



## **GENERAL INFORMATION - PRIVACY POLICY**

Manningham Housing Association Limited (MHA) is a Registered Society and operates from Bank House, Manor Row, Bradford, BD1 4QE and is a provider of social housing to the communities of Bradford and Keighley.

MHA is data controller as defined in the 2018 UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (UK GDPR). The Data Privacy Manager for MHA can be contacted on [dpm@manninghamha.co.uk](mailto:dpm@manninghamha.co.uk)

We are registered with the Information Commissioners Office under reference: Z728485X and we are open and transparent about the information we hold, why we hold it and for how long.

Depending on the nature of your interactions with us MHA may generate records from our contact with you, including records of some personal information which is subject to UK GDPR. Where you are an actual or prospective tenant we will typically hold and process this information to fulfil our contract to you and/or facilitate our legitimate interests as a social landlord.

## **HOW SECURE IS THE INFORMATION?**

We take information security very seriously and we use appropriate and recognised digital security technology to help 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 from their workstation.

## **COMPLAINTS OR ENQUIRIES**

We take any complaints we receive about personal data processing very seriously. If you do make a complaint or enquiry to us, we may collect and store personal information in relation to this matter, which may include accessing CCTV or phone recordings. We will keep this information secure and use it only for the purposes it was originally collected for and/or anywhere a complaint or enquiry is raised for the purposes of investigating dealing with that complaint or enquiry. When the matter is resolved or completed, we will retain the details in accordance with our retention schedules prior to it being permanently deleted and/or destroyed.

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](http://www.ico.org.uk)).

## **INFORMATION WE COLLECT VIA THE WEBSITE**

We collect and store personal information via our website for several reasons including to help us provide better services and products to customers and potential customers. The information we collect fits into two categories:

1. Personal information entered via online forms or via our MHA chat bot by visitors to our website
2. Anonymous statistical information collected by cookies

If you request a repair, call back or information from us via an email, online form or register your interest in a service we will use your information to fulfil that request prior ultimately to deleting it in accordance with our retention policy once the request has been completed.

## **USE OF ARTIFICIAL INTELLIGENCE**

MHA uses certain artificial intelligence and automated tools to support its administrative, communication, customer-service and employment activities.

AI-generated information may be used to assist employees and managers, but MHA will not rely on an AI-generated output to make a decision that has a legal or similarly significant effect on an individual.

MHA does not permit employees to enter personal, confidential or special-category information into an AI service unless the service has been approved for that purpose and appropriate data-protection and security arrangements are in place.

### **COOKIE USE**

In order to provide you with the best experience, our website needs to place small text files, known as 'cookies', on your device.

Most cookies we use are 'session' cookies and only exist for the time that you are using our site. They perform functional tasks – such as remembering that you are logged in as you move from page to page. We also track cookies anonymously for site analytics, to improve the user experience on our website and to make our products and services more relevant.

You can set your browser to reject all cookies, or alternatively you will be asked when entering our website if you would like to accept or reject our cookies. Please note that if you do this then certain areas of this website will not be able to function for you. To find out more, please see our [Cookie Policy](#).

We also use technology that uses Internet Protocol (IP) information exchanges during the course of normal web activity combined with data-enhancement technology to get detailed analytics information. This only allows us to see how well our site is working and does not result in the collection of any personal data.

### **CCTV**

Some of our schemes and offices have CCTV in public areas to deter crime and anti-social behaviour and to promote public safety by helping to identify and prosecute criminal offenders. You can ask for a copy of any CCTV images taken of yourself by making a 'subject access request'. See Accessing your Information.

### **SHARING YOUR INFORMATION**

Your personal information will be kept secure and confidential. Usually, we will not disclose personal data without consent but we may share information including where necessary personal data between the MHA group of companies and with third parties such as:

- Contractors who deliver repairs and improvements (including our out-of-office providers)
- IT providers who manage our IT system and phones
- Training and Learning providers
- Distribution companies who help us to send our newsletter and other communications to you
- Third parties who help us to assess and manage our customer satisfaction
- Other agencies we work with, including Local Authorities, Social Services, Police, other social landlords and other agencies when MHA believes it is in your or the public's interest to do so, or as required by law

In particular, please be aware:

- Current or forwarding addresses may be shared legally with utility companies and Council Tax offices to ensure billing details are correct
- If you default upon any tenancy conditions, information about you may be provided to authorised debt recovery agencies and/or legal representatives to enable them to recover the debt. This may affect future applications for tenancies, credit and insurance
- We may discuss your financial situation, rent payments (including any arrears) and any claims made for welfare benefits with; an external debt advice agency, welfare rights advisor, the housing benefit department or the local authorities housing advice and homeless prevention team to make sure that benefits are paid correctly
- All current customers claiming housing benefit and Universal Credit (UC) their names, addresses and rent amounts are shared at the end of each year with local authority benefits teams and Dept. of Works & Pensions (DWP) to help claims for housing benefits and UC and so changes to housing benefits and UC happen more quickly and easily for everyone

## ACCESSING YOUR INFORMATION

Please contact us using your preferred contact method if you would like copies of some specific information from your files, and we will try to provide it as quickly as possible.

If you require a substantial amount of your personal information, there is a formal process for this, under UK GDPR known as a **Subject Access Request (SAR)**.

### What you need to know about making a Subject Access Request:

You can make a written or verbal request, however we always recommend you make a written request so we can understand specifically what information is being asked for; please address written requests to our Data Privacy Manager at Manningham Housing Association, Bank House, 30 Manor Row, BD1 4QE or email [dpm@manninghamha.co.uk](mailto:dpm@manninghamha.co.uk).

- We may require proof of your identity and address – we will let you know this when we receive your request
- We do not ordinarily charge for the request
- When we receive your valid request – with proof of ID/address if required – we will respond and provide your information within 30 calendar days unless the request is complex, in this case we may need to inform you that we require additional time to meet your request

You can request to see any of the information that we may hold about you, however, please be aware that we may need to edit and/or redact some information, if it relates to other people, as we must protect the privacy rights of all individuals and/or if a relevant exemption applies.

If you have any queries about accessing your information please contact our Data Privacy Manager.

## SECURITY OF INFORMATION

We use technology to ensure that our IT systems are secure. Security is reviewed with our IT supplier on a regular basis to ensure we meet our high standards of security. For further information on how we maintain the security of your information, please view our MHA Data Protection Policy.

## CHANGES TO OUR PRIVACY NOTICE

This privacy notice will be updated to reflect changes either to the way in which we operate or changes to the data protection legislation. To make sure that you keep up-to-date, we suggest that you revisit this notice from time-to-time.

## HOW TO CONTACT US

If you have any queries about our website or about how we process data, please contact our Data Privacy Manager on [dpm@manninghamha.co.uk](mailto:dpm@manninghamha.co.uk).

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| <b>Name of Notice</b>   | Privacy Notice General |
| <b>Last Reviewed</b>    | September 2023         |
| <b>Interim Review</b>   | June 2026              |
| <b>Next Review date</b> | September 2026         |
| <b>Lead Officer</b>     | Data Privacy Manager   |