



CUSTOMERS - PRIVACY POLICY

MHA generates records from our contact with you, including records of some personal information which is subject to UK GDPR. We hold and process this information to fulfil our contract to you and/or facilitate our legitimate interests as a social landlord.

WHO DOES THE PERSONAL INFORMATION RELATE TO?

Customers (tenants)

This includes current, former and potential customers, who live in our properties and could also include their family and people associated with them. When you provide information about household members, we assume that you do so with their full knowledge and consent.

Customers (non-MHA tenants)

This includes general members of the public and/or the proprietor of a property.

UK GDPR PROMOTES THE FOLLOWING PRINCIPLES:

- Processed lawfully, fairly and in a transparent manner
- Collected only for legitimate purposes that have been clearly explained to you and not further processed in a way that is incompatible with those purposes
- Adequate, relevant and limited to what is necessary in relation to those purposes
- Accurate and, where necessary, kept up to date
- Kept in a form which permits your identification for no longer than is necessary for those purposes.
- Processed in a way that ensures appropriate security of the data
- Accountability, MHA will be accountable for how we handle personal data

HOW AND WHY WE USE YOUR PERSONAL DATA?

We will collect, process, share and securely store personal information in compliance and UK GDPR. We will use this information to fulfil our obligations to you as a social landlord.

We keep these records to allow us to:

- Make allocations
- Manage tenancies
- Receive rent and service charges
- Provide a repairs and maintenance service
- Provide home ownership products
- Offer help with debts and benefits
- Prevent & detect crime and resolve disputes
- Promote safety and the quiet enjoyment of our neighbourhoods & communities
- Engage with customers and make improvements to our services
- Promote equal opportunities and fair treatment for all customers
- Provide information (e.g., about services) you request from us.

Under data protection law, we can only use your personal data if we have a proper reason, e.g.:

- where you have given consent;
- to comply with our legal and regulatory obligations;

- for the performance of a contract with you or to take steps at your request before entering into a contract; or
- for our legitimate interests or those of a third party.

A legitimate interest is when we have a business or commercial reason to use your personal data, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own.

In all cases, we will only collect information we need to provide you with the service(s) you have requested and to meet our legal and contractual obligations.

“SPECIAL CATEGORY” PERSONAL INFORMATION

Under UK GDPR certain personal information is classified as “Special category”. Special category personal data is information relating to physical or mental health, sexual orientation, religious or philosophical beliefs, political opinions, membership of a Trade Union, allegations of criminal offences and criminal convictions and offences.

We minimise our holding and use of sensitive categories of personal information but, given the services we provide, there are times when we use it, for example when providing accommodation for disabled persons, when resolving neighbourhood disputes involving alleged criminal activity or when helping someone to access care services.

When we collect specific sensitive data, we will notify you of how we will use it, including who it may be shared with.

Where we process special category personal data, we will also ensure we are permitted to do so under data protection laws, e.g.:

- we have your explicit consent;
- the processing is necessary to protect your (or someone else’s) vital interests where you are physically or legally incapable of giving consent; or
- the processing is necessary to establish, exercise or defend legal claims.

HOW DO WE COLLECT PERSONAL INFORMATION FOR TENANTS?

We collect information in a variety of ways including on various forms, tenancy agreements, and contracts; through our on-going contact with you; in some cases, we also collect CCTV images. Calls to and from our main office phones may be recorded.

When you apply to become an MHA customer, we request and hold on file any references necessary to assess your application including as appropriate (but not limited to):

- References from other housing providers/private landlords
- Your mortgage lender (if you own/have owned your own home)
- External agencies such as the Police, the Probation Service, support workers, social workers, mental health workers or legal representatives who may be acting for you and
- Credit reference agencies or financial institutions.

We may also receive information from your web browser about how you use our website, including which web pages you visit. Whilst this information includes your IP address (a unique identifier assigned to your internet connection) it does not identify you personally.

It is important that you notify us of any changes to your personal information you can do this by contacting our Customer Service team via email; info@manninghamha.co.uk or telephone 01274 771144

WHAT INFORMATION WE HOLD ABOUT YOU AND HOW WE WILL USE IT

We may collect various types of personal data about individuals depending on the services you receive and your contact with us. The information we hold about you is usually information you have given us, or information related to your history with MHA. Depending upon your circumstances this may include:

- Names and dates of birth of people in your household to keep our records up to date and help prevent tenancy fraud and illegal subletting.
- Contact details, such as telephone numbers and email addresses, so that we can communicate with you and keep you informed about other services which may be useful to you.
- Transaction history, such as payments of your rent or invoices, and your bank account details.
- Proof of identity.
- IP address and information regarding what pages you accessed and when.
- Information related to your health or the health of other occupants.
- Financial assessments on your household income and expenditure to help you to improve your financial circumstances.
- Recordings of your telephone calls to and from us, as some of our calls are recorded for training and monitoring purposes so that we make sure we are providing you with a good service.
- We may capture your image on CCTV systems if you visit one of our estates or offices. We use CCTV systems for security purposes and to help prevent and detect crime.
- We use third party software (which resides on our own servers) which uses A.I. to analyse rent and tenancy related transactions in a non-intrusive way in order to help us better manage individual tenancies and anticipate and pro-actively manage likely and/or potential tenancy and/or rent related issues.
- We utilise A.I. sentiment analysis on our telephony system to help our staff improve on their customer service skills.
- We utilise an A.I. service that transcribes calls and generates a summary of a conversation, the summaries are securely stored and encrypted by our service provider.
- We utilise chatbot platform that may on occasion generate an AI powered chatbot service/response.
- Access to AI-generated transcripts, summaries and analysis will be restricted to staff who require the information for an authorised purpose.
- We may hold information provided by third parties where it is relevant to your circumstances, for example, information from social workers or health professionals.

WHO WE SHARE YOUR PERSONAL DATA WITH

There may be situations where it is necessary for us to share some of your information with others. Where this is the case, we will only share this information when we are required to do so by the law and in line with our obligations under the UK GDPR and/or the Data Protection Act 2018. Examples include situations involving the prevention and detection of crime and to safeguard customers where they may be at risk. Some of the organisations that we may share data with include:

- The police and other relevant authorities (such as the DWP, Probation Service and HMRC) in relation to the prevention and detection of crime, the apprehension of offenders or the collection of tax or duty
- Local authorities, to assist with any applications or matters related to your housing, such as Council Tax
- Government departments related to Housing Benefit, with regard to changes in rent or to discuss important matters on your behalf
- Utility companies and their representatives such as gas, electricity or water companies to ensure billing details are correct and to pursue any outstanding revenues
- Regulators, such as the Regulator of Social Housing and Care Quality Commission
- Organisations that we contract or partner with to provide services to our customers, such as our contractors to facilitate repairs, maintenance or improvement works

- Other statutory organisations, such as social services and health authorities as necessary for exercising statutory functions, health and welfare advisors, GPs or other medical professionals involved in your care
- Debt and money management advisers
- Agencies committed to protecting public funds and/or preventing fraud in line with the National Fraud Initiative.

We may also share information when required by law for example where ordered by the Court or to protect an individual from immediate harm. We may also share your information with third party service providers working on our behalf for the purposes of completing tasks and providing services to you on our behalf.

However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure as required by the Data Protection Act 2018 and General Data Protection Regulation 2016 (GDPR), and not to use it for any other purposes.

We will not pass your details onto any organisation without your permission, unless you have explicitly allowed us to.

We only allow those organisations to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on them to ensure they can only use your personal data to provide services to us and to you.

We or the third parties mentioned above occasionally also share personal data with:

- our external auditors, e.g. in relation to the audit of our accounts, in which case the recipient of the information will be bound by confidentiality obligations;
- our and their professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations;
- law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations;
- other parties that have or may acquire control or ownership of our business (and our or their professional advisers) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency—usually, information will be anonymised but this may not always be possible. The recipient of any of your personal data will be bound by confidentiality obligations.

HOW SECURE IS THE INFORMATION?

We take information security very seriously and we use digital security technology to ensure that data is safe and secure. We ensure that third parties working with us adhere to the same high standards of security. Where information is held in paper files, we ensure safe physical protection of the records in locked filing cabinets and rooms. We also operate a clear desk policy to ensure that paperwork is not left on desks or information on computer screens whilst the member of staff is away.

We also have procedures to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you want detailed information from Get Safe Online on how to protect your personal data and other information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org Get Safe Online is supported by HM Government and leading businesses.

TRANSFERRING YOUR PERSONAL DATA OUT OF THE UK

The UK Countries the UK have differing data protection laws, some of which may provide lower levels of protection of privacy.

MHA does not anticipate having to transfer your personal data outside of the UK. however if this becomes necessary for any legitimate business, regulatory, legal or service related reason then we will comply with applicable UK laws designed to ensure the privacy of your personal data.

HOW LONG WILL YOU KEEP INFORMATION FOR?

All information will be retained in accordance with the requirements of our retention schedule which is based on the [National Housing Federations \(NHF\) Retention Schedule guidelines](#). As a general rule, we hold personal information for as long as you have a contract with us, plus up to 6 years or 6 years after any arrears have been settled.

MHA Chat bot conversation history is kept on file for 12 months before the conversation is deleted.

YOUR RIGHTS

Access

The right to be provided with a copy of your personal data

Rectification

The right to require us to correct any mistakes in your personal data

Erasure (also known as the right to be forgotten)

The right to require us to delete your personal data—in certain situations

Restriction of processing

The right to require us to restrict processing of your personal data in certain circumstances, eg if you contest the accuracy of the data

The right to object:

- at any time to your personal data being processed for direct marketing (including profiling);
- in certain other situations to our continued processing of your personal data, eg processing carried out for the purpose of our legitimate interests unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise or defence of legal claims

Not to be subject to automated individual decision making

The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

The right to withdraw consents

If you have provided us with a consent to use your personal data you have a right to withdraw that consent easily at any time

Withdrawing a consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn

EXERCISING YOUR RIGHTS

If you would like to exercise any of those rights, please:

- email dpm@manninghamha.co.uk call or write to us at Manningham Housing Association, Bank House, 30 Manor Row, BD1 4QE – marked for the attention of the Data Privacy Manager ; and
- provide enough information to identify yourself (e.g. your full name, address and customer or matter reference number) and any additional identity information we may reasonably request from you;
- let us know what right you want to exercise and the information to which your request relates.
- Withdrawing a consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn

COMPLAINTS OR ENQUIRIES

We take any complaints we receive about personal data processing very seriously. If you do make a complaint or enquiry, we may collect and store personal information in relation to this matter, which may include accessing CCTV or phone recordings. We will keep it secure and use it only for the purpose it was collected. When the matter is resolved or completed, we will retain the details in accordance with our retention schedule and then destroy them.

If you feel that any of your rights have been infringed, you have the right to submit a data protection complaint to our Association; please refer to our data protection complaints policy. Or you could lodge a complaint with the Information Commissioner’s Office (www.ico.org.uk).

CHANGES TO THIS PRIVACY POLICY

We may change this privacy notice from time to time—when we do we will inform you via a notice on one of our social media channels or via the tenant Feedback Magazine.

Name of Notice	Privacy Notice Customers
Last Reviewed	September 2023
Interim Review	June 2026
Next Review date	September 2026
Lead Officer	Data Privacy Manager