

Sage Housing – Privacy Notice

The privacy of your information is important to us at Sage Housing Ltd (“Sage”) and we are committed to handling your information securely, respectfully and in line with data protection laws. Our privacy notice tells you what to expect when Sage processes your personal information (‘personal data’) which we collect when you become one of our customers or each time you contact us.

‘Personal data’ is any information which relates to an individual who can be identified from that information. ‘Processing’ includes the collection, recording, storage, use, disclosure or destruction of personal data. We are a “data controller”. A data controller determines the purposes and means of processing personal data.

Who we are and our contact details

We are Sage Housing of 5th Floor, Orion House, 5 Upper St Martins Lane, London, WC2H 9EA. You can find out more about us at <http://www.sagehousing.co.uk>.

For further information, please contact our Data Protection Officer by emailing dataprotection@sagehousing.co.uk.

The information we collect

We will make every effort only to collect the personal information we need from and about you. The type of information we collect will vary depending on the service we offer to you.

The information will be collected directly from you, but we may also obtain information from another person or organisation if you have given permission for them to share it with us. This could include a local authority, your previous landlord, your doctor or other health professional. In addition, we may also obtain your information from available public sources.

Types of information we collect

Personal data such as your name, address, date of birth, email address, phone number, gender, marital status, disability, race, religion, employment status, National Insurance Number and next of kin details for you and your family. We also hold data about your credit risk, rent account, rent payments, benefit status, bank account details, credit reports and contact with us about rent arrears and agreements you have made to repay arrears.

Special category personal data. This is sensitive personal information, for example, your racial, or ethnic origin, religious beliefs, other beliefs, sexual orientation, health information, political opinions and so on. Sage would only collect your sensitive personal information where there is a clear need for us to do so, such as to assess what services are relevant to you or to offer appropriate support to you. Before collecting any sensitive personal information about you we will always try to make it clear to you what information we are collecting and the reason for collecting it, and explain your choices in respect of providing this information. If you have any questions please ask us.

Criminal offence data. This is data relates to criminal convictions and offences or related security measures. Sage collects this data to ensure appropriate services can be provided. Before collecting any criminal offence data about you we will always try to make it clear to you what information we are collecting and the reason for collecting it. If you have any questions please ask us.

Why do we process your data?

Under data protection legislation we can only use your data for certain reasons and where we have a legal basis to do so. The bases on which we typically process your data are:

- To meet obligations under a **contract – your tenancy agreement** - or because you have asked us to do something with a view to entering into a contract with you;
- In order to further Sage's (or a third party's) **legitimate interests**. Our legitimate interests include: ensuring that we deliver our service to you and your household members; to properly manage our business; promoting our services. We will look to balance your interests with our legitimate interests where we rely on this condition.
- Because we have a **legal obligation** to do so; and/or
- To protect the **vital interests** of you, your family or others.

In most cases we have a legal basis for processing the data because you have a tenancy agreement or lease with us (or are applying for one).

We may need to process your data in order to assess your suitability for a home or provide you with services you need such as repairs and maintenance, tenancy advice, mutual exchanges, allocation of homes, complaints etc.

We may also be required to process your data in order to comply with a legal obligation under UK or EU law such as checking your right to rent a home in the UK.

We collect data from applicants in order to be able to assess their suitability for a home. If you are unsuccessful in your application we won't use your data for any other purpose.

What sorts of personal information do we hold?

We use the information we collect from or about you (as applicable) in various areas of work, including:

Assessing and processing housing applications, sales of shared ownership properties, service eligibility and complete tenancy sign-ups

- To process your application, we require your name and contact details (including telephone numbers, email addresses and details of anyone you may choose to represent you) for use across the organisation and by our contractors, suppliers and partners.
- We will collect detailed personal information about you and other household members, including age, sex, date of birth, ethnicity, income, National Insurance number, income and benefits details, employment status, gender identity, relationship status, any disabilities, any communication and accessibility requirements, religion, sexuality, nationality, caring responsibilities, access to

financial services such as banks and credit unions, bank details, benefits, council tax, medical information, details of any unspent criminal convictions.

This information is required as we will be unable to accept an application for services without it. Information on household members is required as it is also in our legitimate interests to know who will be living in our premises and to ensure the property offered is adequate for the needs of the household. We assume any information you provide about household members is provided with their full knowledge and you should direct your household members to this policy.

Managing your tenancy or lease

- Your contact details (telephone number and email address) so we can reach you when we need to discuss issues pertaining to your tenancy or lease, e.g. access for maintenance and improvements, if we need to arrange a home visit or to contact you in the event of an emergency or to enforce the terms of your tenancy/lease. We may need to provide your contact details and relevant associated information to our contractors who may be undertaking work on your property on our behalf.
- We will ask you for supporting documents to effect changes to your tenancy, such as a copy of your marriage certificate or deed poll certificate to change your name on our records, or supporting medical evidence to reassess any change to housing requirements as a result of a medical need.
- We will hold records of all our contact with you, your contact with us, and any contact from third parties representing you or about you.
- Financial records about the amount of money you have paid us, any amount(s) outstanding and associated recovery action.
- We may hold information about your history, for example regarding credit status or criminal convictions, if we decide this is required.
- We also record information about repairs, maintenance, and servicing requirements of your home. We may need to provide this information in particular to our contractors
- We will also use your contact information to tell you about changes to Sage, for example changes to our organisational structure and governance arrangements, and to resolve or investigate complaints.

The provision of this information is a 'contractual requirement'. Without this information, we may be unable to manage or provide your services. For example, we would not be able to discuss changes to your service if we do not hold your contact details. Please speak to us if you have any concerns.

Confirming your eligibility for housing and prevent fraud and illegal sub-letting

- We will ask for proof of ID e.g. for tenancy audits or when the housing composition changes or a reasonable period of time has passed (this applies to all household members over the age of 18).

We need to be able to verify your identity to provide services to you. Processing for the purpose of fraud prevention is required in order to meet our legal obligations.

Meeting your needs in our service delivery

- We record your support needs in our dealings with you and to improve our communications with you.

Where processing information about you or your household members, we may have a legal or contractual obligation to process this information for example to provide inclusive services.

It is also in our legitimate interests to ensure that service delivery meets the needs of our service user and their household.

Managing the legal process if you apply to buy your home or want to access another home ownership route

This information is required to manage the legal process needed in preparation for entering into contractual relations.

Assisting with personal security and prevention and detection of crime

- We may capture your image on our CCTV systems if you visit an estate or office which is covered by this facility.

This information may be required to meet legal obligations and our legitimate business interests around health and safety and crime prevention.

Understanding how we're performing

- Our managing agents may undertake call recordings for training and quality monitoring purposes.
- We will carry out customer satisfaction surveys to help us monitor our performance and improve our services.

It is in our legitimate interests to understand how we are performing so we can meet our objectives.

Keeping in touch with you

We may wish to communicate with you and keep you up to date with events and news about the organisation which we think will be of interest or use to you.

Prevention and detection of crime, and regulatory purposes

We do this to meet our legal obligations and to further our legitimate interests.

How do we collect data about you?

The information we hold about you comes from you or your household members, for example when you filled in your original application and signed up to your tenancy. We will

also have any letters or emails you have sent to us, records of calls to the office and any feedback or permission forms you have completed.

Who might we share your information with and why?

Sage operates through contracting with managing agents that are responsible for managing relationships with tenants on a day-to-day basis. This means that we will share information with the particular agent that is responsible for managing the home in which a tenant lives.

We will not disclose personal information about you to other parties except where we have a legitimate interest or other legal basis for doing so or where you have given us your consent to disclose (if required).

Your data may be shared within Sage where it is necessary for staff to carry out their duties or to provide services to you. We may share your data with our contractors and suppliers so that we can carry out repairs and maintenance to your home or provide other services.

There may be situations in which we have or choose to share some of your information with other third parties including (but not limited to):

- The Police
- Legal advisers
- Social Services
- Benefits agencies
- Utility providers
- Emergency services
- Credit reference agencies
- Department for Work and Pensions
- Other Housing Associations or providers.
- Medical professionals
- Market research companies

Where we share data with a third party organisation or statutory agency we will ensure that the organisation or agency understands how the data is to be used, what information is to be shared and when it will be destroyed. We may provide more detailed information to you about any data sharing that takes place, or you can ask us for more information about it.

In some cases we may be legally required to provide information to one of these other organisations – for instance, in certain circumstances we may be required to provide information about housing benefits to a local authority or central government department.

Our staff are trained in data protection and know the importance of keeping your data safe and secure.

We don't normally send data overseas

Our business is based solely in the United Kingdom, and so we do not ordinarily send data overseas. We may sometimes make use of cloud-based systems located outside of the EU to support the management of our business. Where this happens, we will ensure that there are appropriate safeguards in place to protect your data.

Anti-Money Laundering

Sage is required by law to comply with UK Anti Money Laundering Regulations (AML Regulations).

Whether you are a new or existing customer, we may therefore need to verify your identity and your source of funds.

We may do this by:

- Requesting that you provide original or certified copies of identity evidence.
- Requesting that you provide necessary documentation to support proposed source of funds.
- Undertaking an electronic identity check using a credit reference agency to search information relating to you.

We use TransUnion credit reference agency to undertake identity checks. You can find out how TransUnion uses and shares personal information, the type of information they hold, where it comes from and the legalities of how it is handled by using the following link:

<https://www.callcredit.co.uk/legal-information/bureau-privacy-notice>

Marketing

With your consent (or because you have used or been interested in similar services from us previously), we may use your personal data in order to send you information about our services, promotions and events that we believe may interest you. We don't buy in lists of customers or contacts where information is about an individual.

If you are or represent a business, you may also receive an email from Sage because we obtained your contact information from a reputable third party agency.

We collect your basic identification and contact details. This may include for example your name, company, telephone number, and email address.

If you decide to opt-out of our marketing, we will no longer use your personal data for this purpose. You may opt out (or opt back in) at a later date. You have a right at any time to stop us from contacting you for marketing purposes.

You can easily change or withdraw consent our marketing messages by clicking the 'unsubscribe' link at the bottom of each marketing email.

You may also choose to stop receiving direct marketing communications from Sage at any time by sending notice of your decision to Sage using the following contact details unsubscribe@sagehousing.co.uk.

How long we keep your data for

We only keep your data for as long as we need it for the purposes we collected it for. For

tenants and leaseholders this is up to 6 years after the end of your tenancy or lease, in case of any contractual claims or references.

For unsuccessful applicants we keep your data no longer than 6 months after a decision has been made on your application in case there are any questions or complaints that arise from our decision.

Please contact us if you would like any more information.

Protecting your data

We take the protection of your data very seriously. We have procedures in place to protect your data from loss, misuse, disclosure, abuse or destruction.

Where we share your data with third parties, such as contractors, we provide written instructions to them to ensure that your data is held securely and in line with data protection legislation. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

We do not normally undertake “automated decision making”

We do not normally undertake ‘automated decision making’ – that is decisions made about individuals without any human involvement.

Your rights

The law on data protection gives you certain rights in relation to the personal data we hold about you. These are:

- **The right to be informed.** This means that we must tell you how we collect and use your data (i.e. the details provided in this privacy notice).
- **The right of access.** You can ask to see the data we hold about you which we will provide free of charge (in most circumstances). A request to see this information is known as a ‘subject access request’ (“SAR”).

SARs need to be made in writing and we ask that your written request be accompanied by proof of your address and identity. If you require specific information, it is helpful if this is clear in your request, for example, information from a particular time period or about a specific correspondence. If someone is requesting information on your behalf, they will need written confirmation from you to show you consent for us to release this and proof of ID (both yours and theirs).

We will provide a copy of the information requested **free of charge**. However, we can charge a ‘reasonable fee’ when a request is manifestly unfounded or excessive, particularly if it is repetitive. We may also charge a reasonable fee to comply with requests for further copies of the same information.

We will seek to provide you with the information you have asked for within one month to provide you with the information requested, although in certain circumstances it may take longer to provide you with some or all of the information you have asked for and we will try to keep you updated about this as promptly as we can.

- **The right to rectification.** You can ask for any inaccuracies to be corrected. If any of the data we hold about you is wrong you are able to ask us to correct it.
- **The right to ask for erasure:** to ask to have your information deleted. If you want us remove any of your data you can ask us to delete it from our systems where it is no longer necessary for us to keep it. Please be aware, however, that we may not need or be able to comply with such requests, depending on the circumstances.
- **The right to restrict processing** of your data. You can ask us to stop using your data while we check that it is correct.
- **The right to object** to the inclusion of any information if we are processing it based on a legitimate interest. You can tell us that you think the way that we use your data is wrong.

Making a complaint

If you are concerned about the data we hold, how we are processing it or if you would like to see the data we hold about you please contact us at dataprotection@sagehousing.co.uk.

If you remain dissatisfied, you have the right to refer the matter to the Information Commissioner. The Information Commissioner can be contacted at:

Helpline: 0303 123 1113
<https://ico.org.uk/concerns/>