.

Your ability to exercise these rights are subject to Arawak Walton's rights and obligations as a data controller.

11. How you can find out what personal information we hold about you, whether it is accurate and whom it is shared with

Arawak Walton's contact details are as follows:

Arawak Walton Housing Association Limited
23 Manor Street
Ardwick
Manchester
M12 6HE

Tel: 0161 272 6094

Email: info@arawakwalton.com

You may be asked for proof of your identification to ensure that your personal information is not provided to someone else.

You should be aware that in supplying you with your personal information, the Data Controller cannot supply you with the personal information of anyone else and you may find that documents have been redacted to remove third party personal data including names and addresses.

If you are concerned about how we are collecting, using and/or sharing your personal information, you can contact our Data Protection Officer. You can also obtain more information on your rights and our obligations as a Data controller by contacting the Information commissioner as follows:

The Information Commissioner
The Information Commissioner's Office
Wycliffe House
Wilmslow
Cheshire
SK9 5AF
Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)

The Information Commissioner can also be accessed via their website:
<https://ico.org.uk/>

12. The 6 guiding principles of data protection

The GDPR contains six principles, which organisations must comply with. Arawak Walton and its partners will ensure that when processing your personal and special category personal data it will be:

- Lawfully, fairly and transparently processed
- Processed for specified explicit purposes
- Adequate, relevant and necessary
- Kept accurate and up to date
- Kept no longer than is necessary for the purpose processed
- Kept securely, preventing unauthorised or unlawful access

13. Automated decision making

No decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

14. Freedom of information

Unlike local authorities and other public bodies, Arawak Walton, as a registered social landlord with charitable status, is not a 'public authority' as defined in the Freedom of Information Act 2000.

Despite the fact that we are not obliged to provide information requested under the Freedom of Information Act, Arawak Walton as a whole is committed to being as open and transparent as reasonably possible and therefore staff are encouraged to use their professional judgement to consider whether or not it would be reasonable to disclose non-personal information requested by individuals.

15. Data Protection Officer (DPO)

Arawak Walton has appointed a DPO which is HY Solicitors. The DPO can be contacted by telephoning 0161 804 1144 or by email at dpo@wearehy.com or by post to 1 Reed House, Hunters Lane, Rochdale, OL16 1YL.

You can contact the DPO about any data protection matters.