



# Privacy Policy

## Introduction

This Privacy Policy sets out how MossCare St Vincent's Housing Group (MSV) will collect, store, use, share, and protect (collectively known as 'process') your information. If you are a customer of MSV your tenancy agreement will contain further information about how we process your information.

By giving MSV your information, or by using our website or other digital platforms, such as our on-line app, you are agreeing to this privacy policy. If you do not accept this Privacy Policy, please do not give us any information or use our website/ platforms/ portals.

This privacy policy explains when and why we collect personal information about you, how we keep it secure, how we use it and who we share it with. This privacy policy applies to information about housing applicants, residents, tenants, leaseholders, service users, job applicants, colleagues and any other customers of MSV.

This privacy policy applies to personal data held by the MossCare St Vincent's Housing Group (including Mossbank Homes, VHS, and MossCare Shared Services) whether that information is collected via our website or through any other means.

## Who we are

MossCare St Vincent's (hereafter referred to as MSV) is a Registered Social landlord operating in the North West of England, UK. We own and manage more than 8,500 homes across the North West of England. Our mission is to create communities where people can flourish and build homes they can be proud of.

Any personal information provided to or gathered by MSV is controlled by the MossCare St Vincent's Housing Group, Trafford House, Chester Road, Manchester, M32 0RS.

MSV is responsible for collecting, processing, storing and safe-keeping personal and other information as part of our business activities. We manage personal information in accordance with the General Data Protection Regulation and are registered as a Data Controller with the Information Commissioner's Office (registration number ZA269136).

## How We Control Your Personal Information

We have a Data Protection Officer to make sure MSV respect your rights and follow the law. If you have any concerns or questions about how we look after your personal information, please contact the Data Protection Officer, Vince Ormrod, at:- [DataProtection@msvhousing.co.uk](mailto:DataProtection@msvhousing.co.uk) or by calling 0161 226 4211 and asking to speak to the Data Protection Officer.

## **What is personal information?**

Personal information can be anything 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.

We may apply markers to your information (for example, in relation to your vulnerability or health status) to allow us to tailor and deliver services to you.

We will regularly review the personal information we hold about you and make changes to any service or information / handling processes when the law or the Information Commissioner requests such changes.

## **What are special categories of data?**

Some information is 'special' and needs more protection due to its sensitivity. It's often information you would not want widely known and is very personal to you. This is likely to include anything that can reveal your:

- sexuality and sexual health
- religious or philosophical beliefs
- ethnicity
- physical or mental health
- trade union membership
- political opinion
- genetic/biometric data
- criminal history

## **How we collect and use your personal information**

The law allows us to use your personal information for a number of legal reasons which would include, but not limited by:-

- you, or your legal representative, have given consent
- you have entered into a contract with us
- it is necessary to perform our statutory duties
- it is necessary to protect someone in an emergency
- it is required by law
- it is necessary for employment purposes
- you have made your information publicly available
- it is necessary for legal cases
- it is to the benefit of society as a whole
- it is necessary to protect public health

When we process your personal information for our legitimate interests, we will consider and balance any potential impact on you and your rights under data protection and any other relevant law. Our legitimate business interests do not automatically override your interests – we will not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

MSV will collect and use your information to enable us to respond to your enquiries, provide you with services and manage your relationship with us and to identify areas where we can improve the services we provide.

We collect most of our information directly from you. This happens in a number of ways, but is not limited to, when you contact us via our website or mobile app, write to us, meet with our staff or phone us.

We will collect information from you:-

- When you complete an application form for one of MSV's properties
- When you sign a tenancy agreement
- When you report a repair to our customer contact centre
- If you report an incident of anti-social behaviour or hate crime
- If you log-in to the on-line portal or use other on-line services
- When you respond to a survey
- When you interact with us on social media
- When you email us
- When you speak to a member of staff, either face to face or over the telephone

## **What information we collect**

We will collect a range of information including, but not limited to:-

- Your name
- Contact details, for example email address, mobile phone number
- Your family composition
- Postal address
- Bank account details
- Information regarding previous tenancies
- Information regarding reports of anti-social behaviour or any court appearances
- Any outstanding money owed, for example outstanding recharges or rent due
- Information collected through cookies as explained in our cookies policy

We also collect information from other third parties where it is relevant to do so. This includes, but is not limited to:-

- Local councils and central government departments such as the Department of Work and Pensions – for information about your benefits
- Local authorities, health and social care professionals, previous care providers – for information about your health, care and support needs, and those of your household (including your children)
- Previous landlords and credit agencies such as Experian – for your rental history, credit checks and information about your financial status/history
- Local authorities – for information about services provided
- Police and other public authority fraud departments, local authorities – for information on criminal activity, but only where it is relevant to your tenancy or application
- Other residents – we may receive information in relation to complaints
- Current, past or prospective employers
- Family, associates and representatives of the person whose personal data we are processing
- Educators and examining bodies
- Financial organisations

- Auditors
- Survey and research organisations
- Other housing associations or trusts
- Trade unions and associations
- Health authorities
- Enquirers and complainants
- Security organisations
- professional advisers and consultants
- Homes England
- The Financial Conduct Authority
- The Care Quality Commission
- Probation services
- Charities and voluntary organisations
- Courts and tribunals
- Professional bodies
- Employment and recruitment agencies
- Credit reference agencies
- Debt collection agencies
- Landlords
- Press and the media
- Other companies in the same group

We'll often complete a privacy impact assessment (PIA) before we share personal information to make sure we protect your privacy and comply with the law.

## **We will only ask you for the data we need!**

Where we can, we'll only collect and use personal information if we need it to deliver a service or meet a requirement.

We will never sell your personal information to anyone else.

If we have consent to use your personal information, you have the right to remove it at any time. If you want to remove your consent, please contact [DataProtection@msvhousing.co.uk](mailto:DataProtection@msvhousing.co.uk)

## **Sharing information with our contractors and suppliers**

There are some cases when we will share your information to support legitimate business purposes. We do this to make sure that we can meet your needs, and also to meet our health and safety obligations towards those delivering services on our behalf. This may include sharing information with our contractors and suppliers to allow them to carry out duties on our behalf or to meet contractual obligations we may have. For example, we may share information to make appointments with you to carry out repairs and/or deliver services. Sometimes we have a legal duty to provide personal information to other organisations including:

- if the court orders that we provide the information; and
- in order to find and stop crime and fraud; or if there are serious risks to the public, our staff or to
- to protect a child; or

There may also be rare occasions when the risk to others is so great that we need to share information straight away.

If this is the case, we'll make sure that we record what information we share and our reasons for doing so. We'll let you know what we've done and why if we think it is safe to do so.

## **How do we protect your information?**

MSV will make sure that the personal information we hold on you is held securely including electronically and paper. Examples of our security include:

- Encryption which is the process of converting information or data into a code, especially to prevent unauthorized access. MSV use encryption to protect personal information transmitted online.
- Pseudonymisation, MSV will hide parts of your personal information from view. That way somebody outside of the Association could work on your information without being able to identify the individuals who's personal data they are dealing with.
- Controlling access to systems and networks to prevent unauthorised access to your information.
- Training and awareness for our staff allows us to make sure staff know how to handle information and what to do to when something goes wrong.
- Regular testing of our technology and ways of working including keeping up to date on the latest security updates.

## **Access to Personal Information**

We can provide details on what personal information we hold once you make a subject access request.

The General Data Protection Regulation gives you the right to obtain:

- Confirmation that your data is being processed
- Access to your personal data
- Other supplementary information

Under normal circumstances, we will not charge you a fee to provide this information to you.

We will endeavour to provide you with the information as soon as possible, and no later than within one month of receipt of your request. If your request is complex, we may require a two month extension to complete your request. If this is the case, we will inform you within one month of the receipt of your request to explain why the extension is necessary. We may also ask you to provide evidence to verify your identity.

If you want to make a Subject Access Request, please read through this leaflet and fill out the form, so that you can return them to us:

[Data Protection a guide to your rights .pdf](#)

## Accuracy, Retention, and Objecting to the use of Personal Information

We will normally retain your personal information for the period as necessary to maintain your tenancy or to provide you with the services/ products required unless a longer retention period is required or permitted by law or necessary to defend legal claims.

In accordance with General Data Protection Regulation, you have the right to have your personal data corrected if it is inaccurate or incomplete. You also have the right to erasure of your personal data. Where data is provided on the basis of your consent you have a right to withdraw this at any time.

You also have the right to object to:

- Processing based on legitimate interests or the performance of a task in the public interest
- Direct marketing
- Processing for the purposes of scientific/historical research.

You have several rights which allow you to choose and control how we use your data. These rights are explained below. If you would like to exercise these rights, please see the [Contact us](#) section of our website for details of how to get in touch.

**Transparency:** You have the right to be informed about how we are using your data. If you think we are doing something with your information that we have not told you about in this Privacy Notice, you can object to this.

**Access:** You have the right to ask us what personal information we hold about you, and to request a copy, free of charge. Please note if we consider that the request is manifestly unfounded, excessive, or repetitive, we can charge a reasonable fee. This fee will be based on the administrative cost of providing the information.

**Objection:** You can object to the processing of your personal data. You should note that this right does not apply in all circumstances, for example, where we are processing information because it is necessary in the performance of contract we will not be able to stop processing this information.

**Withdrawal of consent:** if we are processing your data based on your consent, you can withdraw this consent at any time. Where this is the case we may no longer be able to provide the relevant service to you.

**Rectification:** If you think that the personal data we hold about you is inaccurate or incomplete, you have a right to request that it be rectified.

**Erasure:** You can ask us to delete your personal data where it is no longer necessary for us to use it, where you have withdrawn consent (if we process based on consent), or where we have no lawful basis for keeping it.

**Restriction:** You can ask us to restrict the personal data we use about you where you have asked for it to be erased or where you have objected to our use of it.

**Data portability:** You can ask us to provide you, or a third party (if possible), with some of the personal data we hold about you in a structured, commonly used, electronic form, so that it can be easily transferred.

**Appeal:** If you are not satisfied with the way that we have dealt with your personal data, please let us know and we will try and resolve your concerns. If you are not satisfied with the outcome, you can make a formal complaint through our website.

If you are still not happy with our response, you have the right to appeal directly to the regulator – the **Information Commissioners’ Office** <https://ico.org.uk>, **Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF**. Telephone: [0303 123 1113](tel:03031231113).

## **Visitors to our websites**

We use a third party service, Google Analytics, to collect standard internet log information and details which shows us ‘visitor behaviour’ on our Site. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

## **Use of cookies by Mosscafe St Vincent’s Housing Group**

You can read more about how we use cookies on our [Cookies page](#).

## **Other people’s cookies**

We use videos from YouTube and feeds from other websites such as Facebook and Twitter. These websites place cookies on your device when watching or viewing these pages.

## **Turning off cookies**

You can turn cookies off to prevent them being downloaded on to your computer or other device by selecting the appropriate settings on your browser. However if you do this you may not be able to use the full functionality of this website.

Further information on cookies can be found at [AboutCookies.org](http://AboutCookies.org). You can also opt out of being tracked by Google Analytics.

## **Links to other websites**

This privacy policy does not cover the links within this site linking to other websites, for example Local Authority Choice Based Lettings systems. We encourage you to read the Privacy Policies on the other websites you visit.

## **Supervisory Authority**

In the event that you believe that there has been a personal data breach, complaint or for independent guidance in regards to Data Protection, you can contact the [Information Commissioner's Office](#) .

## **Information Commissioner's Office**

Wycliffe House

Water Lane

Wilmslow

Cheshire SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.

Alternatively, visit [ico.org.uk](http://ico.org.uk) or email [casework@ico.org.uk](mailto:casework@ico.org.uk).

## **Changes to this privacy notice**

We keep our privacy notice under regular review. This privacy notice was last updated on 24 May 2018.

## **How to contact us**

If you want to request information about our privacy policy you can [contact us here](#) or email [enquiry@msvhousing.co.uk](mailto:enquiry@msvhousing.co.uk) or write to us at:-

Mosscaire St Vincent's Housing Group

7<sup>th</sup> Floor

Trafford House

Chester Road

Old Trafford

Manchester

M32 0RS