

CUSTOMER PRIVACY STATEMENT Commercial Customers

Islington & Shoreditch Housing Association Limited

1. Your personal data – what is it?

Personal data means any information which relates to you or identifies you as an individual.

2. What type of personal information do we collect?

The following is all the types of personal information we may collect about you; however, not all of these will apply to all customers:

- Name
- Address
- Company address
- Company accounts
- Email address
- Telephone number
- Date of birth
- Bank details
- National Insurance Number
- Next of Kin
- CCTV images

We may collect this information in a variety of ways. Some of this information is collected from the Property Agency when you first become a customer. We may collect information through other interactions with you, such as when you contact our Business Team. From time to time we may also contact you to confirm the information we hold about you. We may also collect personal information about you from third parties. We would normally only do this with your permission but there are occasions when we may collect this data without your permission, for example for dealing with crime and antisocial behaviour.

Your data will be stored securely in a range of places including our IT systems and in locked filing cabinets.

3. Who are we?

ISHA is the data controller (contact details below). This means it decides how your personal data is used and for what purposes.

4. How do we use your personal data?

We may use your personal data to:

- **Provide essential services** – we collect information that will enable us to perform essential landlord functions such as collecting rent, providing repairs and managing your tenancy.

- **Contact you** – we use your contact information and preferences to get in touch regarding your tenancy, changes to our services and other opportunities;

5. What is the legal basis for processing your personal data?

We must have a legal basis for processing any data. One or more of the following conditions need to be met to process personal data:

- Processing is necessary to perform or enter into a contract
- Processing is necessary to comply with a legal obligation
- Processing is necessary to protect vital interests of the individual or another person
- Processing is necessary for the performance of a task carried out in public interest or in exercise of official authority vested in the controller
- Processing is necessary for the purpose of legitimate interest pursued by the controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the individual.
- Consent of the individual

We need to process data to enter into tenancy with you and to meet our obligations as a landlord.

6. Consequences of failing to provide data necessary for a contract

You are not obliged to provide personal data to us, however if you fail to provide data which is necessary for ISHA to carry out its landlord functions we may not be able to enter into a tenancy with you and where we already have a contract with you we may not be able to fulfil our full obligations to you under that contract.

7. Sharing your personal data

We will never sell your information to a third party. We do occasionally need to share your information with third parties to accomplish the goals stated above and to carry out our duties as a landlord.

Third parties with whom we may share personal information include:

- Repairs and maintenance contractors
- Out of hours call centre service
- External printers, translators or survey providers
- Police
- Statutory organisations such as local authority departments
- Our Regulator, auditors and utility companies or other organisations whom we are legally allowed to.

We will only share the minimum information necessary for the contractor to carry out their services on behalf of ISHA.

We may share your data with a third party for the detection and prevention of crime or

fraud. This may include personal data such as your name, address, contact details, door entry information and CCTV images.

We may undertake the transfer of your personal data to countries outside of the United Kingdom, for example when a processor holds their data in the EU. When doing this, we ensure we comply with the UK GDPR's rules around international transfers.

8. Children's information

ISHA does not normally process children's information as part of a commercial tenancy.

9. How do we keep your information safe?

We understand the importance of security of your personal information and take appropriate steps to safeguard it. We have internal policies and controls in place to make sure that your data is not lost, accidentally destroyed, misused or disclosed and is not accessed except by our employees in the proper performance of their duties. All staff who have access to your data are trained in how to use your information in a secure and sensitive way. All hard copy personal files are kept in locked cabinets when not in use. Information on e-mails is encrypted or password protected and information in databases is password protected. We regularly review our IT provision to make ensure security and that we have is fit for purpose.

Where we engage third parties to process data on our behalf we do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

10. Automated Decision Making

We do not use automated decision making.

11. How long do we keep your personal data?

We keep data in accordance with our data retention policy.

We maintain current tenant records for the duration of the tenancy or as long as money is owing on the account.

We maintain former tenant records for 6 years for accountancy and tax purposes following the termination of the tenancy after which all data will be destroyed.

12. Your rights and your personal data

Unless subject to an exemption under data protection legislation, you have the following rights with respect to your personal data:

- The right to request a copy of your personal data which ISHA holds about you; Please contact dataprotection@isha.co.uk if you want access to any of your personal data.
- The right to request that ISHA corrects any personal data if it is found to be inaccurate or out of date;
- The right to transfer personal data from our electronic processing system to another organisations electronic processing system;
- The right to lodge a complaint with the Information Commissioners Office;

- Where we rely on your consent as your legal basis to process your personal data, you have the right to withdraw your consent and ask for your data to be deleted or restrict/object to some elements of the processing. As we explain above we will not rely on consent in many cases.

13. Erasure (Your Right to be Forgotten)

You have the right to ask us to delete personal information we hold about you. You can do this where:

- the information is no longer necessary in relation to the purpose for which we originally collected/processed it
- you withdraw consent
- you object to the processing and there is no overriding legitimate interest for us continuing the processing
- we unlawfully processed the information
- the personal information has to be erased in order to comply with a legal obligation

We can refuse to erase your personal information where the personal information is processed for the following reasons:

- where we have an overriding legitimate interest for continuing with the processing
- to exercise the right of freedom of expression and information
- to enable functions designed to protect the public to be achieved eg government or regulatory functions
- to comply with a legal obligation or for the performance of a public interest task or exercise of official authority
- for public health purposes in the public interest
- archiving purposes in the public interest, scientific research historical research or statistical purposes
- the exercise or defence of legal claims

14. Further processing

If we wish to use your personal data for a new purpose, not covered by this Privacy Statement, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

15. Who do you contact?

To exercise all relevant rights, queries of complaints please in the first instance contact ISHA at dataprotection@isha.co.uk or at 0300 131 7300.

16. How can you complain?

If you are not happy with the way your information is being handled, or with the response



received from us you can contact the Information Commissioners Office on 0303 123 1113 or via their website: <https://ico.org.uk/make-a-complaint/> .

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