



Privacy Policy

This is the privacy policy of Hexagon Housing Association. It explains what we do with your personal data at Hexagon. It also covers other uses of data and your rights as a data subject. If you have any queries, please make use of the contact details at the end.

What information do we collect and why?

We collect information about you when you make an application with us or a referral is made by you for one of our services. We also collect information when you voluntarily complete customer surveys, provide feedback or where there is general correspondence. Further information may be collected during the course of the tenancy.

The table below sets out what personal data we process, our purpose for doing so, our lawful justification and how long we keep it for: The table below lists the type of information we collect, the purpose of collecting and the legal basis for doing so:

What personal data we process	Our purpose for doing so	Our lawful justification
Contact details, details about your home, household and your housing needs and tenancy agreement.	Allocating homes, managing our services, providing repairs.	Performance of a contract
Rent and service charge information, including details of any arrears.	Allocating homes, managing our services, making financial arrangements related to your home (setting up council tax payments), informing relevant local authority departments.	Performance of a contract
Financial information, including any credit checks, income details, bank details, housing benefit information & any guarantor details.	To make financial arrangements related to your home, such as to enable automatic rent payment through direct debit or housing benefit payments, set up your	Performance of a contract, Legal Obligation

	<p>council tax payments or deal with any mortgage arrangements;</p> <p>To set up arrangements relating to your home, such as informing the Local Authority departments of your tenancy arrangements for council tax and housing benefit purposes</p> <p>To help other people or companies to provide services or utilities to your home or to contact you. This may include where they need to contact you when you first move in to set up payments or about any unpaid bills while you live at your home and/or after you leave your home;</p>	
References received about you (e.g. from your employer or previous landlord).	Allocating homes, managing our services, administration	Performance of a contract
Medical information & emergency contact details, next of kin & any advocate, Information about any accidents or incidents which involve you or your home.	<p>To provide information to our staff to enable them to provide services to you to meet your needs and to train and protect them where necessary;</p> <p>To deal with any medical or other emergencies and to carry out your wishes or Requirement's such as any religious or cultural wishes;</p> <p>To act in someone's best interests such as where we have concerns about a person's health or welfare and may need to involve agencies such as Social Services or the police;</p>	Explicit Consent, Social Protection Law or Protecting Vitals Interests in extreme circumstances
Details about your home when you apply to shared ownership	Allocating shared ownership homes.	Performance of a contract

Right to buy/acquire information	Records necessary for Right to Buy /acquire properties	Legal obligation, legitimate interest
Welfare benefit referrals, Housing benefit notifications, rent Statements, RentSense information	Administration of the contract	Performance of a contract, legal obligation
Information about any complaints made by you or which relate to you.		Legitimate Interest, Legal Obligation.
Information regarding your marketing preferences.	To deliver marketing materials such as our newsletter or make note of particular preferences.	Consent
Any photographs taken of you or your property.	Monitoring defects, assessing any health & safety risks, administering tenancies and security.	Legitimate Interest of Organisation
Any marketing materials/photos taken at events.	To promote our services.	Your Consent
Ethnicity data, Sexual Orientation and Religious Beliefs	To ensure fair and equal access for all to our services; To help us put together statistics to give to our regulator or other government organisations;	Explicit Consent for Equal Opportunities Monitoring
Convictions, proceedings and criminal acts	To respond to legal claims, to deliver our services, safeguarding, The apprehension or prosecution of offenders	Performance of a contract, social protection law, legal obligation, employment law, prevention and detection of crime
CCTV footage	For the prevention and detection of crime	Legitimate Interest
Call Recordings	To improve our services	Legitimate Interest

If we become aware of a risk to our staff, contractors or other residents, or there is an issue that may affect the delivery of services, we may place a note detailing this risk on your records. When we do so, we will inform you and ensure that these flags are regularly reviewed.

We may keep some of your information longer than the periods listed above. This will be to satisfy our legal obligations and maintain certain records where appropriate.

How will we collect this information?

Information will be collected from you personally when you enter into an agreement / contract with us. This will be in the form of applications and any other forms which may be completed in order to apply for one of our properties.

It is possible that we will receive referrals containing your information from public bodies such as local councils, but this should be done with your consent and knowledge of why they are making the referral to our services.

We may generate further personal data regarding our tenants during the course of the tenancy. This could be in the form of general correspondence, or this may need to be generated to satisfy our statutory obligations. An example of Hexagon fulfilling its statutory obligations and potentially collecting personal data would be where photographs of properties are required for the purposes of monitoring defects or for assessing any health & safety risks.

Our legitimate interests

Certain information is processed as it is deemed to be in Hexagon's business or commercial interests. When we rely on any legitimate interest, we will ensure that we take a balanced approach and have appropriate safeguards in line with your expectations. If we rely on any legitimate interest, we will tell you what that is.

Our legitimate interests include:

- Having appropriate security, for our offices and on our sites. This includes CCTV and identification photographs.
- Handling and investigating complaints.
- Keeping our records up to date.
- Collecting unpaid debt.
- Recording threatening behaviour.
- Appending data from other sources.
- Official Communications.
- Keeping our records up to date, working out which of our products and services may interest you and telling you about them.
- Seeking your consent when we need it to contact you.
- Sharing your information with local utilities providers in the event of unpaid debts.

Who will we share it with?

Where information is used for the reasons listed above, we may need to share the information about you and the people you live with other organisations. Details in the table below:

Who we share your information with	The purpose for sharing it	Our justification for sharing
Companies which provide services or utilities to your home (such as the gas, electric or water board) and the relevant Council Tax Department.	Payment of these services	Legitimate Interest, Legal Obligation.
People who provide services on our behalf, such as a managing agent, contractors carrying out repairs.	Fulfilling the tenancy agreement	Performance of a contract/
A credit checking agency, your bank and mortgage company or other financial institutions and (where necessary) a debt collection and/or tracing agency.	Allocating and administering properties and tenancy agreements.	Performance of a contract. Where debt collection is involved, this will be in our legitimate interest.
The Housing Benefit department and other Government departments which provide funding for your housing or care/support services. In particular, we may be legally required to give information about any changes in your financial circumstances to the Housing Benefit department.	Legal requirement.	Legal obligation.
Resident representatives and board members involved in our complaints process.	To improve our services	Legitimate Interest
A doctor, hospital, paramedic or health worker	Where you require medical attention and are unable to provide the information yourself.	Your consent, in line with Social Protection Laws, Amendment 85
Our legal advisors, the courts and the police. This may include information about antisocial behaviour, which we may also share via a joint website accessed by landlords, the police, Social	Reducing ASB and fraud, the prevention and detection of crime.	Handling legal claims

Services and other bodies with the aim of reducing anti-social behaviour.		
People or agencies who provide services to you or who work with us to provide services to you, such as your care/support provider.	To deliver services	Performance of a contract
The bodies involved with your care/support such as the relevant Local Authority departments, or Social Services and any alarm call centre.	To deliver services	Performance of a contract
Our regulator or other bodies which look at how we provide services as your landlord & other people where we are legally required to provide information to them.	Legal required	Legal obligation
Your next of kin or other people acting on your behalf in an emergency and a member of your church or religious leader, where you have requested this.	Requested	Consent
To another landlord or housing association where you are looking to move or exchange your property (e.g. where they request your details &/or a reference from us).	Requested	Legitimate interest?
Relevant Local Authority departments (including housing benefit, council tax, elections, adult services, fraud teams etc.)	Legal requirement	Legal obligation.
To relevant people and authorities such as the police, adult and child protection and social services. This may include sharing information when we have concerns about a person's health or welfare or where there are investigations being carried out, such as sharing information in a case conference with such bodies and other parties involved (such as teachers, nurses, etc.) or where we have concerns about possible criminal activity.	Social Protection, Prevention and Detection of Crime.	Social Protection, Prevention and Detection of Crime.

Companies who process information on our behalf such as an external mailing company (who send out our newsletter), our archiving company, our confidential waste disposal company. providers of our information technology services or software.	To enhance our services.	Legitimate Interest
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How long will we kept it?

We retain your data for as long is necessary to meet our legal, contractual obligations and our legitimate interests. We have a retention schedule for all the personal data we hold that reflects this. You may request a copy from us.

International Transfers

Hexagon will not transfer your information outside of the European Economic Area without adequate safeguards. Hexagon does not transfer any personal data internationally, besides information transferred to SurveyMonkey and Mailchimp, which are both covered by the Privacy Shield.

If Hexagon were to transfer any personal data internationally, this will be in line with our internal procedure and the terms in this privacy notice will be updated.

Profiling

Hexagon make use of RentSense by Mobyssoft in order to help facilitate rent payments. To quote the RentSense website

“RentSense is a series of complex algorithms that analyse a housing organisation’s tenants’ transactional history, which is coupled with a predictive analytical application that then predicts which tenants will and won’t pay their rent. It then produces a list of tenants, in priority order, that need contacting that week regarding their rent.”

Marketing

We maintain a newsletter which we periodically send to tenants, containing useful news and information regarding social housing and related services. Those who have signed up to our services receive the newsletter as standard. If you would like to stop receiving the newsletter you may opt out at any time you wish by contacting us at the below details.

We also ask for people’s consent to direct marketing using our standard consent forms. Further direct marketing may be conducted by post or by telephone (provided you are not on the TPS) under our legitimate interests.

If you would like to stop receiving any marketing material, or you would like to edit your preferences, please contact us. Unsubscribe options will also be offered on all emails.

Please note, opting out of marketing does not remove the ability for Hexagon to contact you regarding general correspondence or delivering the tenancy.

Keeping your information secure

We store personal information both electronically and in paper form.

We implement security policies, processes and technical security solutions to protect the personal information we hold from:

- Unauthorised access
- Improper use or disclosure
- Unauthorised modification
- Unlawful destruction or accidental loss

When you contact us, we may ask you to provide us with some information so that we can confirm your identity. If other people (e.g. family members, support workers, solicitors) act on your behalf we will take steps to ensure that you have agreed for them to do so. This may include asking them to provide us with supporting information to indicate your consent. We do this to protect you and to make sure that other people cannot find things out about you that they are not entitled to know.

Employees and third parties who have access to, or who are associated with the processing of your personal information, are obliged to make reasonable efforts to safeguard it.

Cookies

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity. For further information visit www.aboutcookies.org or www.allaboutcookies.org.

Changes

We will notify you of any changes to this privacy policy.

Your rights

Under the GDPR, you have rights regarding your personal data. These are included in the table below.

Right available	Description of right	The right in practice
Right of access	You have the right to obtain confirmation from Hexagon as to whether or not personal data concerning you are being processed, and, where that is the case, access to that personal data.	Hexagon will provide a copy of all personal data belonging to you, or specific personal data if you so require it. This will not include the personal data of any other individuals, or information regarding Hexagon's operations. We will redact where possible where exemptions apply. These may include a duty of confidentiality being in place.
Right to rectification	You have the right to oblige Hexagon to rectify inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed by providing a supplementary statement.	This will only apply to inaccurate personal data; information contained on your application form or any flags placed on your record. This will not lead to any personal data which you disagree with being rectified, merely personal data which is inaccurate.
Right to erasure (right to be forgotten)	You have the right (under certain circumstances, but not all) to oblige Hexagon to erase personal data concerning you. This will never include current tenancy details as necessary to fulfil our contractual obligations, or any information we are required to process under law.	The right to be forgotten only applies: <ul style="list-style-type: none"> • Where the personal data is no longer necessary • If you withdraw consent • If we unlawfully held your personal data • If you successfully object to our processing • If we have to follow a legal obligation to delete.
Right to restriction of processing	You have the right (under certain circumstances, but not all) to oblige Hexagon to restrict processing of your personal data. For example, you may	This right only applies: <ul style="list-style-type: none"> • Where you contend the accuracy of any personal data until

	request this if you are contesting the accuracy of personal data held about you.	<p>it has been made accurate</p> <ul style="list-style-type: none"> • Where you have objected to any processing whilst we present our evidence • If we are processing anything unlawfully and you do not wish for it to be erased • If we no longer need the personal data but you require the data to establish, exercise or defend a legal claim.
Right to data portability	<p>You have the right (under certain circumstances, but not all) to oblige Hexagon to provide you with the personal data about you which you have provided to in a structured, commonly used and machine-readable format.</p> <p>You also have the right to oblige Hexagon to transmit those data to another controller.</p>	<p>This right only applies to data collected by automated means. As Hexagon does not currently undertake processing which is automated, we do not see any circumstances in which we would have to comply with this right. For a copy of your personal data, please carry out a subject access request instead.</p>
Right to withdraw consent	<p>If the lawful basis for processing is consent, you have the right to withdraw that consent. If you wish to withdraw your consent, contact us immediately.</p>	<p>Processing based on consent is likely to be limited to photographs at events, marketing information and in certain cases ethnicity or sexual orientation information.</p> <p>Withdrawing consent will not affect the legality of any processing carried where consent were given i.e. leaflets distributed will not be recalled.</p>

Right to object to direct marketing	Where your personal data are processed for direct marketing purposes, you have the right to object at any time to processing of your personal data for marketing, which includes profiling to the extent that it is related to such direct marketing.	This right will apply instantaneously in most instances. If you would still like to receive marketing in one particular medium, please let us know. Hexagon still reserves the right to contact you regarding important matters unrelated to marketing i.e. chasing rent arrears.
Rights in relation to automated decision making and profiling	Hexagon does not perform any automated decision-making based on personal data that produces legal effects or similarly significantly affects you.	Unlikely to occur in practice; Hexagon does not carry out any automated decision making based on profiling. Where profiling is carried out without automated decision making, we will inform you where it crosses a certain threshold.

Hexagon is not a scheduled body under the Freedom of Information Act and therefore does not have to respond to any requests under the Act.

For more information about any of your rights, please visit:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

Contact information

Please contact us if you have any questions in relation with this notice or the information we hold about you:

by email: **dataprotection@hexagon.org.uk**

by phone: **020 8778 6699**

by post: **Hexagon Housing Association, 130-136 Sydenham Road, London SE26 5JY**

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