

Warwickshire Rural Housing Association Privacy Notice

Who we are?

Warwickshire Rural Housing Association (WRHA) is a registered housing provider regulated by the Regulator of Social Housing.

WRHA's services are delivered by Midlands Rural Housing. Midlands Rural Housing is a subsidiary of emh Housing and Regeneration Limited (trading as emh), which provides specialist management services to independent rural housing associations.

emh is a registered housing provider regulated by the Regulator of Social Housing and is a functional division of emh group ltd, which is the non-asset-owning parent company.

Our Privacy Promise

We promise:

- To keep your data safe and secure
- To treat any data concerns you may have as a priority

What is the purpose of this notice?

This privacy notice aims to give you information on how we collect and process your personal information.

It makes you aware of how and why your personal information will be used, namely for the purposes of managing your tenancy agreement, and how long we will usually retain it for.

It provides you with certain information that must be provided under the UK GDPR, the Data Protection Act 2018, the Data Use and Access Act 2025 and any subsequent legislation or regulatory requirements in force from time to time, or any successor legislation.

This notice primarily covers how we use information relating to residents but also covers non-residents using our services. In these cases, we will be the "data controller" for the purposes of UK data protection law.

This privacy notice may be supplemented by additional privacy notices. We strongly advise you to read this notice alongside any supplemental privacy notice produced, including:

- **For customers and tenants:** WRHA Privacy Notice – Customer and Resident
- **For job applicants and employees:** Privacy Notice for Workforce and Job Applicants

How we use your personal data

We only collect and use personal information where we have a valid legal basis for doing so. The sections below explain what data we process, why we process it, and the legal basis that applies.

Contract

We process the following information when it is necessary to enter into or perform a contract with you:

Contact and tenancy information

This includes: name, date of birth, previous address, telephone numbers, email address, and supporting documents (which may include photographs of you or any joint applicants).

Why:

- To set up and maintain your tenancy account with us
- To administer housing, property care and support services
- To communicate with you about your tenancy or support package
- To help prevent tenancy fraud

Equality monitoring data (ethnicity, religion, sexuality)

Why:

- For analysis purposes, as required by our regulator
- To provide information on extra services we offer

Details of who is living with you

Why:

- To ensure the property is not overcrowded or under-occupied

Children's personal data

We do not usually process data on children aged under 18 living in our properties, as all tenants are adults. However, we record children's basic information (name and date of birth) where they are resident in one of our properties, to check for overcrowding and assess other tenancy management issues. We may also receive children's information where we are involved in housing and tenancy aspects of a welfare case as part of a multi-agency working solution.

Legal obligation

We process the following information when required to comply with the law:

Proof of right to rent

Why:

- To assess your entitlement to rent in compliance with immigration legislation

National Insurance number and financial information

Why:

- To assess your benefit entitlement and council tax
- To help prevent tenancy fraud

Legitimate interests

We process the following information because it is necessary for our legitimate business purposes, and these interests are not overridden by your rights:

Details of any support needs, disability information, next of kin details / emergency contacts

Why:

- As required by our regulator and to provide information on extra services we provide, such as tenancy support

Authority to Act or Power of Attorney

Why:

- To ensure we deal with the most appropriate person managing your affairs

References from previous landlords

Why:

- To provide you with appropriate support and assess tenancy suitability

Closed Circuit Television (CCTV)

Some of our locations and offices have CCTV and you may be recorded when you visit them. CCTV is used to provide security and protect both our visitors and communities. Footage is only viewed when necessary (e.g. to detect or prevent crime) and is stored for a set period of time before being deleted. emh complies with the Information Commissioner's Office CCTV Code of Practice and we display notices so you know when CCTV is in use.

Housing Needs Survey information

This includes: name, date of birth, contact details, financial information, and details of who is living with you.

Why:

- Local surveys provide valuable information on the level of housing need and can help demonstrate the need for affordable housing and the level of community support for new development

Particularly sensitive information we may collect about you

How we use your special category personal data

“Special categories” of personal data require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information in the following circumstances:

- In limited circumstances, with your explicit written consent
- Where we need to carry out our legal obligations in the field of employment, social security or social protection law
- Where there is a substantial public interest with a basis defined by the Data Protection Act 2018

Less commonly, we may process this type of information where it is needed in relation to legal claims, or where you have already made the information public.

The sections below explain what we process, why we process it, and the legal basis that applies.

Social protection law obligation

We process the following information where required to meet our responsibilities as a social housing provider and to comply with regulatory and legal obligations:

Details of unspent convictions or criminal offences

This may include information about custodial sentences, being on a register, or being identified as a person of interest.

Why we use it:

- To ensure that we house you appropriately
- To ensure there are no unacceptable risks to customers, neighbours, staff or contractors
- To ensure that specialised support can be offered where required

Disability information

Why we use it:

- To meet our obligations under the Equality Act 2010
- To comply with regulatory reporting requirements
- To identify and offer additional services, such as tenancy support

Ethnicity, Religion and Sexuality

Why we use it:

- For monitoring and analysis required by our regulator
- To comply with the Equality Act 2010
- To help us understand and improve the services we provide, including offering additional support where appropriate

How do we use your personal information?

We need all the categories of information listed above primarily to allow us to perform our contract with you and to enable us to comply with our legal obligations. In some cases, we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

We do not use automated decision making or profiling, however there may be occasions where inadvertently we identify special category information about you. For example, your ethnicity, religion, sexual orientation or disability may be evident from:

- Photographs
- Video footage
- Face-to-face meetings
- Statements you provide to us
- Declaration of Interests
- Social media

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Generally, we do not rely on consent as a legal basis for processing your personal information other than in relation to sending direct marketing communications to you via email or text message. You have the right to withdraw consent to such marketing at any time by contacting us at

dataprotection@emh.co.uk

How is your information collected?

Personal data is any information about an individual from which that person can be identified. The personal information we may collect about you broadly falls into the following categories:

Information that you provide voluntarily

We may process and store information that you have provided voluntarily – for example, when you register with us or express interest in any of our services. It will be clear to you at this point what personal data you are providing.

Information we receive from third party sources

Information about you may be passed on to us via local authorities as we provide social housing. From time to time we may also obtain personal information about you from other third party sources (for example referees or government agencies like the Disclosure and Barring Service), but only where we have checked that these third parties are either legally permitted or required to disclose your information to us.

Information collected automatically

We may collect information about how you interact with our services through the use of automated tools and systems.

When do we share your information?

Personal information we have about you is used to make sure the services we offer continue to be the most appropriate for you.

We will use your information to manage our relationship with you, for example keeping our records up to date and to enable us to assist in the coordination of support services. We will also use your information to carry out the contractual obligations we have, for example arranging repairs, planned maintenance, surveys and inspections.

We will not normally share your information with anyone else. However, there are certain circumstances where we will be required to share your information with other organisations. We will comply with UK data protection law when disclosing this information.

Where it is required or necessary in accordance with UK data protection law, we may disclose your personal information to the following categories of recipients:

Recipient / Category of organisation	Purpose of sharing
IT providers	To provide data processing services to us, or who otherwise process personal information for purposes described in this Privacy Notice.
Third party service providers (e.g. repairs contractors, surveyors, maintenance providers)	To carry out contractual obligations such as arranging repairs, planned maintenance, surveys and inspections on our behalf.
Our Regulators, such as the Regulator of Social Housing and the Housing Ombudsman	We are under a legal obligation to provide information to the appropriate regulators and the Housing Ombudsman (e.g. referral measures).
Government bodies and law enforcement agencies, such as the Housing Benefits department, social services, probation services, police forces and courts	We share information with services dependent on the circumstance, including finding further financial support, handling safeguarding concerns, or responding to legislative or court orders. Most sharing is completed on a case-by-case basis.
Collection agencies and legal representatives	For the purpose of collecting rents or other money owed to us.
Financial organisations and Housing Benefits department	To assess your benefit entitlement and council tax, and to help prevent tenancy fraud.
Other housing associations, trusts or local authorities	To facilitate housing management, referrals and multi-agency working arrangements.
Health authorities and health and social welfare organisations	To support safeguarding, welfare and care coordination where applicable.
Survey and research organisations	To conduct research and gather insight to improve our services.
Other companies within the emh Group	To provide you with accurate support throughout the usage of our services (including safeguarding, health and safety etc.).
With our insurers and legal advisors	(Ad-hoc) To provide contextual information when filing an insurance claim or when legal advice is

Recipient / Category of organisation	Purpose of sharing
	required regarding an escalating situation (e.g. court cases, SARs).
With third parties to whom we may choose to transfer or merge parts of our business or assets	If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

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

This list is not exhaustive as there are other circumstances where we may also be required to share information, for example:

- To meet our legal obligations
- In connection with legal proceedings (or where we are instructed to do so by Court order)

If information is requested from a third party not covered by the above, we will seek written consent from you where it is required under UK data protection law.

How do we keep your information secure?

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

Our arrangements with third party service providers are governed by contractual provisions and they only have access to personal information to perform the described purposes and may not use it for other purposes.

International data transfers

All personal information you provide to us is stored on our secure servers within the UK. However, there may be occasions where your information may need to be stored in or sent to companies, service providers, agents, subcontractors and regulatory authorities in countries outside of the UK, which may not have the same level of security and protection as we have under UK legislation. If we have to do this, we will make sure that suitable security measures are in place subject to the requirements of the UK GDPR.

We have put in place procedures to deal with any suspected data security breach and will notify you and the Information Commissioner's Office of a suspected breach where we are legally required to do so.

From time to time we would like to send you information about services of ours, other members of the group, and our partner agencies where we feel this may be of interest to you. Where you consent to receive marketing information, you have the right at any time to stop us using your information for marketing by withdrawing your consent. Consent can be withdrawn by contacting us at

dataprotection@emh.co.uk

How long do we keep your information for?

We will only retain personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements.

We only hold information about you for as long as it is needed for the purpose(s) for which it was collected, or as required by law.

Some examples of our data retention periods include:

Personal data	Retention period
Photographs	End of Tenancy plus 6 Years
Bank Details	End of tenancy
Survey Results	2 Years after the date of survey
CCTV footage	30 days, deleted within one week thereafter

Access to and correction of the information we hold about you

You can find out if we hold any personal information about you by making a 'subject access request' under the UK GDPR.

If we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding it
- Tell you who it has been disclosed to; and
- If we are able to, let you have a copy of the information in an intelligible form

You may also have the right for your personal information to be transmitted electronically to other organisations in certain circumstances.

You can access your personal information we hold by writing to us at this address:

emh, Governance, Risk & Assurance Team, Memorial House, Stenson Road, Coalville, Leicestershire, LE67 4JP

Or by emailing us at: dataprotection@emh.co.uk

You have the right to question any information we have about you that you think is wrong or incomplete. Please contact us if you want to do this and we will take reasonable steps to check its accuracy and correct it.

If any of your personal information changes, such as a contact number or email address, please let us know right away so we can update our records.

Your rights

Under data protection law, you have rights including:

Your right of access

- You have the right to ask us for copies of your personal information.

Your right to rectification

- You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure

- You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing

- You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing

- You have the right to object to the processing of your personal information in certain circumstances.

Your right to data portability

- You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

Your right to withdraw consent

- If the lawful basis for processing is consent, you have the right to withdraw that consent at any time. Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent, and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain services to you.

Your 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 the processing of your personal data for marketing, which includes profiling to the extent that it is related to such direct marketing.

Profiling and automated decision making

- You also have the right to object to and not to be subject to a decision based solely on automated processing including profiling. We do not carry out automated processing or profiling.

To exercise any of these rights, please contact us using the details in the “How to contact us” section below.

If you require any further information about your right to rectification, erasure, restriction of or object to processing, or you wish to withdraw your consent, please contact us (see How to contact us below).

Complaints – Your right to complain

We take any complaints we receive about the collection and use of personal information very seriously. We encourage you to bring it to our attention in the first instance if you think that our collection or use of information is unfair, misleading or inappropriate. You can make a complaint at any time by contacting us (see How to contact us below).

Under the Data Use and Access Act 2025, there has been the introduction of the **right to complain**, which means that you should come to us prior to going to the ICO if you have any complaints or concerns. We will do our best to resolve this for you.

However, if you think our collection or use of personal information is unfair, misleading or inappropriate, or if you have concerns about the security of your personal information, you also have the right to make a complaint to the Information Commissioner's Office.

You can contact the Information Commissioner's Office at the following address:

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

How to contact us

Please contact us if you have any questions about our privacy policy or the information we hold about you. You can do so via one of the contact details below:

- Email – dataprotection@emh.co.uk
- Post – Governance, Risk & Assurance Team, Memorial House, Stenson Road, Coalville, Leicestershire, LE67 4JP
- Telephone – 0300 123 6000

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
- Asking you to provide feedback on our products, services and events

We have appointed a Data Protection Officer to oversee our compliance in line with Data Protection legislation. If you have any questions about this privacy notice or how we handle your personal information, please contact our Data Protection Officer using the details above.

Privacy Notice updates

Our Privacy Notice will be regularly reviewed, and it may change at any time in the future. We encourage you to check this Privacy Notice periodically to stay informed about how we are protecting the personal information we hold.