

London Housing



Privacy Notice

Date of Publication May 2018

Table of Contents

Overview	3
What personal information we collect	3
Personal data includes:	3
Article (9) sensitive data:	4
4	
How we use your personal information:	4
Lawful basis for processing your data:	5
Third Party/ sharing your information	5
Disclosure of your personal data:	6
Data Subject rights under GDPR	6
Your Rights relating to your personal Data	6
Retention of your data	7
How your records are stored:	7
Complaint	8
Cookies	8
Contact us	8

Overview

This is a privacy policy relates London Housing Trust which is a Not for Profit organisation. The organisation provides supported housing and holistic tools to provide individualistic support to vulnerable people with complex needs.

A key requirement of the General Data Protection Regulation (EU) 2016/679, is that we gain your explicit consent to collect, process and store your personal data. London Housing Trust is committed to protecting your data, this privacy notice outlines how we collect, use and store your personal data in accordance with the General Data Protection Regulation (GDPR).

We may change this Privacy Notice from time to time, this is to ensure that we continue to comply and reflect the legal requirement of the General Data Protection Regulation. We therefore encourage you to visit this page regularly to to keep up to date with changes to this privacy policy and the date it was last updated.

What personal information we collect

Personal data, refers to any information about an individual from which that person can be identified, directly or indirectly.

We collect personal information directly from clients and indirectly from third parties, such as referral agencies and probation services.

Personal data includes:

Name and date of birth

Home Address

Contact details- email address, postal address

National Insurance Number

Bank details,

Telephone/mobile number, Photograph

Article (9) sensitive data:

London Housing Trust collect some data which are categorised as sensitive data, this includes genetic data, and bio metric data which can identify a person:

- Racial or ethnic origin
- Bio data details
- Criminal records
- Sexual orientation
- Physical and mental conditions
- Religious or philosophical beliefs

Sensitive data will only be recorded and stored where explicit consent is given, or there is a legitimate reason. For example where it is necessary to enable LHT to provide support and advice or where it will be impossible to provide services without doing recording these sensitive information. We will only collect sensitive data if we have a legitimate reason to do so. The basis for requesting your data is explain in the section below.

How we use your personal information:

1. LHT collects your information and the information provided by a third party, (referral agencies). To communicate with you, provide you with advice and information.
2. To enable LHT to meet our regulatory responsibility to deliver service and to meet your specific needs of our clients.
3. To communicate with you relating to services and if you make an inquiry.
4. For administrative purpose, to keep a record of our relationship with you as well as the history and relevant details of your tenure with us.
5. To process application to access our housing service
6. To gather feedback to improve our services
7. Information we may require from you when you report a problem or complaint.
8. Analyse how our services are used

Lawful basis for processing your data:

Purpose:

- You consented to the processing for a specific purpose
- The processing is required to comply with the legal and regulatory and contractual requirement.
- Legitimate interest: LHT has a legitimate interest because without that information we will not be able to meet our legal obligation, neither will we be able to provide an effective service.
- We ensure that we balance any potential impact on your rights unless we are otherwise required by law.
- We collect sensitive data, however we are committed to the safeguarding and will take extra care to ensure that your rights are protected

Third Party/ sharing your information

Generally we are not allowed to share Personal Data with third parties unless certain safeguards and contractual arrangements have been put in place.

We will only share your personal information with other agencies, when it is crucial to meeting our legal, regulatory and contractual obligation. We may use the following methods to send information via, email, SMS, or via electronic communication.

Third parties we will need to share your information with include, but not limited to:

- Council housing.
- DWP/Job Centre
- GP and medical professions
- Statutory bodies
- Private landlords

Disclosure of your personal data:

We will not share any of your personal data with any third party – except where:

- The transfer is to a secure data processor, which carries out data processing operations on our behalf.
- Where we are required to do so by law, for example where the information is requested by a government agency, regulatory bodies or law enforcement agencies.
- it is necessary to protect the vital interests of an individual
- Protect the property where you reside, or safety of our staff and clients.
- We will act on your explicit consent, unless we believe that you may be at risk and could suffer significant harm, that the disclosing of the data will protect you.

Data Subject rights under GDPR

- Article 7 (3) of the GDPR, gives data subject's the right to withdraw their consent at any time. When a request to withdraw consent is received. We tell you that you have the right to withdraw your data at any time, and how to do this contact London Housing Trust on 0208xxxx or email gdpr@londonhousingtrust.org.

Your Rights relating to your personal Data

- We will inform you how your personal data will be used. You have the right to know how your data will be processed and stored.
- Right to access your personal information we hold by writing to the Data Protection Officer to request information we hold about you. Once we confirm your identity we will process your request within thirty days or provide you with a reason for delay.

- Right to request for your information to be erased or forgotten, this means that you can request for your information to be deleted from our database.
- Right to rectification you can also ask LHT to complete information you think is incomplete.
- Right to Data Portability, you therefore have the right to receive personal data we hold about you electronically or paper base.
- Right to object to us using your personal data, as well as stop the processing of your personal information for reasons which you did not provide explicit consent. However LHT may refuse your request, where our legitimate reasons for processing, overrides your interest and rights.
- Where we are reliant on your consent to process your data, you have the right to withdraw your consent at any time.

Retention of your data

London Housing Trust will only keep your personal information for as long as we need to, for reasons stated in the privacy policy and to comply with any legal and regulatory body.

Unless we are required in relation with the reason for which it was collected and processed, we remove identifiable personal information from our records 7 years following our last communication with you.

If your personal data is no longer required in relation to the purpose it was collected and processed, we will remove the records at the relevant time.

In some cases we may anonymise your personal data so that you can no longer be identified from such data, for auditing purposes in which case we may use the data without notifying you.

How your records are stored:

- All paper base records are stored in locked cabinets, the office is open 24 hours.
- Electronically, using a company database.
- Security is also provided through our 24hour CCTV cameras.
- All our Office computers are password protected.

Complaint

If you have a complaint relating to the manner in which your data has been used, the information below informs you how to contact us

If you are dissatisfied with the response or the handling of your complaint you can make to complaint to the Information Commissioner Officer.

Cookies

Cookies. There are various types of cookies that perform different functions and generally improve your experience on the website. The types of cookies used on this website can be classified into one of three categories:

Strictly Necessary Cookies. These are essential in order to enable you to use certain features of the website, such as logging in or submitting forms on the website. Without these cookies, services you have asked for, such as making online donations, cannot be provided. These also include cookies that allow us to provide a service explicitly requested by you during a browser session. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the Internet.

Functionality Cookies. These are used to allow the website to remember choices you make (such as your username, language, or region) and provide enhanced features to improve your web experience.

Most of our cookies are first-party cookies, which are set by our website. Some are third-party cookies, which are set by different websites. In our lists of example cookies, we clearly identify third-party cookies.

Contact us

Contact the Data Protection Officer (DPO). If you have any queries about this policy, and will like more information, or want to exercise any of your rights under GDPR, you can contact us using the following method:

Write to us at the following address or complete the attached form.

London Housing Trust address is:

5 Quadrant Road,

Thornton Heath,

Croydon,

CR7 7DB

Email: Gdpr@londonhousingtrust.org

Tel: 0208 409 1227

