



## Catalyst Housing Ltd and Aldwyck Housing Group Limited

### Privacy statement for applicants, tenants, leaseholders, and customers

1 May 2019

#### Key Points

- **Why do we use your data?** We use your personal information to determine your application relating to a tenancy/lease and/or to provide services to you under the agreement we have entered into, or are proposing to enter into, with you, and/or to provide support services at your request.
- **We use your sensitive data:** During your tenancy we may collect and use information about your health, religion, racial and ethnic origin, sexual orientation or criminal convictions and offences.
- **Sharing data:** We may share your data with third parties, including third-party service providers, subsidiaries and other entities in the group.
- **Security:** We respect the security of your data and treat it in accordance with the law.
- **International transfer:** We shall not transfer your personal data outside of the European Economic Area.

#### 1 Purpose of our privacy notice

- 1.1 Under the data protection legislation, we are required to explain to you why we are asking for information about you, how we intend to use the information you provide and whether we will share this with anyone else.
- 1.2 This statement applies to all applicants, tenants, leaseholders and customers of Catalyst Housing Ltd and Aldwyck Housing Group Limited.
- 1.3 We may update this statement at any time.

1.4 It is important that you read this statement so that you know how and why we use information about you. It is also important that you inform us of any changes to your personal information during your application process so that the information which we hold is accurate and current.

## 2 Who are we?

2.1 We are:

2.1.1 Catalyst Housing Ltd (**Catalyst**), registered office Ealing Gateway, 26–30 Uxbridge Road, London W5 2AU; and

2.1.2 Aldwyck Housing Group Limited (**Aldwyck**), registered office Ealing Gateway, 26–30 Uxbridge Road, London W5 2AU.

2.2 Any reference to “we”, “our” or “us” in this statement is a reference to both Catalyst and Aldwyck.

2.3 We are "data controllers", meaning that we are responsible for deciding how we hold and use personal information about you.

## 3 The merging of Catalyst and Aldwyck

3.1 Catalyst and Aldwyck are merging and further information about how this will affect you can be found here: <https://www.chg.org.uk/our-business/catalyst-and-aldwyck/catalyst-and-aldwyck-information-for-customers/>

3.2 In the short term, Catalyst and Aldwyck will remain as two separate entities, with Aldwyck a subsidiary of Catalyst. Eventually, Catalyst and Aldwyck will combine to create a single entity.

3.3 This privacy statement is being provided to you to explain how your personal information will be effected during the merger process (i.e. whilst Catalyst and Aldwyck are two separate entities), which we expect to be finalised by April 2021. Once the merger is complete, we will provide you with an updated privacy statement.

3.4 If you are an **applicant, tenant, leaseholder or customer of Aldwyck**, your personal information will be gradually migrated to Catalyst during the merger process, and that information may be processed by Catalyst where this is necessary for any of the reasons set out below at paragraph 8. As this progresses, we will be providing you with regular updates.

3.5 If you are an **applicant, tenant, leaseholder or customer of Catalyst**, your personal information will remain on Catalyst's systems and will not be transferred to Aldwyck. During the merger process, as Catalyst and Aldwyck will be gradually sharing information systems, your information may be accessed by Aldwyck (as a Catalyst subsidiary) where this is necessary for any of the reasons set out below at paragraph 8.

#### **4 Our Data Protection Officers**

4.1 Our Data Protection Officers are responsible for overseeing what we do with your information and monitoring our compliance with data protection laws.

4.2 If you have any concerns or questions about our use of your personal data you can contact our Data Protection Officer by writing to The Data Protection Officer, Catalyst Housing, Ealing Gateway, 26–30 Uxbridge Road, London W5 2AU or by emailing: [data.protection@chg.org.uk](mailto:data.protection@chg.org.uk)

#### **5 Why are we collecting your information?**

5.1 The information that you provide to us will be used:

5.1.1 to determine your application relating to a tenancy/lease; and/or

5.1.2 to provide services to you under the agreement we have entered into, or are proposing to enter into, with you; and/or

5.1.3 to provide support services at your request.

5.2 Without this information, we may not be able to enter into an agreement with you or provide the services you want.

#### **6 Types of personal information we use**

6.1 We are collecting information about you which is relevant to the above uses. This includes the following information:

6.1.1 **personal details** (such as name, date of birth, gender and marital status);

6.1.2 **contact details** (such as your address, personal telephone number and personal email address);

6.1.3 **confirmation of your identity** (such as photographs and a copy of your driving licence);

- 6.1.4 **grievance and complaints information** (such as reports about anti-social behaviour and complaints made by or against neighbours);
- 6.1.5 **information about your family and others** (such as dependants, other people living with you, next of kin and emergency contact numbers);
- 6.1.6 **information about your needs** (such as whether you have a carer or social worker, whether you need adaptations to your home and if you need large print or translated text)
- 6.1.7 **financial and transaction information** (such as bank details, payments made to us and any money owed to us);
- 6.1.8 **information about your previous housing circumstances** (such as previous addresses);
- 6.1.9 **employment status** (including information about any changes to your employment status);
- 6.1.10 **recordings of telephone conversations** made to our switchboard or contact centre;
- 6.1.11 **security information** (such as CCTV footage);
- 6.1.12 **information you provide to us when accessing our optional support services** (including employment and training support, energy saving programmes and financial inclusion (such as your employment status, salary and financial situation)); and
- 6.1.13 **responses to surveys and feedback requests** (this information will be held anonymously unless you consent otherwise).

### ***Special categories of personal data***

- 6.2 Some of the information which we collect may be special categories of personal data (also called sensitive personal data). Special categories of personal data require a higher level of protection. The special categories of personal data about you which we may collect include:
  - 6.2.1 information about your **race or ethnicity, religion and sexual orientation**;
  - 6.2.2 information about your **health**, including any medical condition or disability; and

6.2.3 information about **criminal convictions and offences**.

## 7 Source of your personal information

7.1 The above information which we collect about you will be obtained through a variety of sources which include:

7.1.1 from you directly as part of an application process, on enquiry forms, communications with you, information provided when entering into an agreement or for any other related reason; and

7.1.2 from third parties (such as your relatives, officers in the local authority/ social services department, health professionals, as well as where we carry out identity verification credit or anti-fraud checks against your name using third party databases).

## 8 How and why we use your personal data

8.1 We use the types of personal data listed above for a number of purposes, each of which has a "lawful basis". In accordance with the data protection laws, we need a "lawful basis" for collecting and using information about you. There are a variety of different lawful bases for using personal data which are set out in the data protection laws.

8.2 We have set out below the different purposes for which we collect and use your personal data, along with the lawful bases we rely on to do so.

Why we use your information	Our lawful basis for using your information
To <b>assess your eligibility</b> for the tenancy/lease (or other agreement) you have applied for/requested.	<b>Contract:</b> It is necessary in order to take steps to enter into a contract with you. <b>Legal obligations:</b> It is necessary to meet legal / regulatory obligations. <b>Social protection:</b> It is necessary in our role as an affordable housing provider.*
To <b>enter into an agreement with you</b> , such as a tenancy, lease or other agreement.	<b>Contract:</b> It is necessary in order to take steps to enter into a contract with you.

<p>To consider whether we need to provide appropriate <b>disability adjustments</b> to a property.</p>	<p><b>Contract:</b> It is necessary in order to take steps to enter into a contract with you.</p> <p><b>Legal obligations:</b> It is necessary to meet legal / regulatory obligations.</p> <p><b>Social protection:</b> It is necessary in our role as an affordable housing provider.*</p>
<p>To <b>provide services under our agreement</b> with you, such as property repairs and maintenance.</p>	<p><b>Contract:</b> It is to perform our contract with you.</p> <p><b>Social protection:</b> It is necessary in our role as an affordable housing provider.*</p>
<p>To ensure that the <b>support and services</b> provided to you are adequate and tailored to your needs.</p>	<p><b>Contract:</b> It is to perform our contract with you.</p> <p><b>Legitimate interests:</b> It is necessary in our legitimate commercial interests (and your interests and fundamental rights do not override those interests).</p> <p><b>Social protection:</b> It is necessary in our role as an affordable housing provider.*</p>
<p>To <b>communicate with you</b> in the most appropriate way (for example, by providing documents in large print or an alternative language).</p>	<p><b>Contract:</b> It is necessary to perform our contract with you.</p> <p><b>Social protection:</b> It is necessary in our role as an affordable housing provider.*</p>
<p>To <b>adequately deal with your requests, appropriately manage any services we provide to you and handle any complaints</b> you make.</p>	<p><b>Contract:</b> It is to perform our contract with you.</p> <p><b>Social protection:</b> It is necessary in our role as an affordable housing provider.*</p> <p><b>Explicit consent:</b> Where we are relying on your explicit consent.*</p>

<p>To provide you with <b>advice and/or support</b> where you have accessed our optional support services.</p>	<p><b>Explicit consent:</b> Where we are relying on your explicit consent.*</p>
<p>For <b>training and monitoring purposes</b> such as through the recordings of telephone calls with our call centre handlers.</p>	<p><b>Legitimate interests:</b> It is necessary in our legitimate commercial interests (and your interests and fundamental rights do not override those interests).</p>
<p>To comply with our <b>legal obligations</b> such as in the prevention, detection and investigation of fraud and corruption.</p>	<p><b>Legal obligations:</b> It is necessary to meet legal / regulatory obligations.</p> <p><b>Social protection:</b> It is necessary in our role as an affordable housing provider.*</p> <p><b>Legal claims:</b> It is necessary for the establishment, exercise or defence of legal claims.*</p>
<p>To conduct <b>surveys, feedback requests and other research</b> to help improve our services (this information will be held anonymously unless you consent otherwise).</p>	<p><b>Legitimate interests:</b> It is necessary in our legitimate commercial interests (and your interests and fundamental rights do not override those interests).</p> <p><b>Explicit consent:</b> Where we are relying on your explicit consent.*</p>
<p>To <b>manage anti-social behaviour and to protect the health and safety</b> of our employees, tenants, leaseholders, customers and members of the public.</p>	<p><b>Legal obligations:</b> It is necessary to meet legal / regulatory obligations.</p> <p><b>Social protection:</b> It is necessary in our role as an affordable housing provider.*</p> <p><b>Legal claims:</b> It is necessary for the establishment, exercise or defence of legal claims.*</p>

<p>We may need to capture images of you as part of our <b>security processes</b> such as use of CCTV footage.</p>	<p><b>Legitimate interests:</b> It is necessary in our legitimate commercial interests (and your interests and fundamental rights do not override those interests).</p> <p><b>Public information:</b> Where the information is public (e.g. where a disability, your race/ethnicity or religious beliefs are clear from your appearance in CCTV footage)*</p>
<p>* This is an additional lawful basis which we need to rely on in order to use special categories of data such as information about your health</p>	

## 9 What may happen if you do not provide your personal information?

- 9.1 If you refuse to provide certain information when requested, we may not be able to enter into an agreement with you, or we may be prevented from complying with our legal obligations (such as the requirement to ensure the safety of our tenants).

## 10 Complying with data protection law

- 10.1 We will comply with data protection law. At the heart of data protection laws are the "data protection principles" which say that the personal information we hold about you must be:
- 10.1.1 used lawfully, fairly and in a transparent way;
  - 10.1.2 collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
  - 10.1.3 relevant to the purposes we have told you about and limited only to those purposes;
  - 10.1.4 accurate and kept up to date;
  - 10.1.5 kept only as long as necessary for the purposes we have told you about; and
  - 10.1.6 kept securely.

## 11 Sharing your information



- 11.1 We will share your personal information with third parties where we have a lawful basis for doing so.
- 11.2 The types of organisations with whom we share your personal data are as follows:
  - 11.2.1 utility companies so they can provide services to you and contact you in respect of utility charges;
  - 11.2.2 repairs and maintenance contractors;
  - 11.2.3 IT service provider;
  - 11.2.4 regulators and other organisations where we have a lawful obligation to disclose information (such as HMRC and local authorities in relation to council tax);
  - 11.2.5 the police and other law enforcement agencies for the purpose of detection and prevention of crime;
  - 11.2.6 local authorities and safeguarding authorities;
  - 11.2.7 with organisations with a function of auditing and / or administering public funds for the purpose of detection and prevention of fraud;
  - 11.2.8 legal and other professional advisors;
  - 11.2.9 courts and other parties in court proceedings;
  - 11.2.10 charitable organisations, such as organisations that can help to support you, with your consent;
  - 11.2.11 subsidiaries and other entities in the Catalyst or Aldwyck group, as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data; and
  - 11.2.12 third parties in the context of the possible sale or transfer of services in which you are involved.

## **12 Transferring your information abroad**

- 12.1 We will not transfer your information outside of the European Economic Area.

### **13 Security of your information**

- 13.1 We have put in place measures to protect the security of your information. Details of these measures are available upon request.
- 13.2 All our third party service providers, subsidiaries and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.
- 13.3 We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

### **14 Can we use your information for any other purpose?**

- 14.1 We typically will only use your personal information for the purposes for which we collect it. It is possible that we will use your information for other purposes as long as those other purposes are compatible with those set out in this policy. If we intend to do so, we will provide you with information relating to that other purpose before using it for the new purpose.
- 14.2 We may use your personal information without your knowledge or consent where such use is required or permitted by law.

### **15 Storing your information and deleting it**

- 15.1 We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for.
- 15.2 To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

- 15.3 If your application for a tenancy/lease is unsuccessful we will retain your personal information for a period of 6 months, after we have communicated to you our decision.
- 15.4 If your application for a tenancy/lease is successful, we shall retain your personal data in line with our data retention schedule, which you can request from us by contacting our Data Protection Officer by writing to The Data Protection Officer, Catalyst Housing, Ealing Gateway, 26–30 Uxbridge Road, London W5 2AU or emailing [data.protection@chg.org.uk](mailto:data.protection@chg.org.uk).

## 16 Your rights

- 16.1 Under certain circumstances, by law you have the right to:
- 16.1.1 **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
  - 16.1.2 **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
  - 16.1.3 **Request erasure** of your personal information in certain circumstances. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
  - 16.1.4 **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) or public interest as our lawful basis for processing and there is something about your particular situation which leads you to object to processing on this ground. You also have the right to object if we are processing your personal information for direct marketing purposes.
  - 16.1.5 **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
  - 16.1.6 **Request the transfer** of your personal information to another party in certain circumstances.

16.2 If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact our Data Protection Officer by writing to The Data Protection Officer, Catalyst Housing, Ealing Gateway, 26–30 Uxbridge Road, London W5 2AU or emailing [data.protection@chg.org.uk](mailto:data.protection@chg.org.uk).

## **17 Right to withdraw consent**

17.1 In the circumstances where we are relying on your consent as our lawful basis to process your data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.

17.2 Where we are relying on your consent to process your data, to withdraw your consent please contact our Data Protection Officer by writing to The Data Protection Officer, Catalyst Housing, Ealing Gateway, 26–30 Uxbridge Road, London W5 2AU or emailing [data.protection@chg.org.uk](mailto:data.protection@chg.org.uk).

17.3 Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

## **18 Automated decision making**

18.1 You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

## **19 Right to complain to the ICO**

19.1 You also have the right to complain to the Information Commissioner's Office (the "ICO") if you are not satisfied with the way we use your information. You can contact the ICO by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

## **20 Changes to this privacy statement**

20.1 We reserve the right to update this privacy statement at any time, and we will provide you with a new privacy statement when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.