

## Privacy Notice

### How we use your personal information

#### Identity and contact details of Controller

Salvation Army Homes is a controller of personal information for the purposes of the General Data Protection Regulation ('GDPR')<sup>1</sup>. UK General Data Protection Regulation (UK GDPR) replaced EU GDPR on 31 December 2020. All the main principles, obligations and rights remain in place. The existing EU GDPR will continue to apply unchanged, in the countries of the EEA.

Our contact details for data protection purposes, including data protection complaints, are as follows:

By Post:

Salvation Army Homes  
2<sup>nd</sup> Floor 53-54 Victoria Square  
  
Bolton BL1 1RZ

Telephone: 0800 970 6363

Email: [dpo@salvationarmyhomes.org.uk](mailto:dpo@salvationarmyhomes.org.uk)

The individual responsible for data protection compliance at Salvation Army Homes is Karen Venables, who is contactable using the above contact details.

#### Purpose of this Privacy Notice

This Privacy Notice tells you what to expect when Salvation Army Homes processes personal information. It applies to information about housing applicants, residents, other service users and contractors. It tells you the purposes for which we may process your personal information and the legal basis for the processing ('processing' includes us just keeping your personal information). If you are an employee or applicant for work, please refer to our Employee Privacy Notice and Recruitment Privacy Notice.

#### Why do we collect and store personal information?

Salvation Army Homes needs to collect, process and store personal information about you and other household members (when you provide information about household members we assume that you do so with their full knowledge and consent) in order to operate as a registered provider of housing and deliver efficient and effective services.

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<sup>1</sup> By this we mean the Regulation as supplemented and amended by the Data Protection Act 2018

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## Legal basis for processing

We often have two main legal bases for processing personal data. Firstly, where it is necessary for the purposes of the legitimate interests pursued by Salvation Army Homes 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. Our residents are asked to sign a data protection consent form when they apply to us for housing or later if they did not sign one when they were granted their first tenancy. The consent form sets out the organisations and type of organisations we often have to share personal information about residents with. Under the GDPR, consent is a legal basis for processing personal information. You can withdraw your consent at any time. This is explained further below in the section entitled 'Your rights under GDPR'.

The other reasons we can rely upon to process your personal information under GDPR is as follows:

- Where we are under a legal obligation or an obligation under a contract to process/disclose the information.
- Where we need to protect the vital interests (i.e. the health and safety) of you or another person.

## Special Category Data

- As we are a not-for-profit body, we may be required to process special category data as part of our provision of service to you.
- This personal information is treated as more sensitive (for example information about health, sexuality, ethnic background and others – see footnote below for a full list<sup>2</sup>). The legal basis for processing these 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 basis we can use these are:
  - With your consent;
  - Where we need to protect the vital interests (i.e. the health and safety) of you or another person;
  - Where you have already made your personal information public;
  - Where we or another person needs to bring or defend legal claims; and/or
  - Substantial public interest grounds.

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<sup>2</sup> Special categories of personal data is defined within the GDPR and covers racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a person's sex life or sexual orientation

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- 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.
- We have appropriate technical safeguards in place.

### Children's Personal Data

In some cases, we may collect and use personal data relating to children. When we do so, we will comply with the requirements of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018,

The legal basis for processing children's personal data is where it is necessary for the purposes of the legitimate interests pursued by Salvation Army Homes. Under Article 9 UK GDPR, we will also meet an additional condition for processing.

Where we rely on consent as our additional condition for processing, and the service is one that requires consent to be given by the child or their parent/guardian, we will:

- obtain consent from a person with parental responsibility where the child is under 13 years of age, in accordance with the UK GDPR; and
- make reasonable efforts to verify that the person providing consent holds parental responsibility.

Depending on the nature of our services, we may collect children's personal data relating to:

- basic identification information (e.g., name, age, contact details)
- information provided by a parent or guardian
- educational, safeguarding or welfare information (where relevant)

We only collect information that is necessary for the purposes explained in this notice.

### **Information we may hold about you and how we use it**

The information we hold on our records concerns our relationship with you. For example:

- We hold names & dates of birth, photographic ID and information about your previous housing circumstances to assess housing applications and help prevent tenancy fraud.
- We hold contact details for you so we can communicate with you by your preferred means, and keep you informed about services we offer which may be useful to you.
- We record information about your needs (for example if you have a carer or social worker; if you need adaptations in your home; if you need large print or translated text) to ensure that we take account of any support needs in our dealings with you, and to improve our communications with you.
- We record information to enable us to provide housing management services. For example, we record reports of anti-social behaviour; complaints; change in circumstances (for example when your employment status changes etc.) and

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information about housing options (e.g. if you have a medical need which means you need to move).

- We keep financial records about the amount of money you have paid us; any amount(s) outstanding and action taken to recover money you owe.
- We may hold information about you if you are engaged with any additional guidance and support services. For example, in connection with access to training and employment we may hold information about your job history and skills and experience, or if we support you to improve your financial circumstances, we may hold information about your household income and expenditure.
- We may record your telephone calls to our switchboard for training and monitoring purposes to ensure we are delivering a good service. Any call recordings will be held in accordance with our corporate retention policy before being erased.
- We may capture your image on our CCTV systems if you visit a property, office or community facility. Any CCTV recordings will be held in accordance with our corporate retention policy before being erased.
- We record the findings of surveys, such as the annual Tenant Satisfaction Perception Survey, and other research to help us improve our service to customers. The information you provide will be anonymous unless you agree that we can use your details.

This list is not exhaustive, as we hold records of most contacts we have with you, or about you, and we process this information so we can deliver services to you. Generally the information we hold will have been provided by you (on application or enquiry forms or when we communicate with you), but we may also hold information provided by third parties where this is relevant to your housing circumstances e.g. from social workers and health professionals (such as doctors and occupational therapists).

We will only ask for personal information that is appropriate to enable us to deliver our services. In some cases you can refuse to provide your details if you deem a request to be inappropriate. However, you should note that this may impact our ability to provide some services to you if you refuse to provide information that stops us from doing so.

### **How we manage your personal information**

We process your personal information in accordance with the principles of GDPR.

We will treat your personal information fairly and lawfully and we will ensure that information is:

- Processed for limited purposes.
- Kept up-to-date, accurate, relevant and not excessive.
- Not kept longer than is necessary.
- Kept secure.

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Access to personal information is restricted to authorised individuals on a strictly need to know basis.

We are committed to keeping your personal details up to date, and we encourage you to inform us about any changes needed to ensure your details are accurate.

To help us to ensure confidentiality of your personal information we may ask you security questions to confirm your identity when you call us. We will not discuss your personal information with anyone other than you, unless you have given us prior written authorisation to do so.

### **Periods for which we will store your personal information**

We will only hold your records during the period of our relationship with you and for a set period afterwards to allow us to meet our legal obligations including resolving any follow up issues between us.

### **Sharing your personal information**

Normally, only Salvation Army Homes staff will be able to see and process your personal information. However, there may be times when we will share relevant information with third parties for the purposes as outlined, or where we are legally required to do so. When sharing personal information, we will comply with all aspects of the GDPR. Special categories of personal data about health, sexual life, race, religion and criminal activity for example is subject to particularly stringent security and confidentiality measures.

Where necessary or required, we may share information as follows:

- To comply with the law (e.g. the police, Inland Revenue, Council Tax Registration Officer, Social Security Fraud Act) or a court order.
- Where there is a clear health or safety risk to an individual or members of the public, evidence of fraud against Salvation Army Homes, other irregular behaviour or a matter Salvation Army Homes is investigating.
- In connection with court proceedings or statutory action to enforce compliance with tenancy conditions (e.g. applications for possession or for payment of Housing Benefit direct).
- Where Salvation Army Homes has entered into a formal protocol with the police or a local authority department.
- Providing the name, address and contact number of a resident to contractors or other agents providing services on Salvation Army Homes behalf, such as Warden Call services in our Older People Services.
- Providing the name of a resident and the date of occupancy to gas, electricity and water companies.

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- Providing information anonymously for bona fide statistical or research purposes, provided it is not possible to identify the individuals to whom the information relates.
- Giving the name, address and stated local connection of applicants for housing to parish councils for housing which gives priority to people with a local connection.
- Information required by the Regulator of Social Housing (RSH) when monitoring Salvation Army Homes activities in its capacity as the regulator of housing associations.
- The names of contractors invited to tender for works and the amounts tendered will be made available to residents paying service charges to which the cost of the works will be charged (Section 20 Landlord and Tenant Act 1985, as amended).
- To protect the vital interests of an individual (in a life or death situation).
- Providing the name and contact details with our Customer Groups - Together 4 Resident and Champion 4 Residents, when they are undertaking resident scrutiny activity on our behalf. We will obtain your consent before we do so.

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## Your rights under the GDPR

<p><b>Access to personal information</b></p>	<p>To access 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.</p> <p>You can exercise your rights, including Subject Access Requests, by contacting our Data Protection Officer at: <a href="mailto:DPO@salvationarmyhomes.org.uk">DPO@salvationarmyhomes.org.uk</a>. We will conduct reasonable and proportionate searches to fulfil your request.</p>
<p><b>Rectification</b></p>	<p>If you need us to correct any mistakes contained in the information we hold about you, you can let us know by contacting your neighbourhood officer or alternatively, contact customer services at Salvation Army Homes, Customer Service Centre, 2<sup>nd</sup> Floor, 53-55 Victoria Square, Bolton, BL1 1RZ or telephone 0800 970 6363.</p>
<p><b>Erasure ('right to be forgotten')</b></p>	<p>You have the right to ask us to delete personal information we hold about you. You can do this where:</p> <ul style="list-style-type: none"> <li>• The information is no longer necessary in relation to the purpose for which we originally collected/processed it.</li> <li>• Where you withdraw consent.</li> <li>• Where you object to the processing and there is no overriding legitimate interest for us continuing the processing.</li> <li>• Where we unlawfully processed the information.</li> <li>• The personal information has to be erased in order to comply with a legal obligation.</li> </ul> <p>We can refuse to erase your personal information where the personal information is processed for the following reasons:</p> <ul style="list-style-type: none"> <li>• To exercise the right of freedom of expression and information.</li> <li>• To enable functions designed to protect the public to be achieved e.g. government or regulatory functions.</li> <li>• To comply with a legal obligation or for the performance of a public interest task or exercise of official authority.</li> <li>• For public health purposes in the public interest.</li> <li>• Archiving purposes in the public interest, scientific research historical research or statistical purposes.</li> <li>• The exercise or defence of legal claims; or</li> </ul>

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	<ul style="list-style-type: none"> <li>Where we have an overriding legitimate interest for continuing with the processing.</li> </ul>
<b>Restriction on processing</b>	<p>You have the right to require us to stop processing your personal information. When processing is restricted, we are allowed to store the information, but not do anything with it. You can do this where:</p> <ul style="list-style-type: none"> <li>You challenge the accuracy of the information (we must restrict processing until we have verified its accuracy).</li> <li>You challenge whether we have a legitimate interest in using the information.</li> <li>If the processing is a breach of the GDPR or otherwise unlawful.</li> <li>If we no longer need the personal data but you need the information to establish, exercise or defend a legal claim.</li> </ul> <p>If we have disclosed your personal information to third parties, we must inform them about the restriction on processing, unless it is impossible or involves disproportionate effort to do so.</p> <p>We must inform you when we decide to remove the restriction giving the reasons why.</p>
<b>Objection to processing</b>	<p>You have the right to object to processing where we say it is in our legitimate business interests. We must stop using the information unless we can show there is a compelling legitimate reason for the processing, which override your interests and rights or the processing is necessary for us or someone else to bring or defend legal claims.</p>
<b>Withdrawal of consent</b>	<p>You have the right to withdraw your consent to us processing your information at any time. If the basis on which we are using your personal information is your consent, then we must stop using the information. We can refuse if we can rely on another reason to process the information such as our legitimate interests.</p>
<b>Right to data portability</b>	<p>The right to data portability allows individuals to obtain and reuse their personal data across different services. It allows individuals to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way. The right only applies to personal data you have provided to us where the reason we are relying on to use the information is either your consent or for the performance of a contract. It also only applies when processing is carried out by us using automated means.</p>

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### **Automated decision making**

In the light of constantly evolving technology, we may engage in automated decision making or profiling, for example, our Voicescape arrears software uses machine learning and algorithms to decide whether to present a tenants rent account for action. If we engage in automated decision making, we will do so responsibly and with safeguards in place. For example, if a decision is made about you based solely on automated processing, we will inform you of the existence of such processing, the rationale behind decision and the information used. You have the right to request a “human” review of this decision.

### **International Data Transfers**

We may transfer the personal information we collect about you to countries outside the United Kingdom (UK) or European Economic Area (EEA) in order to perform our contract with you or to comply with our legal obligations. We will only do so where appropriate safeguards are in place, such as:

- An adequacy regulation issued by the UK Government, confirming that the recipient country provides an adequate level of protection for your personal information;
- Standard contractual clauses approved by the UK Government, ensuring equivalent data protection standards; or
- Other lawful mechanisms permitted under the UK GDPR.

### **Changes to this Privacy Notice**

We keep our privacy notice under regular review and will place any updates on our website; you will be notified of any major changes to this policy.

### **Further information**

We have appointed a Data Protection Officer (DPO). The DPO oversees compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact our Data Protection Officer using the contact details provided on page 1.

You have the right to make a complaint at any time, if you wish to do so, please contact our Data Protection Officer via email at: [dpo@salvationarmyhomes.org.uk](mailto:dpo@salvationarmyhomes.org.uk) We will acknowledge your complaint within 30 days and respond without undue delay. You may escalate unresolved complaints to the Information Commissioner's Office (ICO - the UK supervisory authority for data protection issues) at <https://ico.org.uk/make-a-complaint/>

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