

# Halls of Residence Privacy Notice

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## Summary

This Privacy Notice is a public document available to anyone and applies to customers of Halls of Residence to explain how the organisation collects and processes personal information in order to conduct normal business activities as a UK Landlord. Normal activities can be summarised as:

1. Providing Assured Shorthold Tenancies in our properties.
2. Property and grounds maintenance and repair.
3. Managing your housing, tenancy/lease and account as your landlord.

## Who we are

Halls of Residence is the Data Controller whose head office is

located at 76 Norwich Road, Horstead, Norwich, NR12 7EG Tel: 07828 900790. The company Data Protection Officer can be contacted at [office@hallsofresidence.co.uk](mailto:office@hallsofresidence.co.uk).

We own several properties in Norwich (mostly student lets), and manage a couple of other properties we do not own.

### How we collect your information

Halls of Residence collects information from you via a variety of sources, including when you apply for one of our properties, complete one of our forms, when you call, write, e-mail or meet with us or respond to a survey. We may collect information when you use our Website.

From time to time we may use photography to capture evidence of breach of tenancy, alleged anti-social behaviour or crime.

We may also take photographs at our properties to use for general marketing and publicity. However, photographs of individuals will only be used for those purposes with your consent.

We may receive information about you from third parties including:

- Your council or benefits office relating to your housing.
- Prior landlords and credit agencies when you apply for housing.
- Police, welfare or support organisations dealing with you.
- Councillors, MPs or other representatives acting on your behalf/instruction.
- Financial institutions when you apply for our services.
- Universities and Colleges if you are a student.

## What information we collect about you

The information we require from you, the tenant(s), include:

- Full name (and proof of your identity / photo ID).
- Date of birth.
- National Insurance number (your unique identifier).
- Contact details (phone, e-mail or correspondence address).
- Details of anyone authorised to act on your behalf if applicable.
- Banking details if you pay your rent by Direct Debit.
- Proof of housing eligibility.
- Other personal information that will vary on a case by case basis to help us resolve breach of tenancy, alleged anti-social behaviour or fraud.

Other information we may collect from you includes:

- Financial information. We may use this to help resolve arrears payments and optionally to provide welfare, benefits and debt advice as a free service to help you budget and pay your bills.
- Photo ID, bank statements, payslips or income details when we require this information for processing eligibility to rent.
- Guarantor information. We may use this information to contact

the Guarantor in the event of non-payment of rent. This information includes Name, address, email and phone number of the Guarantor.

If you do not provide the information we need then we may not be able to provide all our services to you, and ultimately you may not be able to hold a tenancy with us.

### What processing we do with information collected

The information we require from you is used to manage your tenancy agreement or other contract between you and Halls of Residence. Please read your contract carefully for specific details as 'performance of a contract' is usually the legal basis for processing your information and carrying out our activities. The processing activities we conduct can be summarised as:

- Managing your account charges and payments, including arrears.
- Managing the repairs, maintenance and adaptations of our properties.
- Ensuring tenancy (or contract) conditions are complied with, such as dealing with anti-social behaviour or fraud.
- Complying with relevant legislation and regulation.

Halls of Residence operates a range of information and communications systems and technologies for efficient operation of the business.

We hold information in IT systems which may be copied for testing, backup, archiving and disaster recovery purposes. All electronic data is held within Dropbox, which is fully compliant with GDPR.

## Children's information

Halls of Residence does not normally process children's information as part of a tenancy, as all tenants are adults. However, we record children's basic information if they are resident in one of our properties, including their name and date of birth. This is required for checking the property is not overcrowded and to assess other tenancy management issues where all householders and ages are required to be known.

## Property information

Much of the data we use relates to our properties and their maintenance and repair. We do not consider property information used in conjunction with the property address to be your personal information. For example, the age of the kitchen, planning to replace windows or a repair to a tap.

We are usually happy to provide you with answers to questions you may have about the property you are living in and work done to it.

As soon as your name, contact details or other personal information is used in conjunction with property information, such as to complete a property repair visit, then this is treated as personal information.

## How we will communicate with you

Halls of Residence needs to communicate with our customers and this will usually be by telephone or email.

We will only discuss or communicate your tenancy or lease details with those named on the agreement or those authorised (temporarily or permanently) by you. You can authorise someone temporarily verbally over the phone or permanently in writing.

## Who we share data with and how long we keep information

Halls of Residence shares limited personal data with our contractors who are carrying out services on our behalf. Our contractors are required to comply with the law and GDPR to ensure data is managed appropriately and for specified purposes, including to complete emergency, responsive or planned property repairs.

We may share your information with a language translation service if it is necessary to translate any information into or from a foreign language for you.

Halls of Residence may need to share personal information with government departments and agencies, with our regulator and auditors, with utility companies or with other organisations and agencies where we are legally allowed to do so.

In the event of non-payment of rent after the tenancy ends, we may share information with a debt collection agency in order to recover unpaid rent.

Information relating to a tenancy or lease agreement will be kept for as long as the agreement is active or where money is owed on the account, and for a period not exceeding seven years afterwards. The basic history of who held a tenancy at which property and when will be held forever.

## What we will not do

We will not send you unsolicited marketing material. We will not sell your personal data on to third parties.

We will not pass on your personal data to unrelated third parties unless we are allowed or required to do so by law or we have your explicit permission to do that.

## Your rights, the right to complain and the ICO

You have the right to request a copy of the data we hold about you. Please contact [office@hallsOfresidence.co.uk](mailto:office@hallsOfresidence.co.uk) if you wish to request access to any of your personal data and we will always endeavour to answer your questions as part of our friendly, helpful service.

We will not normally make a charge for this service and will respond within one month of receiving your request.

It will always help if you can be as specific about what personal data you want to see, what it relates to and within what timeframe, as that will assist our search.

You have the right to correct information that we hold. Please advise us of any changes or corrections by contacting our Management team on 07828 900790 or [office@hallsOfresidence.co.uk](mailto:office@hallsOfresidence.co.uk).

You also have other rights which can be seen by visiting the Information Commissioner's Office (ICO) website and reading about Data Protection law at <https://ico.org.uk/>.

You have the right to complain about any matter relating to our service, including how we use your personal data:

- In the first instance please contact our Customer Services team on 07828 900790 or e-mail [office@hallsOfresidence.co.uk](mailto:office@hallsOfresidence.co.uk).
- If you are still not happy with our service you may complain to the Housing Ombudsman Service at <http://www.housing-ombudsman.org.uk/>.
- If you wish to complain about our use of your personal data you may complain to the UK Information Commissioner's Office (ICO) at <https://ico.org.uk/>. Up until 21<sup>st</sup> February 2019 our ICO registration number is ZA167916.

## Further information

For further information about Halls of Residence, please see our website [www.hallsofresidence.co.uk](http://www.hallsofresidence.co.uk) or contact our Management team.

## Changes to our Privacy Notice

Our Privacy Notice is regularly kept up to date and this version was updated on 21<sup>st</sup> November 2018. The latest full version is always available from our website at [www.hallsofresidence.co.uk](http://www.hallsofresidence.co.uk)