

ADVANCE HOUSING AND SUPPORT LTD

Privacy Notice: Customer

Introduction

As part of the housing and support services we offer, we are required to process personal data about our customers, which may include children, our staff and, in some instances, the friends or relatives of our customers and staff.

‘Processing’ can mean collecting, recording, organising, storing, sharing or destroying data. This document will explain how and why we process your data.

We are committed to providing transparent information on why we need your personal data and what we do with it. This information is set out in this privacy notice. It will also explain your rights when it comes to your data.

If you have any concerns or questions, please contact our Data Protection Officer or our Customer Services team:

Contacting Customer Services:	Contacting our Data Protection Officer and registered office:
Phone: 0333 012 4307 Email: customer.services@advanceuk.org Website: www.advanceuk.org/contact-us	Phone: 0333 012 430 Email: data.protection@advanceuk.org Address: Advance Housing and Support Ltd 2 Witan Way, Witney Oxon, OX28 6FH

Who are we?

Advance Housing and Support (company number 21143) registered in England and Wales and whose registered office is at 2 Witan Way, Witney, Oxon OX28 6FH are committed to protecting your privacy and keeping any personal data you provide to us confidential at all times, in accordance with UK data protection laws. This Privacy Notice sets out the information processing activities that Advance Housing and Support carries out in its capacity as data controller (registration number Z5558247).

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All personal data collected by Advance Housing and Support is processed in compliance with the requirements of the UK General Data Protection Regulation, the UK Data Protection Act 2018 and any other relevant legislation.

What is personal information?

Personal information can be anything that identifies and relates to a living person. This can include information that when put together with other information can be then identify a person.

How do we collect your information?

When you apply to become an Advance Housing and Support customer, we obtain information to determine your housing and support needs.

You will provide us with information through your application and or referral form. We will also use information from third parties such as other housing providers/private landlords, your mortgage lender (if you own/have owned your own home), the Police, the Probation Service, support workers, social workers, mental health workers and credit reference agencies where appropriate to help us to assess your application.

We also collect information when you voluntarily complete customer surveys, provide feedback or where there is general correspondence. Further information may be collected during the tenancy.

We may also collect special categories of personal data. This is considered “special” and more protection is required due to its sensitivity. It is often information you would not want widely known and is very personal to you. This is likely to include anything that can reveal your:

- sexuality and sexual health
 - religious or philosophical beliefs
 - ethnicity
 - physical or mental health
 - trade union membership
 - political opinion
 - genetic/biometric data
 - criminal history
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The table below sets out what personal data we process, our purpose for doing so, our lawful justification and how long we keep it for: The table below lists the type of information we collect, the purpose of collecting and the legal basis for doing so:

Type of personal data	Purposes of processing	Lawful basis (Article 6 UK GDPR)	Condition (Article 9 UK GDPR)
Contact details (name, address, phone, email)	To manage tenancy and/or support agreements, provide customer service, and communication regarding our services	6(1)(b) Performance of a contract (tenancy and or support agreement)	N/A
Financial information (bank details, income)	Rent and/or support charges collection, assessing eligibility for housing and/or support services	6(1)(b) Performance of a contract 6(1)(f) Legitimate interest (rent and/or support charges collection)	N/A
Identification details (ID documents, National Insurance number)	Identity verification and fraud prevention	6(1)(c) Legal obligation	N/A
Tenancy and/or support history (previous addresses, references)	Assessing applications, managing tenancy and/or support arrangements, and dispute resolution	6(1)(b) Performance of a contract	N/A
Health and support information (disability, medical conditions, care & support needs)	To provide appropriate accommodations and/or services tailored to customer needs	6(1)(c) Legal obligation 6(1)(d) Vital interests (emergency situations)	9(2)(b) Employment, social security, and social protection 9(2)(c) Vital interests

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Criminal record data (if applicable)	Assessing housing and/or support applications where applicable	6(1)(e) Public interest	9(2)(g) Substantial public interest (safeguarding vulnerable individuals)
Emergency contact details	To contact in case of emergency or incidents affecting the customer	6(1)(d) Vital interests	N/A
Equality and diversity data (ethnicity, religion, etc.)	Monitoring compliance with equality legislation, ensuring non-discrimination	6(1)(c) Legal obligation	9(2)(g) Substantial public interest (equality of opportunity monitoring)
CCTV footage (in communal areas, if applicable)	Crime prevention and security of the premises, customers, staff and visitors	6(1)(f) Legitimate interest (security of premises)	N/A
Maintenance and repairs data (e.g., repair requests, access to property)	Managing maintenance and repair requests, scheduling property inspections	6(1)(b) Performance of a contract	N/A

Legitimate interests

When we process your personal information for our legitimate interests, we will consider and balance any potential impact on you and your rights under data protection and any other relevant law. Our legitimate business interests do not automatically override your interests – we will not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Consent

We may sometimes process your data for specific purposes which require your consent. If we do this, we will always ask for your written consent. Where we are processing your personal

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data based on your consent, you have the right to withdraw that consent at any time. This may affect the services that we can make available to you, but this will be explained in the consent form. Please contact us if this is the case.

How will we use your information?

Advance Housing and Support will collect and use your information to enable us to respond to your enquiries, provide you with services and manage your relationship with us and to identify areas where we can improve the services we provide.

We collect most of our information directly from you. This happens in several ways, but is not limited to, when you contact us via our website or mobile app, write to us, meet with our staff or phone us.

We will collect information from you:

- When you complete an application form for one of Advance's services
- Or other supplementary information forms if needed
- When you enter into a tenancy and/or support agreement with us
- When you report a repair
- If you report an incident of anti-social behaviour or hate crime
- When you respond to a survey
- Complete an on-line form via the website such a general enquiry
- When you interact with us on social media
- When you email us
- When you speak to a member of staff, either face to face or over the telephone

Who we share your information with?

Your personal information will be kept secure and confidential. Our staff and volunteers have restricted access to personal information on a "need to know" basis.

We may share information with third parties, including contractors we work with such as our repairs and maintenance contractors, third party cloud hosting and IT infrastructure providers, agencies and authorities we work with, such as Local Authorities, Social Services, Police, and other social landlords.

Third parties are organisations we have a lawful basis to share your data with. These include:

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- Health and Social Care, such as local hospitals, GPs, social workers, clinical commissioning groups, and other health and social care professionals
- The Local Authority and DWP
- Organisations we have a legal obligation to share information with e.g. for Safeguarding, Regulator for Social Housing, the CQC and Ministry of Housing, Communities and Local Government (MHCLG) via the CORE (continuous reporting) system
- The police or other law enforcement agencies if we have to by law or court order
- Suppliers of contracted services, such as cleaning, gardening and property repairs

We may also share your data with your consent, such as with your family and friends.

Sometimes we have a legal duty to provide personal information to other organisations including:

- if the court orders that we provide the information; and
- in order to find and stop crime and fraud; or if there are serious risks to the public, our staff or to
- to protect a child or a vulnerable Adult; or there may also be rare occasions when the risk to others is so great that we need to share information straight away. If this is the case, we'll make sure that we record what information we share and our reasons for doing so. We'll let you know what we've done and why if we think it is safe to do so.
- We will not sell or rent your personal information to third parties. Where we share your information with third parties, we will ensure:
 - we provide only the information they need to perform their specific services.
 - they may only use your data for the exact purposes we specify in our contract with them.
 - we work closely with them to ensure that your privacy is respected and protected at all times.
 - if we stop using their services, your data held by them will either be deleted or rendered anonymous.

Transferring your data internationally

The personal information collected by Advance may be transferred to and stored in countries outside of the UK, although it is not our standard practice to do so. Whenever we arrange for

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international transfers of data overseas we will ensure the suitable arrangements are in place to provide suitable safeguards for the people whose information we transfer. When we appoint overseas data processors we check that suitable arrangements are in place such as United Kingdom Adequacy Regulations, EU Standard Contractual Clauses, or other permitted mechanisms.

Children's personal data

We do not usually process data on children aged under 18 that live in our properties, as all of our 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.

We may also receive children's information if we are involved in the housing and tenancy aspects of a welfare case, and/or as part of delivering support services as part of a multi-agency working solution.

Retention periods

We will normally retain your personal information for the period as necessary to maintain your tenancy and/or to provide you with the support services required, unless a longer retention period is required or permitted by law or necessary to defend legal claims. Retention periods are maintained within the Retention of Records Policy and the Record of Processing Activities and are available on request.

Your rights

Under data protection law, you have rights including:

- **Right of access:** You have the right to obtain confirmation from Advance as to whether personal data concerning you are being processed and, where that is the case, access to that data.
 - **Right to rectification:** You have the right to oblige Advance to rectify inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed by providing a supplementary statement.
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- **Right to erasure:** You have the right (under certain circumstances, but not all) to oblige Advance to erase personal data concerning you.
- **Right to restriction of processing:** You have the right (under certain circumstances, but not all) to oblige Advance to restrict processing of your personal data. For example, you may request this if you are contesting the accuracy of personal data held about you.
- **Right to data portability:** You have the right (under certain circumstances, but not all) to oblige Advance to provide you with the personal data about you which you have provided to Advance in a structured, commonly used and machine-readable format.
- You also have a right to oblige Advance to transmit those data to another controller.
- **Right to withdraw consent:** If the lawful basis for processing is consent, you have the right to withdraw that consent.
- **Right to object to direct Marketing:** Where your personal data are processed for direct marketing purposes, you have the right to object at any time to processing of your personal data for marketing, which includes profiling to the extent that it is related to such direct marketing.
- **Rights in relation to automated decision-making and profiling:** Advance does not perform any automated decision-making based on personal data that produces legal effects or similarly affects you.

You should note that some of these rights may not apply as they have specific requirements and exemptions which apply to them, and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Marketing

We may use your contact details to update you about the latest news and events in the following ways:

- **Email and text:** With your consent we will use your contact details, preferences and details of your services to keep you informed by email and text about relevant information and events.
- **Service communications:** We may send you certain communications, without your consent, if we are under a legal obligation to do so; if we feel sending the communication is in both yours and our interests; and/or it would be a disadvantage to you if we didn't send you the communication. These communications may include notifying you about changes to our terms or privacy notice, or asking you to provide feedback on our services

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and events.

You can opt out of our marketing communications at any time by clicking the “unsubscribe” link in any of our emails or by contacting data.protection@advanceuk.org.

Our website

In order to provide you with the best experience while using our website, we process some data about you. Users aged 16 and under must get consent from their parents or guardians before giving us personal information.

Our website may contain links to and from third party websites. Advance does not control these third-party sites. If you follow a link to any of these websites, please note that these websites have their own privacy notices which you should read and that we do not accept responsibility or liability.

Advance sites may also have ‘plugins’ (such as the Facebook ‘Like’ button) to third party sites or to offer login (such as log in with Facebook) through a third party account. Third party plugins and logon features, including their loading, operation and use, are governed by the privacy notice and terms of the third party providing them.

When you use our website we receive information from your web browser about how you use our website, including pages on our website you visit. The information includes your IP address (a unique identifier assigned to your computer) which does not identify you personally. We use this information to review and improve our website.

We may ask you to register on or log into certain areas of our website in order to provide you with a personalised experience of our website, such as to provide you with helpful information based on the details you have given us. If you use the ‘email a friend’ tool, we do not store your friend’s contact details.

If you have used our website to register or subscribe to a mailing list, please read those particular web pages or the emails you have received to find details about how to edit your information or unsubscribe from that particular mailing list. If you are an Advance customer and have a contract with us, we may not be able to remove your details or stop contacting you altogether.

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Cookies

Cookies make websites work better. They collect information about your usage, and we use them to help make your visits more effective.

Our website uses cookies to distinguish you from other users of our site. For detailed information on the cookies, we use and the purposes for which we use them, see Advance's Online Links and Cookie Statement and the Website Content Disclaimer available on our website. <https://www.advanceuk.org/links-and-cookie-statement>

CCTV and photographs

Some of our locations and offices have CCTV and you may be recorded when you visit them. CCTV is used to provide security and to protect our customers, staff, visitors and communities. CCTV will only be viewed when necessary and footage is stored for a set period of time.

Advance complies with the ICO's CCTV Code of Practice and we put up notices so you know when CCTV is used.

We may take photographs at our events, at our properties and in our communities to use for general marketing and publicity. However, photographs of individuals will only be used for those purposes with your consent, which is held within our Marketing, Communications & Customer Engagement team.

Your right to lodge a complaint with a supervisory authority

You also have a right to lodge a complaint with Information Commissioners Office (ICO) where you believe we have not complied with UK data protection law. In the first instance, we encourage you to resolve the matter with Advance. However, you can contact the ICO via www.ico.org.uk, casework@ico.org.uk or 0303 123 1113

How to contact us

For further information regarding your personal data or about Advance's approach to data protection in general please contact our Data Protection Officer at:

Advance Housing and Support Ltd

2 Witan Way,

Witney Oxon,

ADVANCE HOUSING AND SUPPORT LTD

OX28 6FH

(e) data.protection@advanceuk.org

(t) 0333 012 4307

Changes to our privacy notice

This privacy notice was updated in October 2024 and subsequently will be updated to reflect changes either to the way in which we operate or changes to data protection legislation. We will bring any significant changes to your attention but to make sure that you keep up to date, we suggest that you revisit this notice from time to time.

Version control

Version	Approved By	Date	Changes
2.0	Director of Finance & Technology	08.10.2024	Full update and refresh.