

Privacy Notice

How we collect, use and protect your personal information

Data Controller

Saffron Housing Trust Ltd and its subsidiaries:

- Crocus Homes Ltd
- Saffron Housing Finance Plc
- Crimson Development Homes Ltd

Saffron Barn, Swan Lane, Long Stratton, Norwich, Norfolk NR15 2XP

Email: DPO@saffronhousing.co.uk | Tel: 01508 532000

1.0 At a glance

This notice explains how Saffron Housing Group ("we", "us") collects, uses, shares and protects your personal information. It applies to tenants, applicants, leaseholders, shared owners, contractors, visitors and anyone else whose data we process.

We are the data controller under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018).

What	Summary
Who we are	A housing association based in South Norfolk managing over 6,500 homes across Norfolk, Suffolk and East Anglia.
Why we use your data	To manage tenancies and services, meet legal obligations, and improve what we offer.
Who we share it with	Contractors, legal advisers, regulators, and statutory bodies where permitted or required by law.
How long we keep it	Varies by data type. Most tenancy records are kept for 6 years after the tenancy ends. See Section 7 for full retention periods.
Your rights	Access, correction, erasure, restriction, portability, objection and complaint. See Section 9.
Contact the DPO	DPO@saffronhousing.co.uk 01508 532000

2.0 Personal Data we collect

The categories of data we collect depend on your relationship with us. The main categories are set out below.

2.1 Tenancy and housing services

We collect this data to enter into and manage your tenancy contract and to provide the services you are entitled to under it. The lawful basis is contract performance (Article 6(1)(b) UK GDPR).

- Full name, date of birth and proof of identity
- Contact details (address, telephone, email)
- Emergency contact details
- National Insurance number
- Income, expenses, benefit and Council Tax information
- Bank or payment card details for rent payments or Direct Debit
- Details of all occupants, including their relationship to you
- Contact details for anyone authorised to act on your behalf

Where relevant to the assessment of housing need or tenancy management, we may also collect the following special category data (Article 9(2)(b) and (g) UK GDPR; Schedule 1, paragraphs 1 and 6, DPA 2018):

- Health information, disabilities or vulnerabilities
- Ethnicity

2.2 Homeownership, leasehold and shared ownership

Where you are a leaseholder or shared owner, or you are buying all or part of a property from us, we process data to manage ownership and transactions.

This includes:

- Lease or shared ownership details
- Staircasing and sales information
- Financial and affordability information
- Information shared with solicitors, valuers, Estate Agents and mortgage providers

Lawful basis: Contract (Article 6(1)(b)), Legal obligation (Article 6(1)(c))

2.3 Telephone Communication records

We record inbound and outbound telephone calls to our contact centre for training, monitoring and quality purposes. Lawful basis: legitimate interests (Article 6(1)(f) UK GDPR). Recordings are retained for three months unless required for an ongoing complaint or legal matter.

2.4 CCTV

CCTV is in operation at Saffron-owned and shared premises for the prevention and detection of crime. Lawful basis: legitimate interests (Article 6(1)(f) UK GDPR). Footage is retained for 30 days unless required for legal proceedings. A separate CCTV Policy is available on request.

2.5 Photography

We use photographs to evidence anti-social behaviour, tenancy breaches and property maintenance matters. Lawful basis: legitimate interests (Article 6(1)(f) UK GDPR).

Where we photograph individuals at events, we will ask for your written consent first (Article 6(1)(a) UK GDPR). You may withdraw consent at any time by contacting us.

2.6 Website, digital services and cookies

When you use our website, tenant portal, feedback forms or surveys, we collect information to manage your account and improve our services. Lawful basis: legitimate interests (Article 6(1)(f) UK GDPR). Data is retained for 6 years.

Our website uses cookies. Non-essential cookies (including analytics tools such as Google Analytics) are set only with your consent. You can manage your cookie preferences at any time via the cookie settings link on our website. For full details see our Cookie Policy.

2.7 Special Category data

Health information, disabilities, vulnerabilities and ethnicity are special category data under Article 9 UK GDPR. We process this data under the following conditions:

- Article 9(2)(b) — processing necessary for employment, social security or social protection law obligations
- Article 9(2)(g) — substantial public interest (provision of social housing to persons in need), relying on Schedule 1, paragraph 18, DPA 2018
- Article 9(2)(h) — provision of social care (where applicable to specialist or supported housing)

We only collect and use special category data to the extent necessary for the specific purpose and we apply additional access controls to records containing this information.

2.8 Equity, diversity and inclusion (EDI) Information

We may ask you to provide information about your equality characteristics, such as ethnicity, religion, disability, sexual orientation or other protected characteristics.

We collect this information to help us:

- meet our equality duties and regulatory requirements
- understand the needs of our residents and improve our services
- monitor fairness and prevent discrimination

Providing this information is entirely voluntary. You can choose not to answer these questions or select “prefer not to say”, and this will not affect your application, tenancy or access to services.

The lawful basis for processing is our legitimate interests (Article 6(1)(f) UK GDPR).

Where the information constitutes special category data, we rely on Article 9(2)(g) (substantial public interest), and Schedule 1 of the Data Protection Act 2018 (equality of opportunity or treatment).

2.9 Children’s data

Where children live at one of our properties we record their name, date of birth and gender for tenancy management and overcrowding prevention. Lawful basis: contract performance and legal obligation (Article 6(1)(b) and (c) UK GDPR). We may also receive information about children through multi-agency safeguarding partnerships; in those cases, the lawful basis is substantial public interest (Article 9(2)(g) UK GDPR; Schedule 1, paragraph 18, DPA 2018). This data is retained for 6 years after the tenancy termination

2.10 Financial Support, grants and assistance

We offer financial support, grants and practical assistance to eligible residents. This may include support such as household items, garden maintenance, or one-off financial awards.

When you apply for this support, we will collect and assess information to determine eligibility and ensure that support is allocated fairly and appropriately. This may include:

- Financial and affordability information (such as income, expenditure and benefits)
- Details about your circumstances, including any vulnerabilities
- Health information or disabilities where relevant to support needs

We use this information to assess eligibility for grants or support and ensure decisions are fair, consistent and evidence based.

The lawful basis is Legitimate interests (Article 6(1)(f) UK GDPR). Where we process special category data (such as health information), we rely on Article 9(2)(g) UK GDPR — substantial public interest, and

Schedule 1, Part 2, paragraph 18, Data Protection Act 2018 (safeguarding of individuals at risk), or paragraph 8 (equality of opportunity or treatment), where applicable.

Providing this information is necessary for us to assess your application. If you choose not to provide relevant information, we may not be able to process your application or award support.

2.11 Recruitment

We collect and process personal data submitted during the recruitment process in order to assess suitability for employment and to manage the recruitment and selection process.

Processing is carried out under Article 6(1)(b) UK GDPR (steps prior to entering into a contract) and, where applicable, Article 6(1)(c) (legal obligation) and Article 6(1)(f) (legitimate interests).

3.0 How we obtain your data

We collect data directly from you at the point of application or during your tenancy. We may also receive data from:

- Your local council or housing authority
- Previous landlords
- The police or welfare services
- The Department for Work and Pensions or other benefit providers
- Elected representatives (councillors or MPs) acting on your behalf
- Survey providers or research partners who collect tenant feedback on our behalf (including Tenant Satisfaction Measures required by the Regulator of Social Housing)
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4.0 How we use your personal data

Purpose	Lawful basis	Applies to
Letting and managing your tenancy	Contract (Art. 6(1)(b))	Tenants, applicants
Providing repairs and maintenance	Contract (Art. 6(1)(b)) / Legitimate interests (Art. 6(1)(f))	Tenants
Providing lifeline and specialist services	Contract (Art. 6(1)(b))	Older / vulnerable residents
Complying with legal obligations (e.g. Right to Rent, safeguarding)	Legal obligation (Art. 6(1)(c))	All
Preventing and detecting crime (CCTV, incident records)	Legitimate interests (Art. 6(1)(f))	All visitors and residents
Debt recovery and legal proceedings	Legitimate interests (Art. 6(1)(f)) / Legal obligation (Art. 6(1)(c))	Tenants with arrears
Responding to complaints and enquiries	Legitimate interests (Art. 6(1)(f))	All
Reporting to the Regulator of Social Housing (RSH) and other regulators	Legal obligation (Art. 6(1)(c))	All
Property purchase and development (solicitors, surveyors, valuers)	Contract (Art. 6(1)(b)) / Legal obligation (Art. 6(1)(c))	Shared owners, leaseholders

Monitoring service quality and tenant satisfaction (including Tenant Satisfaction Measures required by the Regulator of Social Housing)	Legal obligation (Art. 6(1)(c)) and/or legitimate interests (Art. 6(1)(f))	Tenants
Assessing eligibility for financial support, grants and tenancy sustainment assistance	Legitimate interests (Art. 6(1)(f))	Tenants and applicants
Collect and process personal data submitted during the recruitment process	under Article 6(1)(b) UK GDPR (steps prior to entering into a contract), Article 6(1)(c) (legal obligation), Article 6(1)(f) (legitimate interests)	Candidates / applicants

Where we rely on legitimate interests, we have carried out a balancing test to ensure our interests are not overridden by your rights and freedoms.

5.0 Who we share your data with

We do not sell your personal data or share it with third parties for marketing purposes. We share data only where necessary and have data sharing or processing agreements in place with all third-party recipients.

Recipients may include:

- Repair and maintenance contractors carrying out work on our properties
- Out-of-hours contact centre providers
- Legal advisers, solicitors, court agents and property valuers
- Debt collection and tracing agents (where there are rent arrears)
- The Regulator of Social Housing (RSH), auditors and other statutory regulators
- Utility companies, local councils and housing authorities
- The police, welfare services or safeguarding bodies where required by law
- The Department for Work and Pensions and benefit providers

All third-party processors are required to comply with UK GDPR and our data protection standards. We do not transfer your personal data outside the United Kingdom except where adequate protections are in place in accordance with UK GDPR Chapter V.

6.0 How long we keep your data

We retain personal data only for as long as is necessary. Our main retention periods are:

Data category	Retention period
Tenancy records (all documents)	6 years after tenancy ends (or longer if legal proceedings are outstanding)
Rent account and financial records	6 years from last transaction
Application and pre-tenancy records (unsuccessful)	2 years from decision
Complaint and legal correspondence	6 years from resolution
Telephone call recordings	3 months (longer if subject to complaint or legal proceedings)
CCTV footage	30 days (longer if required for investigation or legal proceedings)
Event photographs (consent-based)	3 years or until consent withdrawn
Incident photographs (evidence)	6 years or until legal proceedings conclude
Children's data	6 years after the child reaches 18, or 6 years after tenancy ends — whichever is later
Survey and feedback data	6 years from collection
Website / portal data	6 years from last activity

The retention periods above are a summary of our key records. We maintain a detailed Records Retention Schedule covering all document and data types and their associated retention periods.

7.0 How we protect your data

We maintain technical and organisational security measures appropriate to the risk, including:

- Restricted access controls — data is accessible only to staff who need it
- Encrypted storage and secure transmission of personal data
- Regular staff training on data protection and information security
- Contracts with all third-party processors requiring equivalent security standards

In the event of a personal data breach that is likely to result in a risk to your rights and freedoms, we will notify the Information Commissioner's Office (ICO) within 72 hours and inform you without undue delay if the breach poses a high risk to you.

We do not transfer or store your personal data outside the United Kingdom unless adequate protections are in place under UK GDPR Chapter V.

8.0 Your rights

Under UK GDPR you have the following rights. To exercise any of them, please contact our DPO at DPO@saffronhousing.co.uk or write to us at the address on page 1.

Right	What it means
Right to be informed	To know how and why we process your data — this notice fulfils that obligation.
Right of access (SAR)	To receive a copy of the personal data we hold about you. We will respond within one month of receiving your request (and valid identity verification where we have reasonable doubt about your identity). No fee is normally charged.
Right to rectification	To have inaccurate data corrected or incomplete data completed without undue delay. We will also notify any third parties we have shared the data with.
Right to erasure	To request deletion of your data where it is no longer needed, where you withdraw consent, or where it has been unlawfully processed. This right does not apply where we are required to retain data by law or for legal claims, or where rent arrears or active legal proceedings are outstanding.
Right to restrict processing	To ask us to pause processing while, for example, we verify the accuracy of the data or consider your objection. We will tell you before any restriction is lifted.
Right to data portability	To receive data you provided to us (processed by automated means on the basis of consent or contract) in a structured, machine-readable format, or to have it transferred to another controller where technically feasible.
Right to object	To object to processing based on legitimate interests. We will stop unless we can demonstrate compelling legitimate grounds that override your rights, or where processing is necessary for legal claims.
Automated decision-making	We do not currently make decisions about you solely by automated means. Should this change, we will update this notice and ensure appropriate safeguards are in place.
Right to lodge a complaint	You have the right to complain to the ICO at any time if you believe we have not handled your data lawfully. See Section 11 for ICO contact details.

Identity verification for Subject Access Requests: We may request proof of identity before processing your request to ensure personal data is not disclosed to the wrong individual. Where

we are unable to reasonably verify your identity, we may pause the processing timeframe until sufficient information is provided. The statutory response period will resume once identity has been satisfactorily confirmed.

Consent: Where we process your personal data based on your consent, you have the right to withdraw that consent at any time.

9.0 Automated Decision-Making and Profiling

We do not currently use solely automated decision-making processes (including profiling) that produce legal or similarly significant effects on you, as described in Article 22 of the UK GDPR.

Should we introduce such processes in the future, we will update this notice and inform you of your rights in relation to those decisions.

10.0 How we communicate with you

We will usually contact you by letter, telephone, email or text message. All tenants receive our newsletter as part of our regulatory obligations to keep residents informed and involved. To opt out, contact:

- Email: communications@saffronhousing.co.uk
- Telephone: 01508 532000
- Post: Saffron Barn, Swan Lane, Long Stratton, Norwich, Norfolk NR15 2XP

We will only discuss your personal information with people named on your tenancy agreement, or with those you have authorised in writing (permanently) or verbally over the phone (temporarily).

11.0 Contact us and how to complain

Our Data Protection Officer

Mr S Howlett

DPO@saffronhousing.co.uk

01508 532000

Saffron Barn, Swan Lane, Long Stratton, Norwich, Norfolk NR15 2XP

Information Commissioner's Office (ICO)

If you are unhappy with how we have handled your personal data, or with our response to a request made under data protection legislation, you may ask us to review our decision or handling of your request.

To do this, please contact our Data Protection Officer using the contact details provided above, setting out the reasons for your concern. We will investigate the matter and provide a response in accordance with our review process.

If, following our review, you remain dissatisfied with our response, you have the right to complain to the Information Commissioner's Office (ICO):

Website: www.ico.org.uk

Telephone: 0303 123 1113 **Post:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

12.0 Update to this notice

We review this notice at least annually and whenever there is a material change to how we process personal data. The current version is always available on our website at www.saffronhousing.co.uk. Where changes are significant, we will notify affected data subjects directly.

This notice was last reviewed in July 2026 and replaces all previous versions.

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