

Contract Holder Privacy Notice

Cadwyn Housing Association Limited ("Cadwyn", "we", "our", "us") is a Registered Social Landlord based in Cardiff. This Privacy Notice applies to tenants, residents or guarantors ("you", "your"). We are committed to protecting your personal information and being transparent about how we collect and use it. All personal information that we hold about you is held and used strictly in accordance with the provisions of the United Kingdom General Data Protection Regulation ("UK GDPR") and the Data Protection Act 2018 ("DPA"). Personal information means any data from which you can be identified, either in a hard copy format or in electronic data. Cadwyn is a data controller, which means that we are responsible for deciding how we hold and use your personal information. Cadwyn's ICO data protection registered number is Z6736414. Its Co-operative & Community Benefits Societies registered number is 18805R and its Welsh Government registered number is L019. .

Personal Information That We Hold About You

We will collect sufficient (but not excessive) personal information; keep it up to date; store and destroy it securely; protect it from loss, misuse, unauthorised access and disclosure; and ensure that appropriate technical measures are in place. Most of the personal information that we hold, and use is provided to us directly by you or by the local authority. The personal information that we collect, store and use about you *may* include any of the following:

- personal contact details such as your name, home address, telephone numbers, personal email addresses and date of birth
- personal contact details of joint tenants, other residents and guarantors
- your nationality and immigration status
- whether you have a right to live in the UK
- why you have applied for housing
- contract holder reference number

- next of kin, dependants and emergency contact details
- references from your previous landlord(s)
- references from your previous employer(s)
- references from your bank
- bank account details
- whether you are a member or former member of the Armed Forces
- information from credit reporting agencies
- National Insurance and NHS numbers
- passport and driving licence information
- other information on the Common Housing Register
- information about criminal convictions and offences
- information provided on the Equal Opportunities Monitoring Form
- organisations that provide services to us, for maintenance and repairs etc.
- health and financial information
- photographs and CCTV images
- rent payment records
- recovery of arrears, claims or possession proceedings
- repair and health & safety records
- contract holder deposit information
- credit reference agencies
- Council Tax and utilities records
- Universal Credit and housing benefit records
- general correspondence (letters, emails, text messages etc.)
- other residents – if we receive a complaint, such as antisocial behaviour

We also generate additional personal information in the course of your tenancy with us so that our records are kept up to date. We may collect additional personal information from the Department for Work and Pensions (DWP), [law enforcement agencies](#), etc.

The Legal Basis and Purpose for Collecting and Using Your Personal Information

The legal basis for Cadwyn using your personal information vary depending on which service we are providing to you:

- It is necessary for the performance of your [agreement](#) with Cadwyn or that you have provided your information on the Common Housing Register before entering into any contract - UK GDPR Article 6(1)(b)
- It is necessary for compliance with our [legal obligations](#), such as housing legislation, gas safety legislation etc. - UK GDPR Article 6(1)(c)
- You have given us your [consent](#) to allow us to use photographs, audio, video footage about you in social media or our website for example - UK GDPR Article 6(1)(a). Please note, you have the right to withdraw your consent at any time - UK GDPR Article 7(3)
- It is necessary to process your personal information, where we have a [legitimate interest](#) (or where a third party has a legitimate interest) for doing so, and where we are not harming any of your rights and freedoms, including your privacy rights. [Our legitimate interests](#) may include commercial interests, individual interests or broader societal benefits - UK GDPR Article 6(1)(f)
- It is necessary in order to protect your [vital interests](#) or those of another person - UK GDPR Article 6(1)(d)

The **purpose** for Cadwyn using your personal information may include any of the following:

- To make contact with you regarding the suitability of a property before entering into a contract
- To fulfil your agreement with us
- To inform you about changes to our terms and conditions
- To inform you about rent increases, payments and/or arrears
- Dealing with housing applications
- Dealing with any antisocial behaviour
- Dealing with any complaints and appeals
- To survey the opinions of tenants about an existing service(s)

The Legal Basis for Sharing and Storing Your Personal Information

Your personal data will be shared only when it is necessary for the performance of your employment contract or to comply with our legal obligations, including sharing where it is necessary and proportionate to do so with [law enforcement authorities](#) for [law enforcement purposes](#) or where

you have given us explicit consent to do so. We will not sell your personal data.

Our core Microsoft 365, and Azure data is stored in locations in the UK. - UK GDPR Article 46.

How Long We Keep Your Personal Information

We will retain your personal information for no longer than 6 years after your tenancy with Cadwyn ends, unless we have a valid business reason to keep it longer. We will then dispose of your personal data securely. We may also retain some of your personal data for longer than 6 years depending upon the nature of the records. Images from our CCTV cameras can be held for up to 40 days, it may also be longer to assist the [law enforcement authorities](#).
GDPR - Article 5(1)(e)

Your Information Rights

You have:

- the right to be informed about the use of your personal information - UK GDPR Articles 13 & 14
- the right to [access your personal information](#) - UK GDPR Article 15
- the right to amend your personal information (where it is incorrect) - UK GDPR Article 16
- the right to withdraw your consent (if given) at any time - UK GDPR Article 7(3)
- the right to complain (see **How You Can Complain** below) - UK GDPR Article 77

In certain circumstances you may have:

- the right to be forgotten (also known as the right to erasure) - UK GDPR Article 17
- the right to restrict us processing your personal information - UK GDPR Article 18
- the right to data portability - UK GDPR Article 20
- the right to object to us using your personal information - UK GDPR Article 21

- the right to object to automated decision making and profiling - UK GDPR Article 22

If you wish to exercise your information rights, please contact Cadwyn Housing Association, 197 Newport Road, Cardiff CF24 1AJ, telephone 029 2049 8898, or email info@cadwyn.co.uk. Please note that the UK GDPR and the DPA provides some [exemptions](#) to your information rights - UK GDPR Article 23.

How You Can Complain

If you are unhappy with the way that we have used your personal information, you have the right to complain. In the first instance, please email our Data Privacy Officer (dataprotection@cadwyn.co.uk). If you are unhappy with our final response, you may refer your complaint onto the ICO at Wycliffe House, Water Lane, Wilmslow SK9 5AF. Telephone number: 0303 123 1113. <https://ico.org.uk/>

Privacy Notice for Tenants, Residents and Guarantors - Let Right

let-right.co.uk

We may also collect, store and use the following special categories of more sensitive personal information: Information about medical or health conditions, including whether or not you have a disability for which The Agent needs to make adaptations; ...