

## Privacy Policy

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### 1. Introduction

1.1 Flint Housing Limited is the 'controller' of the information ('personal data') that we collect about you, our 'data subjects', which means we are responsible for how your data is processed. The word 'process' covers what can be done with personal data, including collection, storage, use, sharing and deletion. This privacy policy explains why and how we process your personal data, and explains the rights you have, including amongst others, the right to access your data or to object to the way it is processed. Please see the section on 'Your rights as a data subject' for more details on your rights and how to exercise them.

### 2. Summary

2.1 **Why?** The main reason we need to process your data is so that we can offer you the best service available whether you are a customer, colleague or anyone else that we work with.

2.2 **What?** We use your contact details, financial information and other personal information relating to our interactions with you to provide you with our services. This includes handling enquiries and complaints, and working to improve our services, which sometimes involves sharing data with our trusted partners such as local authorities and other housing providers, contractors and the authorities, if required.

2.3 **How?** We handle your data carefully and have appropriate controls in place to protect it from breaches. We also work to ensure that data is accurate, only kept as long as is necessary and that we uphold your rights around how we handle your data.

### 3. Contact Us

3.1 Our address is included below:

- Address: Flint Housing Limited, 3 Bunhill Row, London, England, EC1Y 8YZ

3.2 If you have any queries about this policy or anything related to data protection, you can contact us by e mail: [privacy@flint-housing.co.uk](mailto:privacy@flint-housing.co.uk)

### 4. Personal data

4.1 'Personal data' is any information that relates to a living, identifiable person. This will usually include your name, address, contact details, and other information we collect as part of our relationship with you.

4.2 It can also include 'special categories' of data, which is the official term for information about a person's race or ethnic origin, religious, political or other beliefs, physical or mental health, trade union membership, genetic or biometric data, sex life or sexual orientation.

4.3 The use of this type of data, and of information about criminal convictions and offences, is subject to strict legal controls.

4.4 We only process data if we need to for a specific purpose, as explained below. Most often, we collect your personal data directly from you, through our contact with you. Sometimes we will obtain data about you from other sources, such as when you are given a reference, if your details are provided as an emergency contact for someone else, or when we work with local authorities, other housing providers or the police or other authorities to carry out tasks in the public interest, including looking after the safety and wellbeing of individuals and communities.

## **5. How we store your data**

5.1 Your personal data is held in both hard copy and electronic formats.

5.2 Electronic data, including emails, is stored on Flint Housing servers and on our software suppliers' servers. We have appropriate data transfer mechanisms and safeguards in place to the extent required by applicable data protection laws, including for circumstances where personal data may be required to be transferred outside your home jurisdiction.

## **6. How long we keep your data**

6.1 Some of our retention periods are based on legal requirements, and others are based on the practical reasons we need to keep the data for a certain period of time. Information about how long we hold your data for can be found in our Data Retention Schedule, which can be requested from us.

6.2 Once we reach the end of the retention period, we will securely delete all relevant data, unless:

- we are legally required to keep it longer, or
- there are lawful reasons why we need to keep it longer such as in the context of litigation, investigations and/or proceedings.

## **7. Your rights as a data subject**

7.1 As a data subject, to the extent provided by applicable law and subject to exemptions thereunder, you have the following rights in relation to your personal data:

- be informed about how and why your personal data is processed, including the information we provide through this Privacy Notice
- ask for copies of the personal data we hold about you, which is sometimes known as making a Data Subject Access Request, or DSAR or SAR;
- ask for any errors or inaccuracies in your personal data to be corrected;
- ask to have some, or all, of your personal data erased (also known as the right to be forgotten) and we will erase your data on request where we have no lawful reason for retaining it;
- ask us to restrict our processing of your personal data, in some circumstances, which means you can ask us to stop using it but not erase it;
- object to your personal data being processed in some circumstances (see below for more details);

- have personal data that you have provided to us provided back to you in a format which can easily be transferred to another party, where the data is being processed based on your consent or for a contract, and is being processed by electronic means;
- the right not to be subjected to a fully automated decision-making process (i.e. a system generated decision without any human input), where the outcome has a legal or similarly significant effect on you
- If you wish to exercise any of these rights, please contact us in your preferred way, either in writing (including email) or verbally.

7.2 For more information about these rights, please contact us at Flint Housing Limited, 3 Bunhill Row, London, England, EC1Y 8YZ or by e mail: [privacy@flint-housing.co.uk](mailto:privacy@flint-housing.co.uk).

7.3 You can also find information about your rights on the ICO's website: <https://ico.org.uk/>

## **8. Your right to object to processing**

8.1 You have the right to object to the processing of your personal data when the purpose of the processing is to deliver direct marketing to you. We will always stop the processing as soon as possible.

8.2 You have the right to object where the legal basis for the processing is that it is necessary for a task in the public interest or the exercise of official authority, or if the processing is necessary for our legitimate interests or another party's legitimate interests.

8.3 If you object to processing for these purposes, we will ask you for your specific reasons for objecting which should be based upon your particular situation. In these cases, we will carefully consider your objection and let you know if we are going to fulfil your request.

8.4 Please be aware that we can refuse a request if we can demonstrate compelling legitimate reasons for the processing, which, on balance, override your interests, rights and freedoms, or if the processing is for the establishment, exercise or defence of legal claims.

## **9. Withdrawing consent**

9.1 If we are relying on your consent to process your data, you may withdraw your consent at any time by contacting us in writing in your preferred way.

## **10. Complaints**

10.1 Please let us know if you have any complaints about the way your personal data has been handled.

10.2 You also have a right to complain to the Information Commissioner's Office (ICO) about the way in which we process your personal data. You can make a complaint on the ICO's website <https://ico.org.uk/>

## **11. Your data and how and why we process it**

11.1 Flint Housing processes your personal data so we can manage and support our relationship with you, comply with legal obligations, improve our services and achieve our legitimate business aims. Your personal data is held in both hard copy and electronic formats. The information below gives more details about the ways we process your personal data, including who we share data with, and the legal basis for each type of processing.

11.2 Electronic data, including emails, is stored on Flint Housing servers and on our software suppliers' servers. We have appropriate data transfer mechanisms and safeguards in place to the extent required by applicable data protection laws, including for circumstances where personal data may be required to be transferred outside your home jurisdiction

## **12. Legal basis for processing**

11.3 We often have more than one main legal bases for processing personal data. Firstly, where it is necessary for the purposes of the legitimate interests pursued by Flint Housing or by a third party to process your information. We can do that so long as we do not interfere with your fundamental rights or freedoms. Secondly, because we have your consent (i.e. agreement) to us processing your personal information. Under the UK GDPR, consent is a legal basis for processing personal information.

11.4 Thirdly, an obligation under a contract to process/disclose the information where you are a party to the contract, i.e. your tenancy agreement.

11.5 The other reasons we can rely upon to process your personal information under UK GDPR is where we need to protect the vital interests (i.e., the health and safety) of you or another person or because it is necessary to process the personal information to comply with a legal obligation.

11.6 The legal basis for processing special categories of personal information is more limited. To lawfully process special categories of personal data, we must identify a lawful basis for the processing and meet a separate condition for the processing. The conditions we can use are:

- With your consent;
- Where we need to protect the vital interests (i.e. the health and safety) of you or another person and you are incapable of giving consent;
- Where you have already made your personal information public;
- Where processing is necessary for the purposes of carrying out the obligations and exercising specific rights in the field of employment and social security and social protection law
- Where we or another person needs to bring or defend legal claims; and/or
- Substantial public interest grounds.

11.7 To process personal data about criminal convictions or offences, we must have both a lawful basis for the processing and either legal authority or official authority for the processing.

## Purpose for processing

## Reason for processing

### Applications for rented properties

When you apply to live in a Flint Housing home, we collect information directly from you and from relevant third parties, about you and your household, in order to assess your eligibility and suitability for the application you have made. We receive your contact details and housing need information from the Local Authority if you have been nominated by them and we take up references from former landlords. Some decisions may be made automatically about your eligibility, based on the answers you provide in your application, but you will always be given the opportunity to challenge the decision.

This processing is necessary for being considered for, and for signing up to, a tenancy agreement, which means entering into a contract with us. We need to know that you are eligible, and that you can afford the property, and/or sustain your tenancy and we may need to offer you additional support as part of your tenancy. If you provide us with special categories of data, such as health, in your housing application, we will process this data only as far as it is necessary for us to manage your application and ensure you are housed appropriately and safely, in line with our legal and statutory obligations as a housing provider and employer. In some cases, we will process information about criminal offences and convictions, where it is necessary to do so in order to protect the safety and wellbeing of individuals and our communities. When we ask for information about race/ethnic origin, religion, health, or sexual orientation, this is where it is necessary for us to monitor and improve equality of opportunity and treatment, in the substantial public interest, and it is optional for you to provide this information.

### Shared ownership applications and sales

When you apply to purchase a share of a Flint Housing home, we collect information directly from you and from relevant third parties, about you and your household, in order to assess your eligibility and suitability for the application you have made. We, and relevant third parties, will communicate with your solicitor and mortgage provider to facilitate the purchase.

This processing is necessary for entering into a purchase agreement with us. We need to know that you are eligible and can afford the property. In some cases, we will process information about criminal offences and convictions, where it is necessary to do so in order to protect the safety and wellbeing of individuals and our communities. When we ask for information about race/ethnic origin, religion, health, or sexual orientation, this is where it is necessary for us to monitor and improve equality of opportunity and treatment, in the substantial public interest, and it is optional for you to provide this information.

### CORE reporting

So that the Ministry of Housing, Communities and Local Government (MHCLG) can produce statistical information, we report information to them about our lettings and shared ownership sales via the CORE (Continuous Recording) system. The information provided does not include your name or full address, but it does contain special categories of data.

The processing of this information by the MHCLG is necessary for the performance of a task in the public interest and so far as the data includes special categories, the MHCLG states that the processing is necessary for reasons of substantial public interest. The data is used to compile statistics on the use of social housing, including reviewing equality of opportunity and treatment. Please see the CORE website for more details (<https://core.communities.gov.uk/>).

### Flint Housing customers

When you are a Flint Housing customer, we, or our housing management partners, will collect information from our interactions with you, including any complaints or allegations that are made by you, or about you, and we process this information to allow us to manage our relationship with you, collect your rent, and provide you with tenancy or sales related services appropriate support services and to manage any complaints or alleged ASB or similar issues. This

Most of the information we collect and use as part of our ongoing interactions with you is necessary for the performance of your contract and is linked to ensuring both you and Flint Housing are complying with the requirements of the contract. We have a legal obligation to keep business and financial transaction records as appropriate. We will offer you further support based on both our and your legitimate interests to enable you to sustain your relationship (tenancy/shared ownership relationship) with us to the best of your ability. If we contact you by email or text to let you know about our services, we will do so based on either our legitimate interests of keeping you updated about the services you receive

### Purpose for processing

will involve sharing information with, and receiving information from, third parties, as explained below. Where crimes have been committed or alleged, we share information with the police and other agencies with investigative and prosecution powers. Where we have concerns about anyone requiring safeguarding for any reason or requiring protection from financial abuse due to a mental or physical health issue, we share information with the relevant authorities in order to help the people concerned.

### Reason for processing

from Flint Housing, or based on your consent where we are contacting you about new services. If we refer you to an external agency for further support, we will do so only with your consent to pass your details on to them, unless we believe there is an overriding lawful basis for the referral without your consent. When we share information for the reasons explained, we will do so on the basis of the fact it is necessary to protect individuals and communities, is for a task in the public interest (crime, benefits and tax payment) or for the legitimate interests of debt collection.

### Our support services

Flint Housing may, through collaboration with our housing manager partners or other third parties, provide support to people who need it, through specialist services, for example help with money management, getting back into work, or more general day to day support.

We process your data as part of providing this support on the basis of our contract with you, where it is tenancy-linked support, or on the basis of it being necessary for complying with our legal obligations or carrying out a task in the public interest. Where we process special categories of data, or criminal information, about you as part of providing this support, we do this where it is necessary to protect individuals in line with our legal and statutory obligations as an employer and as a housing provider. Where this (or another) basis is not appropriate, we will ask for your consent.

### Emergency situations

Unfortunately, there will always be emergency situations that negatively impact on our customers, employees and wider communities, and we will respond as appropriate and as quickly as possible in order to protect people and property. Whether we are responding to fire, flood, crime, safeguarding issues, pandemic, or any other emergency situation, Flint Housing will treat people's health and wellbeing as a priority, which we acknowledge includes protecting personal data and ensuring it is handled lawfully and securely.

Processing of data in the immediate response to emergency situations is done only where it is necessary to protect individuals and communities, on the basis that we are acting under employment or social protection law, or in the public interest / substantial public interest.

### Equality of treatment & opportunity

Flint Housing is dedicated to treating everyone fairly and providing equal opportunities, regardless of differences in race or ethnic origins, religious or philosophical beliefs, physical or mental health or sexual orientation. In order to monitor and improve performance in this area, we collect information about race, beliefs, health and sexual orientation from customers and employees, if you are happy to provide this information.

The processing of these special categories of data is necessary for a task which is in the substantial public interest, specifically for the purposes of identifying and monitoring equality of opportunity and treatment between different groups of people, with a view to enabling equality to be promoted or maintained.

## Purpose for processing

## Reason for processing

### Sharing your data with our 'Processors'

When Flint Housing uses other companies to supply goods or services on our behalf, sometimes we need to share relevant information with those suppliers and contractors so they can carry out that work. They are known as our 'Processors' and are legally bound by contract to act only on our instructions regarding your personal data, and not use it for their own purposes. In particular, Pinnacle Housing Limited provide on-boarding services, housing management services and housing repair and maintenance services and act as our Processor. We regularly share your personal data with them and will share your personal data with any future management provider.

The relevant legal basis for each Processor we use will be dependent on the type of work they are carrying out for us, and our legal basis for undertaking the processing that is linked to that work. For example, we carry out emergency repairs work on the basis of our contract with you, and in some circumstances the repairs may be contracted out to contractors who need your address etc. in order to carry out the repair. This makes the contractor our Processor. The contracts we use with Processors comply with Article 28 of the General Data Protection Regulation (GDPR), which rules how Processors are appointed, and sets out their relevant responsibilities.

### Sharing your data with other contractors

Sometimes, we share personal data with suppliers, contractors or consultants where they process the data on the basis of their own knowledge and expertise, not just acting on our instructions. For example, solicitors, sales agents and housing management partners. In these cases they are not our Processors, but instead are Data 'Controllers' in their own right.

As Data Controllers these organisations have their own legal obligations and responsibilities to handle your data lawfully and safely and are also bound by contract to comply with their data protection obligations. We share information with contractors etc. who are Controllers only when it is necessary for us to carry out our tasks in the public interest, to carry out our legal obligations, or for our legitimate interests of outsourcing the provision of some services and of providing appropriate support, to enable us to run the business efficiently. We do not share your data with any Controllers that we are not confident will protect your data, and therefore we protect your rights, freedoms and interests.

### Insurance

We may be required to process your information in connection with arranging or maintaining buildings insurance for our properties and so we can provide you with a buildings insurance policy and to manage any claims made, which may involve sharing information with third parties about the circumstances in order to assess the claims.

This processing is necessary for the performance of the insurance contract. If it is suspected that a claim is not legitimate, we will process information to protect our business from fraudulent claims, which breach the insurance contract.

### Complaints

In order to investigate and respond to complaints or allegations against Flint Housing or an employee or customer of Flint Housing, or complaints and allegations made about neighbours, or any other topic, we will usually require contact details and information about the complaint from you or your representative. We will request the minimum amount of information from you, and only use it for the purposes of the investigation.

Customer complaint related processing is done on the basis of it being necessary for us complying with the terms of your contract with us. For complaints from non-customers, depending on the nature of the complaint, the processing is necessary for our legitimate interests.. If special categories of data are processed (including health, race, religion, sexual orientation) it is on the basis of being necessary for defending a legal claim or for acting in the substantial public interest. This includes responding to elected representatives such as MPs, who have raised a matter on your behalf.

### General contacts

Purpose for processing	Reason for processing
<p>For members of the public who are not customers but come into contact with Flint Housing in another way, such as to make an enquiry, we will collect information from our interactions with you, so that we can provide you with the information you have requested.</p>	<p>We process this information on the basis that it is necessary for our legitimate interests of responding to your enquiry, complaint or allegation, as appropriate. If we need to process any special categories of data in order to handle the issue, we do so with your explicit consent, or on the basis of it being necessary for a task in the substantial public interest, such as reviewing equality of opportunity and treatment.</p>
Business contacts	
<p>Contact details for people, organisations and companies we work with is personal data and we treat it accordingly. We will use it only as part of our relationship with your organisation, whether we work in partnership or have a customer/supplier relationship.</p>	<p>This processing is based on our legitimate interests of managing business relationships appropriately. We use the data only for the purposes explained, keep the data secure and safe, and protect your rights, freedoms and interests.</p>
Surveys and feedback	
<p>In order to understand our customers' experiences and improve our services and products, we will contact you at various "touch-points" during our relationship with you and ask you to complete a survey and give us feedback, by email, text or over the telephone. We contract with specialist companies to carry out surveys on behalf of Flint Housing, which involves sending them your contact details and they gather your responses for us. You can opt out of this sort of contact if you prefer.</p>	<p>Flint Housing, and the specialist companies we work with, process data in order to ask for your feedback, based on our legitimate interests of improving our customer services and products.</p>
Marketing	
<p>We will send you information that we think will be useful or of interest to you about the services we provide, whether they are paid for services or free of charge. We will sometimes make decisions about what information to send based on your profile, for example your age if we are letting people know about age-related services.</p>	<p>Flint Housing will send you hard copy marketing materials on the basis of our legitimate interests of increasing our customers' knowledge of other relevant services and products. We will only send you emails or texts (electronic direct marketing) with this type of information if we have your consent to do so. For commercial services or products, which includes where you have bought, or entered into negotiations with us, for a similar service or product, this is regarded by the law as implied consent. However, every time we send an email or text you will have the option to unsubscribe from similar marketing messages.</p>
Exercising of Data Protection Rights	
<p>If you approach us about exercising any of your Data Protection rights, such as accessing copies of your data, or objecting to the way your data is being processed, we need to obtain relevant information from you in order to identify that you are the data subject in question, or acting on their authority. When we fulfil requests such as these, specialist staff members will review the documents in question in order to fulfil the request lawfully, which will include redacting</p>	<p>This processing is carried out as necessary for us to carry out our legal obligations of upholding your Data Protection rights.</p>

Purpose for processing	Reason for processing
information about third parties. The information processed to check your identity and to fulfil your request is only used for these purposes and is kept securely.	
<b>Recruitment</b>	
If you apply for a job with Flint Housing, we collect information about your suitability either directly or via our trusted recruitment partner organisations.	Most of this processing is on the basis that it is necessary for an employment contract, or entering into an employment contract, with Flint Housing.
<b>Employees</b>	
We collect and process information about current and former employees as part of managing your relationship with Flint Housing.	Most of this processing is on the basis that it is necessary for managing your employment contract with Flint Housing, and for us to fulfil our legal obligations under employment law in relation to current and former employees.
<b>CCTV</b>	
Flint Housing may use CCTV in some of our housing/schemes for the safety and security of premises, colleagues, customers and any third parties. CCTV footage can be disclosed to those organisations acting on official authority, including the police.	We process data from CCTV for the purposes of our legitimate interest of protecting our premises, and for carrying out tasks in the public interest/substantial public interest by protecting our people and supporting investigations into crime and fraud, for example.
<b>Telephone calls</b>	
Phone calls to our main telephone number may be recorded so that we can monitor the quality and content of calls.	This processing is on the basis of our legitimate interest of providing good customer service, as well as protecting our colleagues and other people from any problems or issues arising from ambiguity in phone call conversations.
<b>Video conferencing</b>	
Video conferencing can be used as a method of communication for genuine business purposes	Please see privacy information from the relevant video conferencing provider (e.g. MS Teams or Zoom)
<b>Website</b>	
We collect information you submit through our website, and may collect information through the use of Cookies. Please see the Cookies section below for more details.	This information is processed for our legitimate interests of responding to any enquiries you make through our website, and to help us understand and analyse the effectiveness of our website.

### 13. International transfers

We do not transfer your personal data outside the UK.

### 14. Cookies

14.1 **Visiting our Website:** When someone visits our website, we may collect standard internet log information and details of visitor behaviour patterns, using Google analytics. We do this to find out things such as the number of visitors to the various parts of the site. We do not make any attempt to find out the identities of those visiting our websites. We will not associate any data gathered from this site with any personally identifying information from any source. To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>. Most web browsers allow some control of most cookies through the browser settings.

14.2 **What are Cookies:** Cookies are text files placed on your computer by websites you visit. These are widely used to enable the websites to work properly (e.g. ensuring that the right personal information collected is attached to the individual who submitted it) when collecting information that you have provided to the Data Controller. You may delete and block cookies if you wish from this site, however, please be aware that this could affect the functioning of this website. **Accepting cookies:** for this site to function properly you may need to accept cookies. Please bear in mind that if you do not accept cookies, certain personalised features of the website may not be provided to you.

### 15. Review

15.1 This policy will be reviewed every three years – unless legislation, business or sector developments require otherwise – to ensure that it continues to meet the stated objectives and take account of good practice developments.