



Privacy Policy

May 2018

1. Personal Data

Hall Bros are the 'controllers' of the information ('personal data') that we collect about you, who are our 'data subjects'. This means we are responsible for how your data is processed. The word 'process' covers what can be done with personal data, including collection, storage, use, sharing and deletion. This privacy policy explains why and how we process your personal data, and explains the rights you have, including amongst others, the right to access your data, and to object to the way it is processed.

The main reason we use your contact details, financial information and other personal information to provide you with our services, which sometimes involves sharing data with others.

We handle your data carefully and have appropriate controls in place to protect it from breaches. We also work to ensure that data is accurate and only kept as long as is necessary, and that we uphold your rights around how we handle your data.

'Personal data' is any information that relates to a living, identifiable person. This will usually include your name, address, contact details, and other information we collect as part of our relationship with you.

(It can also include 'special categories' of data, which is the official term for information about a person's race or ethnic origin, religious, political or other beliefs, physical or mental health, trade union membership, genetic or biometric data, sex life or sexual orientation. The use of this type of data, and of information about criminal convictions and offences, is subject to strict legal controls).

We only process data if we need to for a specific purpose, as explained below. Most often, we collect your personal data directly from you, through our contact with you.

Your personal data is held in both hard copy and electronic formats. Electronic data, including emails, is stored on the Hall Bros server which is located in Coventry.

2. Your Rights

As a data subject, you have the following rights in relation to your personal data:

- To be informed about how your data is handled;
- To gain access to your personal data;
- To have errors or inaccuracies in your data changed;
- To have your personal data erased, in limited circumstances;
- To object to the processing of your personal data for marketing purposes or when the processing is based on the public interest or other legitimate interests;
- To restrict the processing of your personal data, in limited circumstances;
- To obtain a copy of some of your data in a commonly used electronic form, in limited circumstances;
- Rights around how you are affected by any profiling or automated decisions.

If you wish to exercise any of these rights, please contact us in writing or on the telephone.

Hall Bros processes your data so we can manage and support our relationship with you, comply with legal obligations, improve our services and achieve our legitimate business aims.

3. The Legal Basis for Processing

The information below gives more details about the ways we process your data, including with whom we share data, and the legal basis for each type of processing.

The information we collect	The purposes for which we use the information (the legal basis for processing)
<p>Applications When you apply to live in a Hall Bros home, we collect information directly from you and from relevant third parties, in order to assess your eligibility and suitability for the application you have made.</p>	<p>This processing is necessary for entering into a tenancy agreement with us. We need to know that you are eligible, and that you can afford a property, and can sustain your tenancy.</p>
<p>Tenants When you are a Hall Bros tenant, we will collect information from our interactions with you, including any complaints or allegations that are made by you, or about you, and we process this information to allow us to manage our relationship with you, collect your rent, and provide you with tenancy related services, and appropriate support services, and to manage any complaints or alleged anti-social behaviour or similar issues. This may involve sharing information with, and receiving information from, third parties.</p> <p>Where crimes have been committed or alleged information is shared with the police and other agencies with investigative and prosecution powers.</p> <p>We will share rent information with local authorities for the purposes of administration of benefits.</p> <p>Where local authorities require information for council tax, we will confirm tenancy information to allow the correct tax to be paid.</p> <p>We will share information with utility companies to notify them of your meter readings.</p> <p>We also may share information with debt collection agencies, so they can collect debts on our behalf.</p>	<p>Most of the information we collect and use as part of our ongoing interactions with you is necessary for the performance of your tenancy agreement and is linked to ensuring both you and Hall Bros are complying with the requirements of the agreement.</p> <p>We have a legal obligation to keep business and financial transaction records as appropriate.</p> <p>When we share information for the reasons explained, we will do so because it is necessary for the public interest (crime, benefits and tax payment) or for our legitimate business interests.</p>

<p>Contacts</p> <p>For members of the public who are not tenants but come into contact with Hall Bros in another way, such as to make an enquiry, complaint or allegation, we will collect information from our interactions with you, so that we can provide you with the information you have requested, or so we can investigate and handle any complaints or allegations.</p>	<p>We process this information on the basis that it is necessary for our legitimate interests of responding to your enquiry, complaint or allegation, as appropriate.</p>
<p>Recruitment</p> <p>If you apply for a job with Hall Bros, we collect information about your suitability via other organisations.</p>	<p>This processing is on the basis that it is necessary for an employment contract, or entering into an employment contract, with Hall Bros.</p>
<p>Employees</p> <p>We collect and process information about current and former employees as part of managing your relationship with Hall Bros.</p>	<p>This processing is on the basis that it is necessary for managing your employment contract with Hall Bros.</p>
<p>CCTV</p> <p>Hall Bros uses CCTV in some of our housing schemes for the safety and security of premises, tenants, and any third parties. CCTV footage can be disclosed to those organisations acting on official authority, including the police.</p>	<p>We process data from CCTV for the purposes of our legitimate interest of protecting our premises and people.</p>
<p>Contractors</p> <p>We sometimes work with external contractors who provide our tenants with housing related services, for example boiler maintenance, and we will share your contact details with these contractors, so they can contact you to arrange appointments to provide the services.</p>	<p>We share information in the ways explained based on our legitimate interests of outsourcing the provision of some services and of providing appropriate computer systems, to enable us to run the business efficiently.</p>
<p>Work contacts</p> <p>People we work with – organisations and companies – your contact details are personal data and we will treat it accordingly, using it only as part of our relationship with your organisation.</p>	<p>This processing is based on our legitimate interests of managing business relationships appropriately.</p>