

## 1. Introduction

We take your privacy seriously. You can find out more in this document about your privacy rights, and about how we collect, use, share and protect your personal information. This includes the information we already hold about you, and the further personal information we might collect about you, either from you directly or from a third party. How we use your personal information will depend on the products and services we provide to you.

This Privacy Notice is a public document, available to anyone when Saffron Housing Trust and/or its subsidiaries (Crocus Contractors Ltd, Saffron Housing Finance Plc, Crimson Homes Development Ltd) obtains and uses their personal information. It explains how we and third-party organisations or people appointed by us use your personal information, and it details your rights.

## 2. Who we are

We are a housing association based in South Norfolk with over 6,500 homes in Norfolk, Suffolk and across East Anglia. Our 200+ employees are committed to providing quality homes and services to our tenants, offering affordable homes for those in housing need and specialist homes for older and vulnerable adults.

Read more about Saffron Housing Trust's strategy for Inspiring Community, Inspiring Trust and being an Inspiring Organisation:

### [About Us - Saffron Housing](#)

Saffron Housing Trust is subject to the regulation of the RSH (Regulator of Social Housing). The objectives of the Regulator are set out in the Housing and Regeneration Act 2008. RSH regulates private registered providers of social housing to promote a viable, efficient and well-governed social housing sector able to deliver homes that meet a range of needs. RSH perform their functions in a way that minimises interference and is proportionate, consistent, transparent and accountable.

This Privacy Notice also covers the following subsidiaries of Saffron Housing Trust:

Crocus Contractors Ltd.

Saffron Housing Finance Plc

Crimson Homes Development

### 3. What information we process:

#### **Calling our telephone number**

We may record inbound and outbound telephone. These calls are recorded for training and monitoring purposes. We normally keep the recordings for a period of three months. We have legitimate interest to record these calls.

#### **CCTV**

CCTV is in operation at our Saffron owned locations and shared premises for the detection and prevention of crime. We keep the recordings for a period of 30 days or longer if required for legal proceedings. We have legitimate interest to record this data.

#### **Photography and sound recording**

We use photographs to capture evidence of anti-social behaviour, breaches in tenancy agreements and for the use of property maintenance. We have a legitimate interest to record this data.

We also sometimes take photographs of individuals attending our events but these photographs will only be used with written consent.

We process this data with your Consent. You have the right to withdraw that consent at any time.

#### **Our Website**

We operate customer portals, feedback and complaints on our website. We keep this information to manage our account and process your feedback.

We may also ask you to complete a survey.

We process this data to help us provide a better service to our tenants and do so as our legitimate interest. We keep this data for 6 years.

#### **Cookies**

Our website uses cookies to help the site provide a better user experience. In general, cookies are used to retain user preferences, store information for things like shopping carts, and provide anonymised tracking data to third party applications like Google Analytics.

We process this data with your Consent. You have the right to withdraw that consent at any time.

As a rule, cookies will make your browsing experience better. However, you may prefer to disable cookies on this site and on others. The most effective way to do this is to disable cookies in your browser. We suggest consulting the help section of your browser or taking a look at the About Cookies website which offers guidance for all modern browsers.

## Tenancy Service

As part of our lettings process and ongoing tenancy management we may require the following information. We may also ask for some of these identifying details for other services we offer. This data will be kept for 6 years after the tenancy has ended.

We process this data as part through the contract between you and Saffron Housing

- Full name
- Proof of your identity
- Income and expenses
- Date of birth
- National Insurance number
- Ethnicity
- Contact details
- Emergency contact details
- Benefit and Council tax information
- Details of people who will live in the property with you.
- Banking or payment card details if you make payments to us
- Contact details who people who can act on your behalf
- If you choose to pay your rent by Direct Debit we will need your bank details
- GP contact details
- The information we may collect from you includes:
  - Disabilities, vulnerabilities or health information

## 4. Communicating with third parties

We may also collect information about you if you apply for a property including information from.

- Your local council or housing authority.
- Past landlords.
- The police or welfare services.

- The Department of Work and Pensions or other benefit providers
- Councillors
- MPs

## 5. Children

If there are children living at the one of our properties with you, we will record their name, date of birth and gender. We require this information for tenancy management, and to prevent overcrowding.

We may also receive children's information through a third party if we are working within a multi-agency partnership. It is our legal obligation to keep this data for 6 years

## 6. Sharing your data

Saffron Housing Group has in place data sharing and processing agreements. These are required under the General Data Protection Regulation when we share any personal data. For example we will sometimes use contractor services to provide out of hours contact services or to carry out planned or emergency repairs to our properties. These contractors comply with our data sharing and processing agreements. This agreement includes a requirement to comply with the General Data Protection Regulation. To help improve the services we provide to you, Saffron Housing or a contracted third party may contact you for your feedback.

We process this data as our Legitimate Interest.

Saffron Housing Group may need to share personal information with regulating authorities, auditors, utility companies, the police, local councils or other organisations where we are legally allowed or required to do so.

We process this data as our Legitimate Interest.

In the event of a property purchase we may also need to share your information with our appointed solicitors, property valuation agents or surveyors and court agents.

We may also need to collect additional information such as bank statements or income details, including payslips. We process this data as our Legitimate Interest.

## 7. Tenancy, customer and property Information

Saffron Housing Group have internal IT systems that help with the management of our properties and lifeline services. This enables us to deliver our services to you.

We process this data as part through the contract between you and Saffron Housing and to fulfil essential services to you

## 8. What we do with the information we collect

Saffron Housing Group will keep all information concerning a tenancy or lease agreement for the term of the agreement and for a period of 6 years afterwards. Saffron Housing Group has a legal obligation within our contract with you for processing your information.

We will sometimes invite you to take part in a survey or research to help improve our service to you or the conduct statistical analysis. We process this data with your Consent. You have the right to withdraw that consent at any time.

The information we collect is stored on our IT systems, and in some cases in paper format, within one of our Saffron Offices. We maintain the utmost security, integrity and accountability while ensuring the efficient running of our business. These IT systems are continuously maintained at the highest level following the very best security principles.

Saffron Housing Group is committed to be accountable for your personal information. As part of that commitment, we will not;

- send you unsolicited marketing material
- sell your personal data
- pass on your personal data to unrelated third parties unless we are allowed or required to do so by law
- transfer or store your personal data outside of Europe (the European Economic Area) outside of the control of the UK / European regulations

## 9. How we will communicate with you

When Saffron Housing Group needs to communicate with you it will usually be in writing or by telephone, text, email.

All of our tenants receive our newsletters with information about what is going on within the organisation. We are required by our regulator to keep our tenants informed and to offer opportunities for involvement, but you may opt-out of receiving this by contacting [communications@saffronhousing.co.uk](mailto:communications@saffronhousing.co.uk), calling our main number 01508 532000 or writing to Saffron Housing Trust Ltd, Saffron Barn, Swan Lane, Long Stratton, Norwich, Norfolk, NR15 2XP

We will only discuss or communicate any personal details with those named on an agreement or those authorised (temporarily or permanently) by you. You can authorise someone temporarily verbally over the phone or permanently in writing.

## 10. Your Rights

The GDPR has replaced the Data Protection Act 1998, giving more rights to you as an individual and more obligations to organisations holding your personal data.

We will ask you to provide identification if you make a subject access request. We need a copy of your passport, birth certificate or driving licence and a utility bill or something with your address on it. You must only send copies and not originals. We ask for these to protect yours and other peoples data.

We will normally complete your request in one month following receipt of identification, but can extend that for an additional two. You can request the format you receive this data in which is either electronically or paper. There is normally no charge to provide you with this data.

We have retention periods for all the data we hold. This retention period can be different depending on the type of data and if there are any rent arrears or on-going legal claims. We will tell you what these retention periods are.

## 11. What are your rights

- Right to be Informed
- Right of Access
- Right to Erasure (to be forgotten)
- Right to rectification (to be corrected)
- Right to portability
- Right to restrict processing
- Right to object
- Right to object to automated decision making

## 12. An explanation of your rights

### Right to be Informed

We will give you access to our privacy notice through our website and when you sign up to a tenancy or other service we provide, explaining how and why we process your data. We can also explain this to you over the phone.

The privacy notice will tell you;

- we are the data controller
- what our legal basis is for processing your data and what we will use it for
- who we share this with
- How long we will keep the data
- Who our Data Protection Officer is and their contact details
- If we do any automated decision making
- Any source and category of data if you haven't provided it to us

When doesn't this right apply;

- If you already have this information and you are just updating your details
- If it would be impossible or involve disproportionate effort

### Right of Access

You have the right to obtain from Saffron Housing confirmation as to whether or not personal data concerning you is being processed, and, where that is the case, access to the personal data and the following information:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- where the personal data are not collected from the data subject, any available information as to their source;
- the existence of any automated decision-making, including profiling, at least in those cases, meaningful information about the logic involved,

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  - as well as the significance and the envisaged consequences of such processing for the data subject.

This applies to any personal data that we hold for you as an individual.

When doesn't this right apply:

- Once the retention period is met and if there are no rent arrears or on-going legal claims, the data is deleted and is not subject to this request
- We can refuse this request or ask for a payment if the request is manifestly unfounded or excessive, in particular because the request is repetitive
- We can refuse this request if it will adversely affect the rights and freedoms of others

## **Right to Erasure (to be Forgotten)**

You have the right to request from Saffron Housing the erasure of personal data concerning you without undue delay and Saffron Housing has the obligation to erase personal data without undue delay where one of the following grounds applies

- the personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed
- where you withdraw consent on which the processing is based
- where you object to the processing and there are no overriding legitimate grounds for the processing
- your data has been unlawfully processed
- Consent was given by your parents or guardian when you were below the age of 16

When doesn't this right apply:

- there are compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims
- to exercise the right of freedom of expression and information
- to comply with a legal obligation
- for the performance of a task carried out in the public interest or in the exercise of official authority
- for archiving purposes in the public interest, scientific research, historical research or statistical purposes where erasure is likely to render impossible or seriously impair the achievement of that processing
- if there is outstanding money owed to Saffron Housing by the requestor
- there is outstanding legal action against the requestor by Saffron Housing

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## Right to rectification (Right to have data corrected)

You have the right to request Saffron Housing to, without undue delay, the rectification of inaccurate personal data concerning you. You also have the right, taking into account the purposes of the processing, to have incomplete personal data completed, including by means of providing a supplementary statement and adding it to the data. If your data is incorrect we will correct it without delay.

If we have shared the data with a third party, we will instruct them to correct the data.

## Right to portability

You have the right to receive the personal data concerning you, which you have provided to Saffron Housing, in a structured, commonly used and machine-readable format and have the right to transmit that data to another data controller without hindrance from Saffron Housing. We will transmit the data directly where it is technically feasible.

You can request to:

- receive a copy of your personal data; and/or
- have your personal data transmitted from one controller to another controller

When doesn't this right apply:

- if the request is manifestly unfounded or excessive, taking into account whether the request is repetitive in nature
- If the data has reached its retention period and has been deleted

## Right to restrict processing

You have the right to obtain from Saffron Housing restriction of processing where one of the following applies:

- the accuracy of the personal data is contested by you, for a period enabling Saffron Housing to verify the accuracy of the personal data
- the processing is unlawful and you oppose the erasure of the personal data and requests the restriction of their use instead
- Saffron Housing no longer needs the personal data for the purposes of the processing, but we are required by you for the establishment, exercise or defence of legal claims

We will tell you before any restriction is lifted.

## Right to object

You have the right to object, on grounds relating your particular situation, at any time to processing of your data.

Saffron Housing will no longer process your data unless we can demonstrate compelling legitimate grounds for processing your data which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

## Right to object to automated decision making

Saffron housing does not automate any decision making currently.

## 13. Our commitment to you

Saffron Housing Trust is committed to be accountable for your personal information. As part of that commitment, we will not;

- send you unsolicited marketing material
- sell your personal information
- pass on your personal information to unrelated third parties unless we are allowed or required to do so by law
- transfer or store your personal information outside of Europe (the European Economic Area) outside of the control of the UK / European regulations

## 14. Who can you contact for more advice?

We don't want to be intrusive and don't want to ask you irrelevant or unnecessary questions. The information you give us will be kept secure to minimise the risk of it being accessed by someone who shouldn't have it. We have a Data Protection Officer who makes sure that we respect your rights and follow the law.

If you have any questions, please contact our **Data Protection Officer:**  
**DPO@saffronhousing.co.uk**

For independent advice about Data Protection, privacy and other data sharing issues you can contact the **Information Commissioner's Office** (ICO).

You can also contact the ICO directly if you think we have processed your data in a way which you think is unfair or unlawful. Or you can contact them if you are unhappy with how we protect your privacy rights in general:

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

[casework@ico.org.uk](mailto:casework@ico.org.uk)

0303 123 1113 (local rate) or 01625 545745

Information Commissioner's Office,

Wycliffe House, Water Lane,

Wilmslow, Cheshire, SK9 5AF

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