

Privacy Notice

A guide to how Phoenix looks after
and uses your personal information



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The Phoenix Privacy Promise

We promise:

- ▶ To keep your personal information safe and secure
- ▶ Never to sell your personal information
- ▶ To tell you how we use your personal information.

If you have any questions, about this guide you can ask us by emailing info@phoenixch.org.uk or call us on 0800 0285 700. A full copy of our Data Protection and Privacy Policy is available on our website www.phoenixch.org.uk

Introduction to this guide

Phoenix Community Housing is a not-for-profit, resident-owned and led housing association.

This guide is to let you know how we collect, look after and use your personal information.

This includes what you tell us about yourself and what we collect about you so that we can provide you with the best possible services. It explains how we will use your information, when we share it, and how we store it.

What the law says

Your information is protected by law. Data protection law states that we can collect and use your personal information if we have a proper reason to do so. A proper reason means:

- to fulfil our obligations as set out in your tenancy agreement or lease
- when it is our legal duty
- when there is a legitimate interest (for example when, you as a resident, or Phoenix may benefit). This can include keeping our records up to date and using CCTV at our offices, to ensure that we have adequate security in place.
- when you give us your consent for us to do so.



What information do we hold about you?

As your landlord, freeholder or service provider, we may hold some or all of the following information about you:

- your name and date of birth
- your home address, your email and telephone numbers
- details about the people you live with
- rent and service charge information, including details of any arrears
- details about your income and employment status
- medical and other details about your health
- financial information, including any credit checks, income details, bank details and housing benefit information
- your image.

We may also hold sensitive personal information about you and other members of your household, but will only collect it with your consent. Sensitive personal data may include information about you:

- health
- sexual orientation
- religious beliefs
- race or ethnicity.



We use this information to help provide services to meet your needs. We also anonymise your information and use it to check if our services are accessible to different groups.

You can refuse to give us sensitive personal information, and we will respect your wishes.

How do we collect your information?

We collect personal information on forms and applications that you fill in and from other organisations who help us to deliver our services.

Information you give to us:

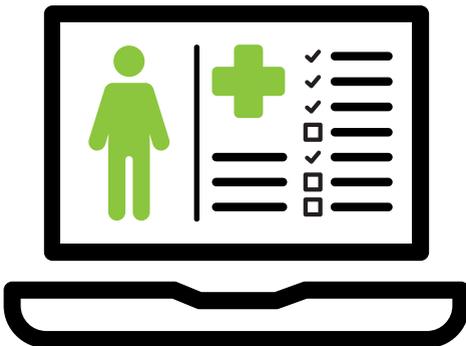
- when you apply to us for housing
- when you sign a tenancy agreement or lease with us
- when you talk to us on the phone, in person, in emails and via social media or letters

- in customer surveys
- when you use or request to use particular services (like our Job Club)
- when you consent to receive marketing updates from us (like information about events at The Fellowship Inn)
- when you become a Phoenix Shareholder or join our Gold Membership scheme.

Information we receive from other organisations:

- local authorities
- the Police
- health care providers
- mortgage brokers
- fraud prevention agencies
- credit reference agencies
- insurers
- government and law enforcement agencies.

When we collect personal information, we will always aim to tell you what we are collecting and how we will use it.



How we use your information

We use the information we collect for a number of purposes, but primarily to provide housing accommodation and services to you. This includes:

- letting, renting and leasing properties
- providing key services including repairs and associated welfare services, advice and support
- administering any waiting lists
- carrying out research
- to make financial arrangements related to your home
- administering housing and property grants
- maintaining our accounts and records
- supporting and managing our employees, agents and contractors
- to meet our legal and regulatory requirements

We also process personal information using CCTV systems to monitor and collect visual images for the protection and detection of crime. Where CCTV is used, there will be notices to let you know.

We may also use your data for profiling, so that we can better understand your circumstances and use this information to predict when you may fall into debt.

We do not use your data to make automated decisions.

How we share your information

In order to deliver our services, we may share your personal information with our wholly owned subsidiary Phoenix Agency Services (trading as the Phoenix Repairs Service), other contractors who are providing services on our behalf (such as when you are contacted to give feedback about the services you receive from Phoenix), and some other organisations, where we have a legal responsibility to do so.

This includes:

- contractors, agents and advisors who we use to deliver our services to you and or collect what you owe us.
- HM Revenue and Customs
- credit reference agencies
- fraud prevention and investigation agencies
- in connection with legal proceedings
- companies we have a joint venture or agreement to cooperate with
- companies you ask us to share your data with
- auditors and external consultants.

We will only share data with other organisations when they have signed up to our data protection and privacy requirements and agreed to meet all data protection laws. We check to make sure these organisations are meeting

their requirements under data protection law and guidance.

We will not transfer your data outside of the UK. Some of the online services we use, for example websites that allow you to complete surveys or give feedback, may store some of this data in data centres outside of the UK. When this happens, we will always ensure that these companies meet data protection regulations and that your data is treated in accordance with our data protection policy.

How long do we keep your data for?

We will store your personal information securely for as long as you are a tenant, leaseholder or freeholder of Phoenix Community Housing. Your personal data will be stored securely on our databases and servers, at our offices and offsite secure facilities.

After you stop being a resident or customer, we will keep some of your information for a period of time.

We do this to:

- respond to any questions or complaints
- show that we treated you fairly
- pursue any outstanding monies owed to us
- for financial or audit purposes
- for legal purposes.

We have data retention guidance which sets out how long we will keep personal data and in what circumstances. This is available on our website www.phoenixch.org.uk by emailing info@phoenixch.org.uk or by calling us on 0800 0285 700.

Your rights

You have the right to see the personal data that we hold about you and the right to have a copy provided to you (or someone else on your behalf). This is called a subject access request.

If you think the personal data that we hold about you is wrong, you can ask to have it corrected and we will take all reasonable steps to check its accuracy and correct it.

In certain circumstances, you also have the right to:

- request that we do not process your data
- request a copy of all the personal data held by Phoenix to be supplied to you in an electronic format and for this data to be transferred to another organisation of your choosing.

You also have a right to request that we delete some of the information that we hold about you. This will only apply:

- where you can prove the personal data is no longer necessary
- if we held your data unlawfully
- if you successfully object to our processing
- if we have a legal obligation to delete it.

If you give your consent to receive marketing updates from us, about a particular project or opportunity, you have the right to withdraw this consent at any point.

Who to contact about your personal data

If you would like to make a subject access request and get a copy of the data that we hold about you, or to exercise any of the rights outlined above, please contact our Data Protection Officer through our Performance and Quality Team:



FREEPOST: RTGT-SBZU-TTJA

P&Q, The Green Man,
355 Bromley Road, London,
SE6 2RP



0800 0285 700



dataprotection@phoenixch.org.uk

Changes to our privacy policy

We may be required to amend our privacy policy in the future, to meet any new legislation or good practice. Details of any amendments or changes will be published on our website and in our newsletters.

Making a complaint

Please let us know if you are unhappy with how we have used your personal data. You can make a complaint to us in writing, by email, in person or over the phone.

You also have the right to complain to the Information Commissioner's Office. Visit their website www.ico.gov.uk to find out how to report a concern or write to them at:

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

Our role as a data controller

We are registered as a data controller - this means that we collect and process your personal information, and that we have a legal responsibility to treat your personal data in accordance with the law.

We are registered as a data controller in the United Kingdom and our registration number is Z1309257. Our Subsidiary Phoenix Agency Services LTD (trading as the Phoenix Repairs Service) is also registered, registration number ZA249958.



Phoenix Community Housing, The Green Man,
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 0800 0285 700

 info@phoenixch.org.uk

 [@phoenixtogether](https://twitter.com/phoenixtogether)

 www.phoenixch.org.uk