

**Lambeth & Southwark Privacy Policy**

**Privacy policy**

This privacy notice explains how Lambeth and Southwark Housing Association (LSHA) will use any personal data you provide to us.

Please read this notice carefully and make sure that you understand our rights and responsibilities. In this notice, when we refer to the ‘site’ we mean our website (http://www.lsha.org.uk/)

Lambeth and Southwark Housing Association (LSHA) is a not-for-profit housing association and exempt charity. We are regulated by the Regulator of Social Housing (registered number L0927) and the Financial Conduct Authority (registered number 14888R). LSHA is a Registered Society registered under the Co-Operative and Community Benefit Societies Act 2014 with number 14888R.

**Summary**

The full details are set out in the relevant sections of this notice below, but in summary:

We receive personal data relating to you from you directly, but it may occasionally be provided to us by third parties with whom you have a separate relationship (such as a local authority).

We use your data to provide housing and other services to you, correspond with you, meet our legal obligations and improve this site and our products and services.

We only provide your personal data to third parties for our limited business purposes or as permitted by law. We don’t share your data with third party advertisers.

We store data for specified periods for our limited business purposes.

You have certain rights, prescribed by law, in relation to the processing of your data, such as rights to request access, rectification or deletion of your personal data.

You can contact us to enquire about any of the contents of this privacy notice by emailing the Data Protection Officer at info@lsha.org.uk or by writing to the Data Protection Officer at our office address.

**1. Introduction**

1.1    In this notice we explain how we will handle your personal data.

**2. How we use your personal data**

2.1    In this section we have set out:

        (a)    the general categories of personal data that we may process

        (b)    the source and specific categories of that data, for personal data that we did not get directly from you

        (c)    the purposes for which we may process your personal data

        (d)    the legal bases of the processing. When we refer to a ‘legal basis’, we mean the provision of the General Data Protection Regulation under which we conduct the relevant processing.

**On this site**

2.2    We may process data about your use of the site, your tenancy, your applications to rent property through us and your use of our other products and services.

       (a)   In relation to the use of the site, we may process your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your use. This data is obtained through our analytics tracking system.

The legal basis for this processing is our legitimate interests, namely monitoring, analysing and improving our site, products and services.

       (b)   In relation to applications and enquiries submitted through the site relating to the purchase, leasing or renting of homes or other property, we may process the information you enter voluntarily. This includes your names and identifying information, address and contact details, demographic details (optionally including sensitive personal data such as your faith, ethnic background and/or sexuality) and details of your domestic circumstances and finances.

The legal basis for this processing is to take steps, at your request, to enter into a contract for the provision of the property or a service.

We may also send you marketing information relating to properties of a type and/or in a location in which you have expressed an interest. The legal basis for this processing is our legitimate interests in marketing our housing and other service offerings, where permitted, or your explicit consent to receive these communications.

**In the course of providing housing services**

2.3    We may process your personal data that you have provided for the use of our services (‘service data’), whether by you or by any third party with whom you and we have a separate contractual relationship. The legal basis for this processing is either:

* The performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract
* Where we have no contract with you, you have consented to such processing in relation to any contract you may have in place with the relevant third party.

2.4    We may process information contained in any enquiry you submit to us regarding products and/or services (‘enquiry data’). This may be processed for the purposes of offering, relevant products and/or services to you. The legal basis for this processing is your consent.

2.5    We may process information relating to transactions, including payments of rents and service charges or for the provision of services, entered into with us through our site or otherwise (‘transaction data’). This may include your contact details, your card details and the transaction details (although typically we will not have any access to your card details, and these will only be available to our payment processing service provider). The transaction data may be processed for the purpose of meeting your obligation to pay rent and/or service charges on your lease or tenancy, or supplying the purchased goods and services, and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

**Correspondence**

2.6    We may process information contained in or relating to any communication that you send to us (‘correspondence data’). This may include the communication content and metadata associated with the communication. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of the site, our business and our communications with users.

2.7    We may process any of your personal data identified in the other provisions of this privacy statement where necessary in connection with legal claims. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

2.8    In addition to the specific purposes for which we may process your personal data set out in section 2, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

**In connection with queries, complaints, reports of antisocial behaviour and other communications**

2.9     We may process information disclosed to us by any party (including yourself) in connection with allegations of anti-social behaviour where you are identified as an alleged victim, witness or perpetrator or are the reporting party. This may include your name, address and contact details, witness and other statements describing the alleged incident or behaviour and the circumstances, interviews and assessments by investigating officers, correspondence with relevant agencies, including (but not limited to) the police and local authorities. The legal bases for this processing are for performance of our contractual obligation to make sure that tenants are allowed quiet enjoyment of their homes. Also for our legitimate interest in making sure that the local community neither commits nor suffers any unnecessary disturbance.

**3. Providing your personal data to others**

3.1    We may disclose your personal data to our insurers and/or professional advisers as necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes.

3.2    We may disclose personal data to our suppliers or subcontractors, or to third parties with whom you have a contractual relationship, such as local authorities or utility providers, where reasonably necessary for the performance of any contract with you. This applies whether that contract is entered into between you and us, or between you and a third party. For example, we may disclose:

        (a)    account data and/or service data to entities which process payments on our behalf, or to third parties such as local authorities, the benefits agency or utility providers

        (b)    transaction data to our payment processing service providers, to process your payments, refund such payments and deal with complaints and queries relating to such payments and refunds.

3.3    In addition to the specific disclosures of personal data set out in this section 3, we may also disclose your personal data for compliance with a legal obligation, or in order to protect your vital interests or the vital interests of another person.

**4. International transfers of your personal data**

4.1    In this section 4, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).

4.2    Our website is hosted within the EEA.

4.3    Some of the other third parties to whom we may transfer your personal data, discussed in section 3, may be located outside the EEA or may transfer your personal data to their own service providers located outside the EEA.

**5. Retaining and deleting personal data**

5.1    Section 5 sets out our data retention policies, which are designed to make sure that we comply with our legal obligations in relation to the retention and deletion of personal data.

5.2    Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

5.3    We will retain and delete your personal data as follows:

        (a)    All personal, account and tenancy data (including rent account details) will be retained for as long as we provide housing, products or services to you, or as long as you have an outstanding balance on your account with us and for six years afterwards. Within twelve months after the end of such period it will be deleted from our systems.

5.4    We may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

**6. Amendments**

We may update this notice from time to time by publishing a new version on the site. You should check occasionally to make sure you are happy with any changes to this privacy notice, although we will notify you of material changes to this notice using the contact details you have given us.

**7. Your rights**

7.1    In this section 7, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. You can read guidance from the Information Commissioner’s Office at www.ico.gov.uk for a fuller explanation of your rights.

7.2    Your principal rights under data protection law are:

        (a)    the right to access

        (b)    the right to rectification

        (c)    the right to erasure

(d)    the right to restrict processing

        (e)    the right to object to processing

        (f)    the right to data portability

        (g)    the right to complain to a supervisory authority

        (h)    the right to withdraw consent.

7.3    You have the right to confirmation as to whether or not we process your personal data and, where we do, to access the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

7.4    You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

7.5    In some circumstances you have the right to the erasure of your personal data. These might include if:

        (a)    the personal data is no longer necessary for the purposes for which it was collected or otherwise processed

        (b)    you withdraw consent to consent-based processing

        (c)    the processing is for direct marketing purposes.

However, there are certain general exclusions of the right to erasure, for example where processing is necessary for compliance with a legal obligation or in connection with legal claims.

7.6    In some circumstances you have the right to restrict the processing of your personal data. Where processing has been restricted on this basis, we may continue to store your personal data and will observe the restrictions on processing except in the case of processing permitted by applicable law (for example, in connection with legal claims or for reasons of public interest).

7.7    You have the right to object to our processing your personal data on grounds relating to your particular situation, but only that the legal basis for the processing is that it is necessary for:

        (a)    the performance of a task carried out in the public interest or in the exercise of any official authority vested in us

        (b)    the purposes of the legitimate interests pursued by us or by a third party.

If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or if the processing is for legal claims.

7.8    You have the right to object to us processing your personal data for direct marketing purposes, including profiling for direct marketing purposes. If you make such an objection, we will cease to process your personal data for this purpose.

7.9    To the extent that the legal basis for our processing of your personal data is consent, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

7.10  If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection.

7.11  To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

7.12  You may exercise any of your rights in relation to your personal data by written notice to us.

**12. Our details**

12.3  Our head office is at:

7A St. Agnes Place, London SE11 4AU

12.4  You can contact us by:

        (a)    post, using the postal address given above

        (b)    using the contact form on the website

        (c)    telephone, on the contact number published on the website from time to time

        (d)    email, using the info@lsha.org.uk email address.

**13. Third parties and security**

13.1  The site contains links to third party websites and refers to third party service providers and other entities. If you follow a link to any third party website or deal with any third party entity referred to on the site, then you should note that these third parties may have their own privacy and cookie policies, and that we are not responsible for their use of any personal data which you may provide them. You should make sure that you have read and understood any relevant policies.

13.2  Although we do our best to ensure the security of personal data provided to us, and to use only reputable service providers, any transmission of data via the Internet is by its nature insecure and we cannot guarantee the security of any personal data you provide us.

**Related links**

LSHA is legally bound to comply with UK money laundering legislation, we may therefore conduct verification checks including an electronic check to confirm a customer's identity.

[Consent form for access to data by a third party](http://www.lsha.org.uk/wp-content/uploads/2020/09/authorisation-form.docx)