



# PRIVACY POLICY AND NOTICE – CUSTOMERS

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# PRIVACY POLICY AND NOTICE

## DOCUMENTATION MASTER SHEET

Amendments to this Document are Detailed Below.

Version Number	Date Amended	Comments	Date Approved	Author	Approved By
01	23/06/2023	Complete re-write of Policy with support from Data Protection People	30/06/2023	DPP/FH	SLT
02	17/10/2024	Reviewed and slight adjustments made, and added notice (no.10)	13/11/2024	Alleema Sabar	SLT
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# PRIVACY POLICY AND NOTICE

## 1. INTRODUCTION

Gloucester City Homes (GCH) are committed to respecting your privacy and security of your personal information. This Policy explains how GCH may use personal information we collect when you use our services. This Policy explains how GCH complies with the law on data protection and what your rights are. For the purpose of data protection, GCH will be the data controller of any of your personal information as defined in Article 4(7) of the UK GDPR.

This Policy applies to all users of GCH services. By services, we mean all tenants and visitors to our website. This policy does not form part of any contract.

References to “we,” “our” or “us” in this privacy policy are to GCH of Railway House, Bruton Way, Gloucester, GL1 1DG.

Our Data Protection Officer, oversees our compliance with data protection legislation. Contact details are in the “Contacting Us” section at 12 below.

## 2. PERSONAL DATA

When you, interact with our staff, face-to-face or through digital methods, you may provide us with, or we may obtain, personal data about you and your family. This may include, but is not limited to:

- Name and date of birth
- Address
- Contact details (telephone/mobile/e-mail)
- Details of anyone authorised to act on your behalf if applicable
- National Insurance Number
- Banking Details
- Proof of Housing Eligibility
- Photo ID, bank statements, payslips or income details
- Other personal information that will vary on a case by case basis to help us resolve breach of tenancy, alleged anti-social behaviour or fraud.
- Movement through CCTV footage and other information obtained through electronic means, such as swipe card and QR codes.
- Information in relation to anti-social behaviour incidents, including complaints, witnesses, relevant details of visits to the property by agencies.
- Telephone recordings

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## 3. SPECIAL CATEGORIES OF PERSONAL INFORMATION AND CRIMINAL CONVICTIONS

GCH may also collect, store, and use “special categories” of more sensitive personal data about the following:

- Racial or ethnic origin;
- Religious, philosophical or other similar beliefs;
- Physical or mental health or condition;
- Sexual life or sexual orientation;
- Convictions, proceedings and criminal acts;
- Political opinions;
- Trade union membership.

This information that we process will be done only on one of the following bases:

- The processing is necessary for reasons of substantial public interest, on a lawful basis.
- It is necessary for the establishment, exercise, or defence of legal claims.
- It is based on explicit consent. Explicit consent must be freely given, specific, informal and unambiguous. It must be provided in a clear statement whether written/spoken.
- It is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law.

## 4. WHERE WE COLLECT YOUR DATA

Gloucester City Homes collects information from you via a variety of sources, including when you apply for one of our properties or services, complete one of our forms, when you call, write, e-mail or meet with us or respond to a survey. We may collect information when you use our social media sites, websites or self-service portal. Our landline telephone calls are recorded for training and monitoring purposes and our recordings are usually held for a period of 90 days.

We may also receive information about you from third parties including:

- Your council or benefits office relating to your housing.
- Prior landlords and other connected relevant interested parties when you apply for housing.
- Police, welfare or support organisations dealing with you.
- Councillors, MPs or other representatives acting on your behalf/instruction.
- Financial institutions when you apply for our services.

If, for any reason, you are providing us with details of others, e.g. family members and emergency contacts they have a right to know and to be aware of what personal information we hold about them, how we collect it, how we use it and how we may share that information.

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Please share this policy with those whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the “Your rights in relation to personal information” section in 1.9 below.

## 5. USES MADE OF YOUR PERSONAL DATA

GCH may process personal data about you for the following purposes:

- To manage and support you on a tenancy or leasehold agreement or contract, contract for provision of goods and/or services, held by you and us, more specifically:
  - Managing your account charges and payments, including arrears.
  - Managing the repairs, maintenance and adaptations of our properties.
  - Ensuring tenancy (or contract) conditions are complied with, such as dealing with anti-social behaviour or fraud.
  - Complying with relevant legislation and regulation.
- To conduct research and statistical analysis to help improve our business processes and the services offered to our customers, as well as to evaluate our performance against other benchmarks. When possible, statistical information is anonymised or pseudonymised.
- To conduct surveys regularly and periodically relating to our services in order to gauge satisfaction and make improvements based on feedback.
- To operate a range of information and communications systems and technologies to help us to communicate with you and for efficient operation of the business. These communications can be categorized as:
  - To signpost supporting services and related products, services, and events linked directly with the contract you hold with us;
  - To carry out direct marketing activities;
  - To respond to you on your interest in our services;
  - To respond to you on any enquiries you make; and
  - To confirm your identity when our customer service centre contact you.
- To operate our additional voluntary services including organising community events, providing debt advice, adapting the property you live in, selling properties and gathering information to improve our services.
- To carry out marketing activities such as:
  - Offering particular support services that we feel may be of interest or benefit;
  - Telling you about ways to be involved with giving feedback on services. You can opt in and out of marketing by contacting us;
  - To keep you updated with the latest news and information and closed linked products/services.
- We collect and process personal and sensitive information about you for the provision of products, services, and account management and also to support your relationship with us, as a customer, supplier, board or tenant representatives or member of staff.

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- Recording telephone calls for training and monitoring purposes.
- As necessary to carry out our legitimate business activities.

As an organisation we do not use profiling, but we do use automation in some decision-making processes. We use an automated system to prioritise Income (arrears) actions, but the final decision is made by an Income Account Manager using other factors other than system suggested actions. We use an automated system for Gas Servicing, in terms of the raising the job ticket, scheduling the work, and communication with the propriety occupier in relation to this important and legally required work.

## 6. LAWFUL BASIS FOR THE PROCESSING

The lawful basis for most of our personal data processing of your information is where it is necessary for the purposes of GCH's legitimate interests. Where GCH relies on legitimate interests as a reason for processing data it has considered whether or not those interests are overridden by the rights and freedoms of service users and has concluded that they are not.

The lawful basis may in some instances be because we have your consent to process your personal information. Where this applies this will be made clear to you and you can withdraw your consent at any time.

We may also process your information for other reasons, such as where we are under a legal or contractual obligation to process or disclose the information; or where we need to protect your vital interests or those of another person.

If you do not provide us with the requested personal information, we may not be able to properly perform our contract with you or comply with legal obligations. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to provide our services to you and may not be able to offer you a tenancy, lease, or contract with us.

Some personal information is treated as more sensitive (for example medical or diversity information). The legal basis for processing these special categories of personal information is more limited. To process special categories of personal data lawfully, we must identify a specific lawful basis for the processing, which may be because we have your consent; we need to protect the vital interests (health and safety) of you or another person; you have already made your personal information public; we or another person needs to bring or defend legal claims; there are substantial public interest grounds.

In addition, when processing special category and criminal offence data, we will process your information under the lawful bases provided under section 3 Special Categories of Personal Information and Criminal Convictions.

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Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "Contacting us" section 12 below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent, and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain services to you.

## 7. DISCLOSURE OF YOUR PERSONAL DATA

We share personal data with the following parties:

- Contractors and Partners of Gloucester City Homes Limited for the purpose of providing a service to you.
- Any party approved by you to act on your behalf.
- Other service providers to our business: for example, CCTV contractors and IT services. All our service providers and other entities in the group are required to take appropriate security measures to protect your personal information.
- Police, law enforcement and security services: to assist with the investigation and prevention of crime and the protection of national security.
- Inter-agency partnerships, including key agencies and professionals dedicated to the protection of children and vulnerable adults: to ensure protection from abuse and to develop appropriate strategies to respond to the needs of our tenants and clients.
- In ad-hoc disclosures as reasonably necessary to be carried out.

## 8. TRANSFERRING YOUR DATA INTERNATIONALLY

The personal information collected by GCH may be transferred to and stored in countries outside of the UK. Some of these jurisdictions require different levels of protection in respect of personal information and, in certain instances, the laws in those countries may be less protective than the jurisdiction you are typically resident in. We will take all reasonable steps to ensure that your personal information is only used in accordance with this privacy policy and applicable data protection legislation and is respected and kept secure. Where a third party processes your data on our behalf, we will put in place appropriate safeguards as required under data protection legislation. For further details please contact us by using the details set out in the "Contacting us" section 12 below.

## 9. HOW LONG WE KEEP YOUR PERSONAL DATA

The duration for which we retain your personal data will differ depending on the type of data and the reason why we collected it from you. However, in some cases personal data may be

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retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement, we retain all physical and electronic records for a period of six years after a tenancy has ended. Exceptions to this rule are:

- CCTV records which are held for no more than 30 days unless we need to preserve the records for the purpose of prevention and detection of crime.
- Information that may be relevant to personal injury claims or discrimination claims may be retained until the limitation period for those types of claims has expired. This can be an extended period as the limitation period might not start to run until a long time after your employment with us.
- Where a safeguarding concern/s has arisen during the tenancy, the records are retained for a period of 12 years from the end of the tenancy.
- Telephone recordings will be kept for a period of 90 days.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you move home or change your phone number or email address. Alternatively, you can contact us using the details below.

## 10. PRIVACY NOTICE

The Privacy Notice describes the rights you have in relation to personal data and who is responsible for data privacy.

### Data retention:

We will hold information about you in our data systems only for as long as we need to hold it which is generally as follows:

- As long as you continue to use our services we will retain and process information about you.
- Any personal data linked to insurance claims is retained indefinitely.

We reserve the right to review our Retention Policy and to shorten our retention periods if we feel this is appropriate. We will not lengthen our retention periods without letting you know.

## Your Rights in Relation to Personal Data

The GDPR grants you the following 'information rights' concerning your data:

### Right of Access

You have the right to obtain confirmation from GCH as to whether personal data concerning you is being processed and, where that is the case, access to copies of that data.



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## Right to Rectification or Erasure (Right to be Forgotten)

If you feel that any data that we hold about you is inaccurate you have the right to ask us to correct or rectify it. You also have a right to ask us to erase information about you where you can demonstrate that the data we hold is no longer needed by us, or if you withdraw the consent upon which our processing is based, or if you feel that we are unlawfully processing your data. Your right of rectification and erasure extends to anyone we have disclosed your personal information to and we will/shall take all reasonable steps to inform those with whom we have shared your data about your request for erasure.

## Right to Restriction of Processing

You have a right to request that we refrain from processing your data where you contest its accuracy, or the processing is unlawful and you have opposed its erasure, or where we don't need to hold your data anymore but you need us to in order to establish, exercise or defend any legal claims, or we are in dispute about the legality of our processing your personal data.

## Right to Data Portability

You have the right of access to information we hold about or concerning you and/or to have it transferred to another data controller in some circumstances. If you would like to exercise this right you should contact our Data Protection Officer.

## Right to Be Informed

You have the right to be informed about the collection and use of your personal data, including the purpose of processing the personal data, how long it is kept for and who it will be shared with. This information is set out in the Privacy Notice.

## Right to Withdraw Consent

If the lawful basis for processing is consent, you have the right to withdraw that consent.

## Right to Object

You have a right to object to our processing of your personal data where the basis of the processing is our legitimate interests including but not limited to direct marketing and profiling.

## Rights in Relation to Automated Decision-Making and Profiling

GCH does perform some automated decision-making, as outlined in section 1.5 *Uses Made of Your Personal Data*, however any decision-making carried out on the back of this is overseen by a member of the team.

## Rights of Complaint

You also have a right to lodge a complaint about any aspect of how we are handling your data with the UK's Information Commissioner's Office. Please see information about this below. You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. However, some have no conditions

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attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

If you would like to find out more about your rights please contact our Data Protection Officer.

## Information Governance

We have an appointed Data Protection Officer (DPO) who is responsible data privacy and ensuring our compliance with our legal obligations set out in the UK GDPR. The DPO monitors our data protection compliance and provides advice and guidance as to how we can improve our data handling practices. The contact details of our DPO are available on our website and may change from time to time. At the time of writing, our DPO is Rebecca Andrews.

We reserve the right to change our DPO without informing you directly and will publish contact details on our website.

## 11. YOUR RIGHT TO LODGE A COMPLAINT WITH THE SUPERVISORY AUTHORITY

If you wish to exercise any of your rights concerning your personal data, you should contact GCH's Data Protection Officer with the details below. If you are not satisfied with the response you receive, you have the right to lodge a complaint with the supervisory authority. In the United Kingdom this is:

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

(t) 0303 123 1113  
(e) [casework@ico.org.uk](mailto:casework@ico.org.uk)

While this Privacy Policy sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "Contacting us" section below.

## 12. CONTACTING US

In the event of any query or complaint in connection with the information we hold about you, please email [dpo@gch.co.uk](mailto:dpo@gch.co.uk) or write to us at Railway House, Bruton Way, Gloucester GL1 1DG.

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Our Data Protection Officer can be contacted by email: [dpo@gch.co.uk](mailto:dpo@gch.co.uk) or telephone: 01452 424344.

## 13. REVIEW

This policy and notice will normally be reviewed triennially to ensure that it remains fit for purpose, unless an earlier review is required due to regulatory, statutory or other requirements.