

What is the purpose of a Privacy Notice?

In order to deliver our services, Elim needs to gather personal data from its residents, service users, and those applying for housing. This makes us a *Data Controller*.

Elim respect your privacy and are committed to protecting your personal data. This Privacy Notice gives you information about the personal data, including sensitive personal data, we collect, why we collect it and how we look after it. It will give you information about your rights and explain what you can do if you have any questions or concerns.

Although this notice is geared towards residents of Elim homes, the notice is also applicable to any other individual who provides personal data to Elim, e.g. a member of staff or a job applicant.

Who we are

Elim is a provider of social, supported and other types of housing, registered with Homes England. Our normal activities are:

- Providing social and other types of housing
- Delivering housing related support services
- Property and grounds maintenance and repair
- Managing tenancy, license or leases as a landlord
- Developing new housing

Elim has a profit-making subsidiary, Lime Property Ventures.

Our Head Office address is Elim Housing, Units 3 & 4 Pinkers Court, Briarlands Office Park, Gloucester Road, Rudgey, BS35 3QH, our telephone number is 01454 411172 and our email address is info@elimhousing.co.uk.

We are a Data Controller, registered with the Information Commissioners Office. Our registration number is Z7302750.

What is personal data?

Personal data is data relating to any individual that can be used to identify that individual, for example:

- Names
- Dates of birth
- Address
- Contact information, such as telephone numbers or emails
- Your image, e.g. when captured on CCTV
- Your National Insurance number

What is special category data?

Special category data is particularly sensitive personal data that are subject to additional protections in how they can be gathered and used. Special category data includes information relating to a person's:

- Ethnic or racial origins
- Political opinions or trade union membership

- Finances
- Sex life
- Philosophical or religious beliefs

Why do Elim collect personal data?

Elim collect personal data to carry out the normal activities detailed above. When we collect personal data, we do so under specific legal bases. The table below details our most common legal bases for processing personal data and gives examples of how we might use them in carrying out our activities. The table is not exhaustive. For more detail about the legal bases for processing personal data you can go to the website of the Information Commissioner's Office at www.ico.org.uk or enter 'ICO legal basis for processing' into Google or another search engine. The website also includes information about the bases for the processing of sensitive personal data.

We will only use your personal data for the purposes for which we collected it, unless we reasonably believe that we are using it for another legal basis.

Legal Basis for processing	Explanation	Activity examples
Contract	We need to process your personal data in order to deliver a contract we have with you.	<ul style="list-style-type: none"> • Our tenancy or license agreements are contracts, so this would cover any activity detailed in these documents, e.g. arranging repairs, contacting you to discuss your rent account. • To provide support as outlined in a support plan agreed by you. • To collect and recover money owed to us.
Legitimate Interests	We are processing personal data in order to pursue 'legitimate interests'. In our case, the provision, management and maintenance of properties and support services.	<ul style="list-style-type: none"> • Any processing that takes place as part of our normal activities. • <i>Please note that Legitimate Interests can not be given as the sole basis for processing sensitive personal data.</i> • <i>In using the Legitimate Interests basis, we will assess whether the interest is overridden by your personal interests, rights or freedoms</i>
Consent	You have given us explicit consent to process your personal data.	<ul style="list-style-type: none"> • Sharing your rent account information with Experian when you have explicitly consented to this. • Sharing information with 3rd parties in order to progress an action detailed in your support plan.
Vital Interests	We process your data to protect your vital interests, e.g. your life	<ul style="list-style-type: none"> • If we have serious concerns about your wellbeing, we might contact the Police, providing information such as your name or address.

How do Elim collect personal data?

We collect personal data in a variety of ways:

- Directly from the data subject, e.g. if you give us financial information as part of an affordability test, if you provide personal information for completion of a support plan, or when an applicant for a job with us submits their application.
- From a third party, e.g. when you apply for one of our properties through a local authority's Choice Based Lettings or Home Choice scheme.

- Digital technologies or interactions, e.g. your activity on our website may be monitored. Our website will provide you information about the gathering of cookies and similar technologies when you arrive there.
- Through CCTV footage

Who do Elim share my personal data with?

In the course of carrying out our activities, we may need to share your data with third parties. This will always be done under a legal basis for processing. Most commonly, the legal basis used is that we need to share your information in order to deliver to you a service as part of our contract with you, e.g. providing your name and address to a contractor who carries out repairs for us. We always take steps to ensure:

- That we only provide personal data necessary for the activity to be carried out.
- That the third party only uses the data provided for the purpose for which it was intended.
- That the third parties we provide your information to respect the security of your personal data and are compliant with data protection regulations.

Third parties that we might expect to share information with include:

- Local authorities
- Benefit agencies
- Sub-contractors who we pay to deliver part of our service, e.g. companies providing a maintenance service
- Support agencies involved in providing a support plan
- Your potential future housing providers

What about my children?

We will ask for basic information about children in households, however we would not process this information as part of our normal activities. Knowing the number and age of children in a household helps us to monitor occupancy of a property and can improve any advice we might offer.

What are my rights?

Under data protection laws, you have rights in relation to the data you choose to provide and how you want us to process it. The rights include (but are not restricted to):

The right to not provide your personal data

You do not have to provide your personal data if you would rather not. In some cases however, not providing personal data may mean we are unable to provide a service, e.g. we can not provide you with a tenancy agreement without your name. In other cases, failure to provide personal data may mean that we are not able to provide a service to the standard we would choose to, e.g. information about a person's health or disability helps us to make sure that specific needs are taken into account when arranging visits or repairs.

If you are unsure why we might need specific personal data then please ask the member of staff you are dealing with and they will be able to explain.

The right to request access to your personal data that Elim hold

This is known as a 'data subject access request.' You can make a subject access request by contacting the relevant member of staff. We will sometimes ask you to confirm the request in writing, though this will not always be necessary. We will provide you the information in writing within one calendar month of the request being received, though in most cases we would hope that we can do it much more quickly.

The right to be informed about how we use your personal data

You have the right to know about how we are using your personal data and the grounds for that usage. We will provide this information through the same process as a data subject access request.

The right to request correction to your personal data that Elim hold

It is helpful for everybody if the data that we hold is accurate. You can have any incomplete or incorrect personal data that we hold corrected by speaking to a member of staff, though we may need to verify the accuracy of the new data that you provide to us.

The right to request erasure of your personal data

You can ask us to delete your personal data if you feel that there is not good reason for us to continue to hold it. You may be asked to put your request in writing. On certain occasions we may not be able to act on your request for legal reasons but we will always explain these reasons clearly to you.

The right to withdraw consent

Where we are processing your data on the basis of consent, you can withdraw this consent at any time, though doing so could affect the service we are providing to you.

How long will Elim keep my data for?

In the majority of circumstances, we will erase or destroy personal data once it has fulfilled the purpose for which it is gathered, e.g. information gathered when determining who to allocate a property to will be erased/destroyed once the property has been allocated.

Certain personal data may need to be kept for longer for legal or other reasons, e.g. we keep tenancy agreements permanently, even after the tenancy has ended. For more detailed information on how long we retain personal data for, see our Retention Guidelines.

Where can I go for more information?

At all times, Elim will have a named Data Protection Officer. At present, the postholder is Dave Peregrine, Head of Support Services. Dave can be contacted at Head Office, by phone on 01454 411172 or by email at info@elimhousing.co.uk.

Below is a list of related documents that provide more information about Elim's data protection. These are either available on our website or by request to the email address above.

The Information Commissioner's Office has a website with extensive information - www.ico.org.uk – and can be contacted on 0303 1231113.

If you wish to make a complaint, then you can use Elim's complaints procedure or, if you think that we are in breach of any data protection regulations, you can complain directly to the ICO.

