

## **PENNINE LANCASHIRE CHOICE BASED LETTINGS SCHEME KNOWN AS B-WITH-US**

### **Privacy Notice for Rental Applicants**

All of the Partners of the Pennine Lancashire Choice Based Letting Scheme known as B-with-us are committed to protecting the privacy and security of your personal information.

The Partners include:

- Accent Housing
- Blackburn with Darwen Borough Council
- Burnley Borough Council
- Calico Homes
- Great Places Housing Group
- Housing & Care 21
- Hyndburn Borough Council
- Irwell Valley Housing Association
- Muir Group Housing Association Ltd
- Onward Homes
- Pendle Borough Council
- Places for People Ltd
- Regenda Group
- Rossendale Borough Council
- The Guinness Partnership
- Together Housing Association
- Your Eaves Brook

This Privacy Notice outlines how we collect and use the information that you provide as one of our applicants for housing or through your use of this website. It makes you aware of how and why your personal information will be used, namely for the purposes of the administration of the B-with-us Scheme, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

This Notice primarily covers how we use information relating to applications for housing through the B-with-us Scheme, website visitors and people who interact with or do business with us (such as our suppliers). In these cases, each of the Partners listed above is a “data controller” for the purposes of data protection law. Each of the Partners have signed up to an Information Sharing Agreement which governs the way in which we use personal information provided to us as part of the B-with-us Scheme.

It is important that you read this Notice, together with any other privacy notice any of the Partners may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

### **Data Protection Principles**

There are six overarching principles of the GDPR which each Partner will comply with when using your personal information:

1. Using the personal information lawfully, fairly and in a transparent way.
2. Collecting your personal information only for valid purposes that are clearly explained to you and not used in any way that is incompatible with those purposes.
3. The personal information is relevant to the purposes we have told you about and limited only to those purposes.
4. The personal information is accurate and kept up to date.
5. The personal information is kept only as long as necessary for the purposes we have told you about.
6. The personal information is kept securely.

## **What data is collected?**

If you register and apply for a rental property, bid on a property, communicate with us, or do business with us, this will result in us collecting personal information about you. We will collect, store, and use the following types of personal information about you:

- Contact details such as the name, address (including former addresses), email, and telephone number
- Gender
- National Insurance Number
- Details of any dependents
- Employment details and circumstances
- Financial details including any current or former rent arrears and your eligibility to certain benefits
- Technical information such as includes IP address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- Information about how you use our website, and services.

We will also collect the following “special categories” of sensitive personal data and we will take extra care to ensure your rights are protected:

- Nationality
- Religious information
- Sexual Orientation
- Whether or not you are subject to immigration control
- Information about your health including disability information, pregnancy information and any physical or mental health conditions
- Criminal offences data including anti-social behavior and criminal convictions

## **How we will use information about you:**

We will use the personal information we collect about you to:

- To register you as an applicant with the B-with-us Scheme.
- To perform our contract or service to you.
- To manage our relationship with you, including notifying you about changes to our contract or services or asking you to provide us with feedback.
- To administer and protect the business and this website.
- To make suggestions or recommendations to you about similar services that may be of interest to you.

## **Why do we need this information?**

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- a) Where we need to perform the contract we have entered into with you.
- b) Where we need to comply with a legal obligation.
- c) Where it is necessary for the performance of a task carried out in the public interest.
- d) Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Generally, we do not rely on consent as a legal basis for processing your personal information other than in relation to sending direct marketing communications to you via email or text message. You have the right to withdraw consent to such marketing at any time.

**If you fail to provide personal information:**

If you fail to provide certain information when requested either by law, or under the terms of a contract we have with you and you fail to provide that information when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, your application for housing may be refused).

**Automated decision-making:**

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

**Data sharing**

Your information will be shared with the Partners of the B-with-us Scheme that are outlined above and this information sharing is governed by an Information Sharing Agreement in accordance with current data protection law. Your information may also be used for housing management and statistical purposes although individuals will not be identified.

Where it is legally required or necessary in accordance with data protection law, we may share information with:

- Our regulator;
- Financial organisations;
- Our auditors;
- Our suppliers;
- Survey and research organisations;
- Professional advisers and consultants;
- Police forces, courts, tribunals;
- Professional bodies;
- Central and local government;
- Health and welfare authorities; and
- Other housing associations, trusts or local authorities.

All our third-party service providers and suppliers 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 information for their own purposes. We only permit them to process your personal information for specified purposes and in accordance with our instructions.

**Data security**

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.

We have put in place procedures to deal with any suspected data security breach and will notify you and the Information Commissioner's Office of a suspected breach where we are legally required to do so.

**Data retention**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are available in our retention policy which is available from the partnership. After this period, we will securely destroy your personal information in accordance with our data retention policy.

## **What are your rights?**

As the data subject, you have specific rights to the processing of your data. Under the GDPR, you have the right to find out if we hold any personal information about you by making a "subject access request" under data protection law. If we do hold information about you, we will:

- Give you a description of it;
- Tell you why we are holding it;
- Tell you who it has been disclosed to; and
- Let you have a copy of the information in an intelligible form.

To make a request for your personal information, please contact **0300 123 22 00**.

Individuals also have certain rights regarding how their data is used and kept safe including the right to:

- Object to processing of personal data that is likely to cause, or is causing, damage or distress;
- Prevent processing for the purpose of direct marketing;
- Object to decisions being taken by automated means;
- In certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed;
- The right for your personal information to be transmitted electronically to another organisation in certain circumstances;
- Where the processing of your data is based on your explicit consent, you have the right to withdraw this consent at any time. This will not affect any personal data that has been processed prior to withdrawing consent; and
- Claim compensation for damages caused by a breach of the Data Protection regulations

## **Complaints**

If you have a concern about the way we are collecting or using your personal data, we would ask that you raise your concern with us in the first instance by contacting **0300 123 22 00**.

Alternatively you can make a complaint to the Information Commissioner's Office at <https://ico.org.uk/concerns/> or write to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

## **Changes to this Privacy Notice**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates.