

Golding Homes

Privacy Policy



Data Controller: Golding Homes, Whatman House, St Leonard's Road, Maidstone, Kent ME16 0LS

Data Protection Officer: dpo@goldinghomes.org.uk

This privacy notice is to let you know how we handle your personal data under the GDPR.

Our Privacy Promise

Golding Homes promises:

- Never to sell your personal data.
- To be transparent about what we do with your personal data and keep you informed.
- To respond to any of your requests regarding your information in a timely and effective manner.

What information do we collect?

We collect information about you when you make an application to us or a request is made by you for one of our services. 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 course of the tenancy.

The table below sets out what personal data we process, our purpose for doing so and our lawful justification:

What personal data we process	Our purpose for doing so	Our lawful justification
Details about you and your children, including name, date of birth, address, contact details, identification (including National Insurance number), documents provided to us & employment details.	Allocating homes, managing our services, identifying you are who you say you are.	Performance of a contract, Legitimate Interest
Details about your home, household and your housing needs and tenancy agreement.	Allocating homes, managing our services, providing repairs.	Performance of a contract
Welfare benefit referrals, Housing benefit notifications, rent Statements, information regarding RentSense	Administration of the contract	Performance of a contract, legal obligation
Details about your home when you apply for shared ownership.	Allocating shared ownership homes.	Performance of a contract
Right to buy information	Records necessary for Right to Buy properties	Legal obligation, legitimate interest
Rent and service charge information, including details of any arrears.	Allocating homes, managing our services, making financial arrangements related to your home (setting up council tax payments), informing relevant local authority	Performance of a contract, legitimate interest

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	departments.	
Financial information, including any credit checks, income details, bank details, housing benefit information & any guarantor details.	<p>To make financial arrangements related to your home, such as to enable automatic rent payment through direct debit or housing benefit payments, set up your council tax payments or deal with any mortgage arrangements;</p> <p>To set up arrangements relating to your home, such as informing the Local Authority departments of your tenancy arrangements for council tax and housing benefit purposes</p> <p>To help other people or companies to provide services or utilities to your home or to contact you. This may include where they need to contact you when you first move in to set up payments or about any unpaid bills while you live at your home and/or after you leave your home.</p>	Performance of a contract, Legal Obligation, Legitimate Interest
References received about you (e.g. from your employer or previous landlord). Is this for customers or employee related?	Allocating homes, managing our services, administration	Performance of a contract
Medical information & emergency contact details, next of kin & any advocate, Information about any accidents or incidents which involve you or your home.	<p>To provide information to our staff to enable them to provide services to you to meet your needs and to train and protect them where necessary;</p> <p>To deal with any medical or other emergencies and to carry out your wishes or Requirement's such as any religious or cultural wishes;</p> <p>To act in someone's best interests such as where we have concerns about a person's health or welfare and may need to involve agencies such as Social Services or the police;</p>	Explicit Consent, Social Protection Law or Protecting Vitals Interests in extreme circumstances.
Information about any complaints made by you or which relate to you.	To handle any complaints.	Legitimate Interest, Legal Obligation.
The way in which you conduct your tenancy if you are in breach of your tenancy conditions	To respond to breach of our tenancy conditions.	Legitimate interest, contract.
Information regarding your	To deliver marketing materials such	Consent

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marketing preferences.	as our newsletter or make note of particular preferences.	
Any photographs taken of you or your property.	Monitoring defects, assessing any health & safety risks, administering tenancies and security.	Legitimate Interest
Any marketing materials/photos taken at events.	To promote our services.	Your Consent
Ethnicity data, Sexual Orientation and Religious Beliefs	To ensure fair and equal access for all to our services; To help us put together statistics to give to our regulator or other government organisations.	Explicit Consent for Equal Opportunities Monitoring
Convictions, proceedings and criminal acts	To respond to legal claims, to deliver our services, safeguarding, The apprehension or prosecution of offenders.	Performance of a contract, social protection law, legal obligation, employment law, prevention and detection of crime
Call Recordings	To improve our services.	Legitimate Interest
CCTV footage	For the prevention and detection of crime.	Legitimate Interest

If we deem there to be a risk to the safety of individuals, we may place a flag over your tenancy. When we do so, we will inform you and ensure that these flags are regularly reviewed.

Data Retention

For more information regarding how long we hold your personal data, please follow the link to our [Retention Schedule](#), detailing how long we keep all items of information at Golding Homes beyond those listed above.

Our Legitimate Interests

A legitimate interest means that we need to process information necessary for Golding's business or commercial interests. When we rely on any legitimate interest, we will ensure that we take a balanced approach and have appropriate safeguards in line with your expectations. If we rely on any legitimate interest, we will tell you what that is.

Our legitimate interests include:

- Having appropriate security, for our offices and on our sites. This includes CCTV and identification photographs.
- Handling and investigating complaints.
- Keeping our records up to date.
- Collecting unpaid debt.
- Recording threatening behaviour.
- Official Communications.

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- Keeping our records up to date, working out which of our products and services may interest you and telling you about them.
- Seeking your consent when we need it to contact you.
- Sharing your information with local utilities providers in the event of unpaid debts.

How will we collect this information?

Information will be collected from you personally when you enter into an agreement / contract with us. This will be in the form of applications and any other forms which may be completed in order to apply for one of our properties.

It is possible that we will receive referrals containing your information from public bodies such as local councils, but this should be done with your consent and knowledge of why they are making the referral to our services.

We may generate further personal data regarding our tenants during the course of the tenancy. This could be in the form of general correspondence, or this may need to be generated to satisfy our statutory obligations. An example of Golding Homes fulfilling its statutory obligations and potentially collecting personal data would be where photographs of properties are required for the purposes of monitoring defects or for assessing any health & safety risks.

Who will we share it with?

Where information is used for the reasons listed above, we may need to share the information about you and the people you live with other organisations. This will include:

Who we share your information with	The purpose for sharing it	Our justification for sharing
Companies which provide services or utilities to your home (such as the gas, electric or water board) and the relevant Council Tax Department.	Payment of these services	Legitimate Interest, Legal Obligation.
People who provide services on our behalf, such as a managing agent or contractors carrying out any repairs.	Fulfilling the tenancy agreement	Performance of a contract
A credit checking agency, your bank and mortgage company or other financial institutions and (where necessary) a debt collection and/or tracing agency.	Allocating and administering properties and tenancy agreements.	Performance of a contract. Where debt collection agencies are involved, this will be in our legitimate interest.
The Housing Benefit department and other Government departments which provide funding for your housing or care/support services. In particular, we may be legally required to give information about any changes in your financial circumstances to the Housing Benefit department.	Legal requirement.	Legal obligation.
Resident representatives and board members involved in our complaints process.	To improve our services	Legitimate Interest

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A doctor, hospital, paramedic or health worker.	Where you require medical attention and are unable to provide the information yourself.	Your consent, in line with Social Protection Laws, Amendment 85
Our legal advisors, the courts and the police. This may include information about antisocial behaviour.	Reducing ASB and fraud, the prevention and detection of crime.	Handling legal claims
People or agencies who provide services to you or who work with us to provide services to you, such as your care/support provider.	To deliver services	Performance of a contract
The bodies involved with your care/support such as the relevant Local Authority departments, or Social Services and any alarm call centre.	To deliver services	Performance of a contract, legal obligation
Our regulator or other bodies which look at how we provide services as your landlord & other people where we are legally required to provide information to them.	Legally required	Legal obligation
Your next of kin or other people acting on your behalf in an emergency and a member of your church or religious leader, where you have requested this.	When the information is requested	Consent
To another landlord or housing association where you are looking to move or exchange your property (e.g. where they request your details &/or a reference from us).	When the information is requested	Consent
Relevant Local Authority departments (including housing benefit, council tax, elections, adult services, fraud teams etc.)	Legal requirement	Legal obligation
To relevant people and authorities such as the police, adult and child protection and social services.	Social Protection, Prevention and Detection of Crime.	Social Protection law, the Prevention and Detection of Crime.
Companies who process information on our behalf such as an external mailing company (who send out our newsletter), our archiving company, our confidential waste disposal company. Providers of our information technology services or software.	To enhance and deliver our services, maintaining records.	Legitimate Interest.

International Transfers

Golding Homes will not transfer your information outside of the European Economic Area without adequate safeguards. Golding Homes does not transfer any personal data internationally, besides information transferred to SurveyMonkey and Mailchimp, which are both covered by the Privacy Shield.

If Golding Homes were to transfer any personal data internationally, this will be in line with our internal procedure and the terms in this privacy notice will be updated.

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Keeping your information secure

We store personal information both electronically and in paper form.

We implement security policies, processes and technical security solutions to protect the personal information we hold from:

- Unauthorised access
- Improper use or disclosure
- Unauthorised modification
- Unlawful destruction or accidental loss

When you contact us, we may ask you to provide us with some information so that we can confirm your identity. If other people (e.g. family members, support workers, solicitors) act on your behalf we will take steps to ensure that you have agreed for them to do so. This may include asking them to provide us with supporting information to indicate your consent. We do this to protect you and to make sure that other people cannot find things out about you that they are not entitled to know.

Employees and third parties who have access to, or are associated with the processing of your personal information, are obliged to make reasonable efforts to safeguard it.

Automated Decision Making and Profiling

We do not make any decisions about you using automated means and we do not envisage this changing in the near future. If the situation does change, we will notify you in writing.

Golding Homes does carry out profiling in the form of RentSense by Mobysoft in order to help facilitate rent payments and assist in the performance of the contract. To quote the RentSense website:

“RentSense is a series of complex algorithms that analyse a housing organisation’s tenants’ transactional history, which is coupled with a predictive analytical application that then predicts which tenants will and won’t pay their rent. It then produces a list of tenants, in priority order, that need contacting that week regarding their rent.”

Marketing

We maintain a newsletter which we periodically send to tenants, containing useful news and information regarding events and relevant news to all those who sign up to our services.

We also ask for people’s consent to market information using our standard consent forms. Further direct marketing may be conducted by post or by telephone (provided you are not on the Telephone Preference Service) under our legitimate interests.

We may carry out surveys from time to time, including those carried out by external organisations on our behalf. This will be based on our legitimate interests.

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If you do not wish to receive marketing material, or you would like to edit your preferences, please contact us. Unsubscribe options will also be offered on all emails.

Please note, opting out of marketing does not remove the ability for Golding Homes to contact you regarding the delivery of your contract of tenancy

Visiting our websites

When you visit one of our websites, we collect standard internet log information for statistical purposes.

- We use cookies to collect information in an anonymous way, including the number of visitors to the site, where visitors have come to the site from and the pages they visited. To find out more about how we use cookies please see our [cookies notice](#)
- We do not make any attempt to identify visitors to our websites. We do not associate information gathered from our sites with personally identifying information from any source.
- When we collect personal information, for example via an online form, we will explain what we intend to do with it on the form

Our websites contain links to various third party websites. We are not responsible for the content or privacy practices of any external websites that are linked from our sites.

Applying for a job

If you submit an application to work for Golding Homes, we will use your personal information to process your application and to produce and monitor recruitment statistics. We will not take up references without your prior permission. We will not share or disclose your information unless you have given us your consent or we are required to by law. Where we are required to carry out a Disclosure and Barring Service (DBS) check we will comply with the law and your rights when carrying out these checks.

We retain personal information relating to unsuccessful applicants for no longer than 12 months.. We produce statistical information to assist with recruitment analysis.

Changes

We will notify you of any changes to this privacy policy.

Access to your information and correction

You have the following rights regarding your personal data:

Right available	Description of right
Right to be informed	Individuals have the right to be informed about the collection and use of their personal data.
Right of access	You have the right to obtain confirmation from Golding Homes as to whether or not personal data concerning you are being processed, and, where that is the case, access to that personal data.

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Right to rectification	You have the right to oblige Golding Homes 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.
Right to erasure (right to be forgotten)	You have the right (under certain circumstances, but not all) to oblige Golding Homes to erase personal data concerning you. This will never include current tenancy details as necessary to fulfil our contractual obligations, or any information we are required to process under law.
Right to restriction of processing	You have the right (under certain circumstances, but not all) to oblige Golding Homes 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 Golding Homes to provide you with the personal data about you which you have provided in a structured, commonly used and machine-readable format. You also have the right to oblige Golding Homes to transmit that data to another controller.
Right to withdraw consent	If the lawful basis for processing is consent, you have the right to withdraw that consent. If you wish to withdraw your consent, contact us immediately.
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	Golding Homes does not perform any automated decision-making based on personal data that produces legal effects or similarly significantly affects you.

Golding Homes is not a scheduled body under the Freedom of Information Act and therefore does not have to respond to any requests under the Act.

For more information about any of your rights, please visit:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

Contacting Us

Please contact us if you have any questions in relation with this notice or the information we hold about you:

by email: enquiries@goldinghomes.org.uk

by phone: 0300 777 2600

by post: Whatman House, St Leonards Road, Maidstone ME16 0LS

by social media: [Facebook](#) and [Twitter](#)

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If you are not satisfied with the response you receive you have the right to lodge a complaint with the supervisory authority and the right to judicial remedy. In the United Kingdom this is:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

(t) 0303 123 1113

(e) casework@ico.org.uk

This privacy policy was last updated 16/05/2018