

Platform Housing Group's Privacy Notice

The Platform Housing Group includes Platform Housing Group Limited, Platform Housing Limited (formerly Waterloo Housing Group Limited and Fortis Living Limited), Platform Property Care, ESHA (Developments) Limited, and Waterloo Homes Limited.

This privacy notice applies to customers of Platform Housing Group including tenants, leaseholders, shared owners, applicants for housing (whether for a tenancy, lease, part or outright ownership.) It lets you know what happens to any personal data that you share with us, or any data that we may collect from or about you. It applies to all products and services and instances where we process your personal data.

Changes to this privacy notice

We may change this privacy notice from time to time by updating the Privacy Notice page on our website in order to reflect changes in the law and/or our privacy practices. We encourage you to check this privacy notice for changes whenever you visit our website – www.platformhg.com or log in to your online account.

Platform Housing Group and our Data Protection Officer

Our contact address is: Platform Housing Group, 1700 Solihull Parkway, Birmingham Business Park, Solihull, B37 7YD.

We are a data controller of your personal data. We are registered with the Information Commissioner's Office for the processing of personal data. To see the details of our registration visit www.ico.org.uk.

We have a dedicated Data Protection Officer (DPO). You can contact the DPO by emailing dpo@platformhg.com or by writing to the above address, marking it for the attention of the Data Protection Officer.



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1. What personal information we process

Personal information that we will process in connection with providing you with a landlord service, home sales service or appropriate advice and support includes:

- Personal details, such as title, full name, contact details, photographic ID
- Your date of birth, gender and/or age
- Details of joint tenants, leaseholders, applicants and purchasers
- Family and household members, so we know who is living in the property, and can adapt any services to meet their needs
- Records of your contact with us such as through our telephone call centre and online forms
- CCTV images if you visit a property, office or communal facility covered by a CCTV system
- Property addresses and occupation dates you have rented, leased or bought, currently or in the past with Platform Housing Group or its predecessor organisations
- Information associated with managing your tenancy, lease, property purchase or application including bank details; payments, visits, contacts, letters, interviews or legal enforcement actions
- Marketing messages sent about our homes and services to you and analysis of that data.
- Information we obtain from third parties, if relevant, see section 5 below for more details
- Fraud, debt and theft information, if relevant, including details of money you owe, suspected instances of fraud or theft, and details of any devices used for fraud
- Reasons for the risk of possible homelessness, if relevant
- Criminal records information, if relevant, to manage, risk assess, and adapt services due to any known criminal or anti-social behaviour activity
- Information about your health or if you are a vulnerable customer, if relevant

- Information about your property, if relevant, such as location, value, number of rooms, property type, permissions given, guarantees and building work you've had done
- Humidity, temperature, thermostat settings, boiler performance, sound levels, light and motion where Smart Device Sensors are installed in your home by Platform Housing Group
- Financial details about you, if relevant, such as your household income, source of income, details of your savings, borrowings and loans, and details of other expenditure
- Specifically for "Heat Network" customers details of supply start dates, end dates, indicative annual consumption, indicative annual bills, actual tariff charges, payments, refunds, interruptions to supply, additional support needs, complaints relating to service provision and their responses, resolutions and any referrals.
- Information about your employment status, if relevant
- Your National Insurance number if required
- Information about your property occupier status, such as whether you are a tenant, live with parents or are an owner occupier of the property where you live at the time of your application
- Your nationality, if relevant
- Information about your marital status, family, lifestyle or social circumstances, including religion, ethnic origin, sexuality, age and gender to monitor that our service provision is not discriminatory and reflects the diversity of our local communities
- Insights about you and our customers gained from analysis or profiling of customers
- Where relevant, information about any guarantor which you provide in any application
- Third party transactions; such as where a person other than the account holder makes a payment, contacts us or acts on your behalf
- Records of your internet browsing activity if you access Platform Housing Group's Public Wi-Fi services including site names, category and device names and IP addresses
- Records of your webchat including email address, user name, Chat transcripts, completed surveys

- Anonymised Operating System/Browser information - which is only for the purposes of product development and cannot be tied back to a specific session or user.

2. How we obtain your personal information

We'll collect personal information from the following sources (this list is not exhaustive):

- From you directly, and any information from family members, associates or guarantors
- From your mortgage providers, referees, employers or guarantors if purchasing a property.
- Information generated about you when you use our homes and services including our public Wi-Fi services and Smart Devices
- From a 3rd Party organisation such as other Regulators, Registered Social Landlords, local authorities, utility companies, social services, NHS, Police, Fire and Rescue Services.
- Business partners (for example, property maintenance contractors)
- From other sources such as fraud prevention agencies, credit reference agencies, other lenders, HMRC, DWP, debt recovery and/or tracing agents and other organisations, police and law enforcement agencies.
- Publicly available information (for example, telephone directory, social media, internet, news articles)

3. How we use your personal information

We use your personal information for the following purposes:

- Assessing an application for a tenancy, lease, house sale or service, including considering whether or not to offer you the tenancy, lease, sale or service
- Managing the tenancy, lease, application, sale or service request you have with us
- Specifically for "Heat Network" customers, to provide energy supply and payment collections services directly to you,
- To comply with our legal obligations
- Updating your records, tracing your whereabouts and recovering debt
- To monitor and to keep records of our communications with you and our staff

- To develop and/or test services and internal processes
- To improve the operation of our services and that of our business partners
- To comply with, and follow guidance and best practice under any change to rules and requirements by governmental and regulatory bodies
- For management and auditing of our business operations
- To carry out checks at fraud prevention agencies where relevant
- For market research and analysis and developing statistics
- Assessing and profiling aspects of your home's performance such as energy efficiency and condensation
- For direct marketing communications and related profiling to help us to tell you about relevant services and events
- To keep you informed of company news, community events, health and fitness events, safety messages, universal credit reform and other Government led policy changes
- To provide personalised services to you, such as tailoring our homes and services and our digital offerings
- Sharing your personal information with third parties to help provide landlord and support services
- To facilitate the sale, merger or take-over of one or more parts of our group of companies.
- Investigating and managing reported acts of Anti -Social Behaviour

4. The legal grounds for processing your personal information (including when we share it with others)?

We rely on the following legal basis to use your personal information:

- Where it is needed for Performance of a Contract. This is your tenancy or lease or purchase of a property or other service agreement (such as a "Heat Supply Agreement.")
- Where it is in our legitimate interests to do so, such as:

- Managing your tenancy, lease, property sale or service request, updating your records, tracing your whereabouts to contact you about your account and doing this for recovering debt (where appropriate)
- To perform and/or test the performance of, our products, services and internal processes
- To follow guidance and recommended best practice of Government and regulatory bodies
- For management and audit of our business operations
- To comply with our Commitment to Refer (Duty to Refer under the Homelessness Reduction Act 2017)
- To carry out checks at fraud prevention agencies where relevant
- To carry out monitoring and to keep records of our communications with you and our staff
- For market research and analysis and developing statistics
- Assessing and profiling aspects of your home's performance such as energy efficiency and condensation
- To provide personalised services to you, such as tailoring our homes and services and our digital offerings
- For direct communications to help us to tell you about relevant services and events
- To inform utility and council tax companies of occupants, occupancy dates, forwarding address, and meter readings to ensure accurate billing can take place
- For "Heat Network " customers to inform our metering and billing service provider of your occupancy dates, energy and hot water consumption, tariff charges and any priority service provision requirements.
- Where we need to share your personal information with people or organisations in order to run our business or comply with any legal, contractual and/or regulatory obligations
- Where we contact you through automated text, email or other electronic messaging to remind you of appointments, payments due or to take part in customer satisfaction surveys

- To comply with our legal obligations
- With your consent or specific consent:
 - For direct marketing communications
 - For processing of special categories of personal data such as about your health, if you are a vulnerable customer or some criminal records information
 - For some of our statutory and regulatory returns
- For a public interest, such as:
 - Processing of your special categories of personal data such as about your health, criminal records information (including alleged offences), or if you are a vulnerable customer
 - Investigating and managing reported acts of Anti -Social Behaviour
- For your vital interests where you may be physically or legally incapable, such as:
 - Providing personal details, health and vulnerabilities in the event of a medical emergency where you are unable to provide those details yourself.

5. 3rd Parties and organisations we share information with

As stated in section 2 and 3 above we may source or share personal information with 3rd parties.

Below is a list of the types of organisations with whom some data sharing occurs, where it is relevant to do so and for the reasons stated. Please note, your personal information will only be shared with an organisation where it is relevant to you.

Third party sharing

Type of Organisation	Reason for Sharing Data	Legal Basis for Processing Data
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Asbestos Survey Provider	Asbestos Surveys	Performance of Contract, Legitimate Interest, Legal Obligation
Choice Based Lettings scheme Provider	Allocation of properties within Platform Housing Group / Local Authority Lettings Policy	Statutory & Legal obligations, Legitimate Interest
County Courts	Application for Money Order or Judgement, Application for Court Order, Undertaking or Injunction	Performance of Contract, Legitimate Interest, Legal Obligation
Data Protection Regulator	In response to Queries and complaints from Customers and Members of Public	Legitimate interest, Legal obligation
Direct Debit Service Provider	Provision of Direct Debit Service	Performance of Contract, Statutory & Legal obligations, Legitimate Interest
Energy Utility Companies	Correct Billing Dates / Prevention & Detection of Fraud, Vulnerable person data in an emergency as defined by the Civil Contingencies Act 2004	Statutory & Legal obligations, Legitimate Interest, Public Interest, Vital Interest

Fire & Rescue Services	Identification of properties with Oxygen bottles / Hoarding Issues, Vulnerable person data in an emergency as defined by the Civil Contingencies Act 2004	Public Interest, Vital Interests, Legitimate Interest
Governmental Departments	CORE Letting & Sales data, HMRC, Research (Right to Buy or Right to Acquire and Voluntary Right to Buy)	Statutory & Legal Obligations, Specific consent, Performance of Contract
Health Authority including GP surgeries	Provision and monitoring of a Falls response service, Occupational Therapy Assessments, Vulnerable person data in an emergency as defined by the Civil Contingencies Act 2004	Performance of Contract, Legitimate Interest, Public Interest, Vital Interests,
Heat Trust & the Energy Ombudsman	For dispute and complaints resolution in connection with energy supplied through Platform's "Heat Network"	Performance of Contract , Legitimate Interest, Legal Obligation
Home Contents insurers	To offer access to affordable home contents insurance scheme	Specific consent
Housing Ombudsman	Response to complaint made to the Housing Ombudsman	Legitimate interest, Legal obligation

Inland Revenue	Collection of Tax , Prevention and detection of fraud	Statutory & Legal Obligations
Local Authorities	Council Tax Assessment, Housing Benefit Assessment, Homelessness Investigations, Environmental & Other Statutory Nuisance Investigations, Private Sector Aids & Adaptations, Commitment to Refer (Duty to Refer under the Homelessness Reduction Act 2017), safeguarding referrals, Vulnerable person data in an emergency as defined by the Civil Contingencies Act 2004	Statutory & Legal obligations, Specific Consent, Legitimate Interest, Public Interest, Vital Interest
Maintenance Contractors	Provision of Property Improvement Works	Performance of Contract, Legitimate Interest
Metering & Billing Service Provider	Provision of metering and billing services For “Heat Network “	Performance of Contract, Legitimate Interest
Mortgage Providers , Valuers & Conveyancing Solicitors	Provision of our Home Sales Service	Performance of Contract, Legitimate Interest

Online Fraud Prevention Service Provider	Prevention & detection of Tenancy Fraud	Legitimate Interest
Online Marketing Service Providers	Marketing of Platform Housing Group Homes & Services	Specific Consent
Out of Hours/Call Alarm Contact Service Provider	Provision of Call Alarm Monitoring/Out of Hours Repairs & Emergency Contact Service	Performance of Contract, Legitimate Interest, Vital Interests
Payment Service Providers	Receipt and detail of Payments made	Performance of Contract, Legitimate Interest
Police Forces	Prevention & detection of Crime / Management of Tenancy Breaches, Vulnerable person data in an emergency as defined by the Civil Contingencies Act 2004	Public Interest, Vital Interest, Legal obligation, Legitimate Interest
Property Performance Smart Sensor Data Providers	Provision of sensor data (Temperature, Light, Motion, Air Pressure, Humidity. Carbon Monoxide, and Boiler Flow rates) to evaluate property performance before , during or after improvement works or other interventions.	Legitimate Interest

Registered Social Landlords	Applications and references for Lettings, Transfers and Mutual Exchanges, Fraud, Vulnerable person data in an emergency as defined by the Civil Contingencies Act 2004	Performance of Contract, Legitimate Interest, Public Interest, Vital Interest
Support Service Providers	Provision of identified and agreed support requirements	Legitimate Interest, Vital Interest, Performance of Contract, Specific Consent
Voluntary Sector Organisations	Vulnerable person data in an emergency as defined by the Civil Contingencies Act 2004	Public Interest, Vital Interest
Water Utility Companies	Correct Billing Dates / Prevention & Detection of Fraud, Legal obligation on landlords (Welsh Water customers), Vulnerable person data in an emergency as defined by the Civil Contingencies Act 2004	Statutory & Legal obligations, Legitimate Interest, Public Interest, Vital Interest
Web Service Provider	Provision of Online Tenancy Account	Performance Of Contract

We use a number of data processors who act on our behalf to process personal data.

All these organisations are subject to the same legal rules and conditions for keeping personal confidential data secure. We ensure that our partner agencies have contracts / data processing agreements which outline that your information is processed under strict conditions and in line with the law. Platform Housing Group Limited remains the data controller (the organisation responsible for determining the purposes for which and the manner in which personal data is used under the Data Protection Act and General Data Protection Regulation) of such information at all times.

6. How and when you can withdraw consent

When we are relying upon your consent as stated in Section 4 to process personal information, you can withdraw this by contacting us using the details at the bottom of this page (unless there is a legal basis for processing). Examples of where you may withdraw your consent are:

- For direct marketing communications
- For some processing of special categories of personal data such as your ethnicity, religion, sexuality, health, if you are a vulnerable customer or some criminal records information
- For some of our statutory and regulatory returns

7. How your personal information is kept secure

We have put in place appropriate operational, technical and security measures to reduce the risk of your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. This includes use of encryption where relevant. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

We may transfer personal data to a country not in Europe where data subjects' rights may not be adequately protected or enforceable. Whenever we arrange for international transfers of data overseas we will ensure the suitable arrangements are in place to provide

suitable safeguards for the people whose information we transfer. When we appoint overseas data processors we check that suitable arrangements are in place such as European Commission Adequacy Decisions, Standard Contractual Clauses, or other permitted mechanism.

8. What to do if you need to make changes to your personal information

You should tell us so that we can update our records using the details in the Contact Us section of our website, by calling our Contact Centre on **0333 200 7304** or by logging on to your account via the Online Portal. We'll then update your records where appropriate.

9. Providing your personal information to us

You are obliged to provide us with certain information when we enter into a contract with you for the purpose of a tenancy, lease, home sales, landlord or "Heat Network" service. In other instances, where providing some personal information is optional, we'll make this clear.

10. How we monitor and process your personal information

In this section monitoring means any; listening to, recording of, viewing of, intercepting of, or taking and keeping records of calls, email, text messages, social media messages, CCTV, in person (face to face) meetings and other communications.

We may monitor where permitted by law and we'll do this where the law requires it, or to comply with regulatory rules, to prevent or detect crime, in the interests of protecting the security of our communications systems and procedures and for quality control and staff training purposes. This information may be shared for the purposes described above.

11. Automated Decision Making and Profiling

We may profile your personal data in automated processes to support the delivery of our services.

Profiling is a form of automated processing of personal information for the evaluation, analysing or prediction of your economic situations, preferences, reliability, behaviour, location, and may be used to, for example:

- Help identify customers who may be vulnerable, isolated, or experiencing difficulties in maintaining contact with us.
- Detect customers who may be at risk of service disruption, enabling us to proactively offer support before issues arise.

At present, we do not use profiling to make decisions that have a legal or similarly significant effect on you.

In the event of any future use of automated decision making about you that has a legal or other significant effect, you have the right to request human review of that decision.

12. How long we retain your personal information

Unless we explain otherwise to you, we'll hold your personal information based on the following criteria:

- For as long as we have reasonable business needs, such as managing our relationship with you and managing our operations
- For as long as we provide goods and/or services to you and then for as long as someone could bring a claim against us; and/or
- Retention periods in line with legal and regulatory requirements or guidance as detailed in Platform Housing Group's Data Retention Policy.

Most processing activities fall within the tenancy record and are usually retained for a period of 7 years from the end of the tenancy or 12 years from the end of a lease. However in some cases we are required to keep the record for longer, for example, where the record includes a safeguarding referral or a care plan for a child. The retention period for any other activities are specified in the Retention Schedule.

13. Your rights under data protection laws

These rights don't apply in all circumstances. If you wish to use any of them, we'll explain at that time if they are applicable or not.

- The right to be informed about the processing of your personal information
- The right to have your personal information corrected if it is inaccurate and to have incomplete personal information completed
- The right to object to processing of your personal information
- The right to restrict processing of your personal information
- The right to have your personal information erased (the "right to be forgotten")
- The right to request access to your personal information and to obtain information about how we process it
- The right to move, copy or transfer your personal information ("data portability")
- Rights in relation to automated decision making which has a legal effect or otherwise significantly affects you

You have the right to complain to the Information Commissioner's Office which enforces data protection laws: <https://ico.org.uk/>

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

You can also contact us using the details below.

14. Your right to request access to your personal information

The current Data Protection law provides individuals with rights over how their personal data is processed. These rights entitle you to a copy of your information; confirmation that your data is being processed; confirmation on how and why your data is processed; the purposes for which it is used; and to whom your data may be disclosed.

Further information can be obtained by emailing: dpo@platformhg.com or contacting us using the details below.

15. Opting out of Marketing

You can opt out of any direct marketing email or text by following the unsubscribe links. If you receive a marketing call from us, you can ask the person who called you to opt you out. You can also write to us at: Platform Housing Group, 1700 Solihull Parkway, Birmingham Business Park, Solihull, B37 7YD, marking it for the attention of the Data Protection Officer.

16. Our website

Cookies

Cookies are small text files which, with your permission, are placed on your computer's hard drive by websites that you visit. They are widely used to help websites work more efficiently, to analyse web traffic and to gather information about your preferences.

We use traffic log cookies to identify which pages of our website are being used. This helps us improve our website and tailor it to our visitors' needs. We only use this information for statistical analysis purposes and then the data is removed from the system. Cookies do not enable us to identify you personally and do not give us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from using all the functions of the website.

Links to other websites

Our website contains links to other third-party websites of interest. When you use these links to leave our site, please be aware that we do not have any control over these external websites. We cannot be responsible for the protection and privacy of any information which you provide whilst visiting these sites and they are not governed by this privacy statement. You should be careful about the information you provide and look at the privacy statement applicable to the individual website.

Google Analytics

Our website uses Google Analytics to analyse the traffic on our website. For more information on Google's services please go to www.google.com/analytics

17. Contacting Us

If you have any questions about this privacy notice, or if you wish to exercise your rights you can contact the Data Protection Officer (DPO), by emailing dpo@platformhg.com

Our contact address is Platform Housing Group, 1700 Solihull Parkway, Birmingham Business Park, Solihull, B37 7YD, marking it for the attention of the Data Protection Officer.