



Leaseholders Privacy Notice

Your privacy is important to us. Some of our processing activities require different privacy notices to cover the specific activities. Please read the information below and, if you'd like more information please contact us.

United Welsh Housing Association Ltd
 Y Borth
 13 Beddau Way
 Caerphilly
 CF83 2AX
 Tel: 02920 858 100
 Email: data.protection@unitedwelsh.com

Our Data Protection Officer is Nia Roblin, Head of Governance and Compliance and you can contact her on the details above.

How do we use your personal information?

Most of the information we use, is information you have given to us about yourself or the people you live with via the application process or during your lease with us. However, some may be information that we are given by a third-party organisation such as your solicitors or it may be information that is publicly available.

Information Category	Why do we need it?	Legal Bases
Basic Details such as*: <ul style="list-style-type: none"> • Name • Address • Email Addresses • Phone Numbers • Date of Birth 	To be able to contact you to manage our responsibility as a freeholder	Contract, Legal Obligation
	To be able to provide you with a property and manage the sale process	Contract
	To be able to contact you to review our services	Legitimate Interest
Proof of Id* <ul style="list-style-type: none"> • Copies of valid ID documents 	To be able to provide you with a property	Contract
Financial Information* <ul style="list-style-type: none"> • Bank Information 	To be able to manage the service charge element to any lease agreements as a freeholder	Contract
Special Categories such as * <ul style="list-style-type: none"> • Criminal Convictions or Offences 	To be able to provide you with a lease and manage that lease in line with our legal obligations as a freeholder.	Legitimate Interest and secondary base of Consent
Housing Management such as* <ul style="list-style-type: none"> • Complaint management • ASB • Communal Area Repairs 	To be able to manage our responsibility as a freeholder for repairs that are service chargeable and ongoing housing relationship	Contract or Legal Obligation

	management such as ASB and Complaint Management	
Telephone call recordings	All telephone calls made to or from our customer service's numbers are recorded for training and monitoring purposes.	Legitimate Interest
CCTV	We operate a number of CCTV schemes at our offices, and some of our flats with communal entrances and spaces for crime prevention	Legitimate Interest
	Antisocial Behaviour Management in line with our lease agreements and duties as a Freeholder.	Legitimate Interest
	Health & Safety & legal requirements as a freeholder, landlord and a responsible employer.	Legal Obligation

Who do we share your personal data with?

To be able to fulfil our responsibilities as freeholder we will share your information with Celtic Horizons Ltd and Mears Ltd who provide our repairs and asset management service.

We may also share information with local authorities or the Police or other agencies for purposes such as support provision or crime investigation and prevention. We will only do this if there are laws that allow us to do so or we have a legitimate interest in doing so, when we are confident that you would reasonably expect us to. For example, when reviewing our services in order to make improvements that would benefit you.

We may also share your information when you have given us explicit consent to share your information.

How long do we keep your information?

We will keep your Lease Agreement documentation with us for 15 years after the lease expires or terminates, in line with our legal advisor's recommendations. Any wider data held in relation to your lease, application or property purchase process will be kept for 5 years after your lease expires or terminates.

After this, the information will be destroyed and disposed of in a secure manner in line with our privacy policies and procedures.

Any anonymised statistical reports and case studies created during the service will be kept forever as a record of the work undertaken by the Specialist Development Team.

Your Individual Rights

You have a number of individual rights under the General Data Protection Regulation (GDPR).

You have the right to access the personal information that we process about you. If you believe the personal information we hold on you is inaccurate or incomplete, you have the right to have it corrected or completed. Where we are using your information based solely on your consent, you also have the right to withdraw this consent at any time by contacting us.

You also have the right, in certain circumstances, to block the processing of your data, object to some types of processing or even have your data deleted or in some cases transferred to another organisation of your choice.

More information about all of these rights can be found from our website or by visiting www.ico.org.uk

Storage of your personal data

To enable us to provide you with a lease we will store your personal data on a number of electronic systems. Some of these systems are held on site in our privately owned corporate network or in a Cloud based service. Where the latter happens, we work closely with the providers to ensure the security of your information is in line with legal requirements.

We also use paper records when necessary, for example Lease Agreements, these are held in locked storage that is only accessible by relevant members of staff.

None of your information is ever stored or shared outside of the European Economic Area.

Not happy with any of this?

If you are not happy with any of the way we handle your data then please tell us using the contact details above.

If you are still not happy you are able to complain to the UK's supervisory authority for data protection – the Information Commissioner's Office by visiting www.ico.org.uk/concerns or by phoning them on 0303 123 1113.