

Hexagon

**Privacy Notice for
our Customers**

Who we are

Hexagon is the data controller whose head office is located at **130-136 Sydenham Road, Sydenham, London, SE26 5JY.**

If you would like to find out more about how we use your personal information, you can contact us at dataprotection@hexagon.org.uk

How we collect your information

We collect most of our information directly from you, including when you apply for one of our properties or services, complete one of our forms, when you write, email or meet with us, or respond to a survey. We may also process information that you post on social media about Hexagon if it relates to a situation that we need to be aware of and/or take action on.

We also collect information from other third parties, but only where it is relevant to our relationship with you.

- Organisations that we contract with to provide services on our behalf (our data processors), for example, maintenance and repairs, customer surveys etc
- Local councils and central government departments such as the Department of Work and Pensions – for information about your benefits
- Local authorities, health and social care professionals, previous care providers – for information about your health, care and support needs, and those of your household (including your children)
- Previous landlords for your rental history
- Credit reference agencies – for credit checks and information about your financial status/history when you apply for any Hexagon property, for debt recovery purposes, and fraud investigations/data matching checks. For commercial tenants, we may carry out ongoing risk assessments on commercial viability using credit reference data
- Home Office, local authorities – for information about your immigration status
- Police and other public authority fraud departments, local authorities – for information on criminal activity
- Other residents – if we receive information in relation to complaints about behaviour
- Energy providers – where your heat/energy bills are included in your rent/service charge, we receive information about your energy usage
- Managing agents – where they manage properties on our behalf

How we use your personal information and the legal basis for processing

To assess your property application and manage our contract with you

We use the information we hold about you to manage your tenancy or leasehold. We need this to deliver our services to you. We collect most of this information because it is necessary in the performance of a contract. You will not be able to opt-out of providing this type of information.

We also process some of your data because it is in our legitimate interests to do so. You can object to this processing if you think that your legitimate interests outweigh ours.

We consider that we have a legitimate interest to make sure that:

- Our services/properties meet the needs of our customers
- We can contact residents in the event of emergencies and to carry out essential repairs
- We communicate with residents to meet our business objectives
- We work with authorities and the police to support safer communities
- Hexagon remains commercially viable and protects its commercial and social assets
- We have effective procedures for preventing, and managing, outstanding debt for example from unpaid rents, service charges etc
- We make the most efficient use of our resources and we understand how we are performing
- We understand our residents' experiences and views so that we can effectively influence and contribute to future housing strategies

To provide support services

As a provider of support services, we process data about your health and social care to deliver our services and to safely meet your assessed needs. We also process this information because it is necessary for the performance of a contract, to fulfil our legal regulatory obligations and because it is in our legitimate interests to do so.

Where we are providing support services as part of a local authority contract, we may share your information with the commissioning local authority or other partner organisations that we are working with to deliver the service.

To provide appropriate properties and services

We process personal information that relates to your health and social care, to help us make any reasonable changes to our properties and services, to make them fit for purpose and accessible for everyone. We also use this type of information to make sure we are protecting vulnerable individuals in our homes.

We do this to meet our legal and regulatory obligations, for example, the Equality Act 2010, and because there is a substantial public interest for us to do so.

To promote community safety and a peaceful community environment, and to safeguard individuals

We process personal data to promote a peaceful and safe community environment; this can include information about anti-social behaviour, criminal activity/convictions. We process this information to prevent/detect unlawful acts, because it is necessary for the performance of a task carried out in the public interest, and/or for reasons of substantial public interest.

We process information about safeguarding individuals, to fulfil our legal obligations and because there is a substantial public interest for us to do so.

To contact you about your property and other services

We use your contact details (including telephone numbers and email addresses) to get in touch with you about issues relating to your tenancy or leasehold and to deal with any legal matters arising from it. This includes repairs and maintenance, rent collection, complaints and housing management issues, in the event of an emergency, or to enforce the terms of your tenancy or lease.

We may pass on your details to contractors that provide services on our behalf, so that they can contact you to carry out essential services related to your property. We do this because it is necessary for the performance of a contract. It is not possible to opt-out of this type of data processing. Where we do not have the appropriate contact details for you, we may also try and source these externally from other third parties or public sources of information.

We're constantly working to improve our services. One of the ways we do this is by listening to our residents and asking for feedback via surveys. These surveys are carried out by contractors who are specialists in customer feedback. In such cases, we pass on your contact details to them so you that they can contact you and ask about our performance. It is in our legitimate interests to use your contact details this way, however, you may opt-out of further contact by letting the person requesting feedback know that you do not wish to take part in future.

We also use your contact details to keep you updated about Hexagon events or other services which do not form part of our contractual landlord service, but which may be of interest to you. This includes our e-newsletter and letting you know about things such as accessing training opportunities, energy efficiency, digital support, housing options events and financial advice. It is in our legitimate interests to use your contact details this way, however, you may opt-out of further contact by simply selecting the opt-out button in the email or text.

To monitor equality, diversity and inclusion

We may ask you to provide us with your diversity data (ethnicity, religion, disability, sexual orientation). This information is not used to inform any decisions we make about you individually but is gathered for statistical purposes to help us understand who is living in our homes. It helps us to ensure we take account of any cultural or religious needs, fairness and equality in the services we provide and allows us to fulfil

our legal and regulatory obligations. You do not have to provide this information but it helps us if you choose to do so.

Children

We do not usually gather information directly from children as part of our core landlord service. We may process information relating to children in our households where it has been provided to us during our relationship with you. In such cases, we process that information based on our legitimate interests and to fulfil our legal and regulatory obligations.

To prevent and detect fraud and illegal subletting

We process some personal data to guard against fraud and illegal subletting, for example, proof of identity, data matching. Failure to provide any information we require in relation to this could put your application or tenancy at risk.

We process this type of information to fulfil our legal obligations and to prevent and detect unlawful acts. In most instances, you are unable to object to this type of processing.

For profiling purposes

We use some of your personal data to create a profile of you so that we can identify relevant Hexagon services that might be of interest or helpful to you. For example, if information suggests that you might be having some difficulties with managing your finances, or we think you might encounter difficulties in the future, we can direct you to our Welfare Benefits and Money Advice Team. Alternatively, if our information suggests that you might have additional needs because of age, or ill health, we may offer you an enhanced service.

We do not use automated profiling or automated decision making to make any decisions on your application, tenancy or leasehold.

To support research and analysis

We may use your personal data to carry out internal research and analysis. We do this to develop and improve our services and to help us understand trends within the housing sector. We process information based on our legitimate interests for these purposes.

Sharing your personal information

Data processors

We also share some information with our data processors, which are organisations that carry out a service on our behalf. This includes repairs and maintenance, managing agents, gas servicing, credit reference agencies, heat meter providers etc. We only share the information which is necessary for them to carry out the service they have been contracted to provide. All our contractors operate under the terms and

conditions of a legally enforceable contract and will not use your information for anything other than carrying out a service on behalf of Hexagon.

In most instances, we do this because it is necessary for the performance of a contract, i.e. your tenancy or leasehold agreement. Where that does not apply we process this information based on our legitimate interests.

Managing Agents/Freeholders

Where managing agents are acting on our behalf we may share any information with them that is necessary for the effective management of the buildings, including any health and safety issues. Where other Landlords (or managing agents acting on their behalf) are involved in the joint management of properties, we may also share the same information.

We do this because it is necessary for the performance of a contract or in order to fulfil our legal obligations. Where this does not apply, we do this on the basis of our legitimate interests.

Lettings data

We share information about social housing lettings data with central government. It is a regulatory requirement for all registered providers to supply this data as per the Tenancy Standard. The Tenancy Standard is a non-statutory Code of Guidance which we are obliged to follow.

The data sets we share include information on lettings, type of tenancy, rents and charges, demographic information about tenants (including special category data and criminal convictions) and financial information. The data set does not include names or addresses but does include the unique property reference and the full postcode.

This information is used for research and statistical purposes to allow the government to exercise their role in providing adequate social housing. The information cannot be used for any other purposes, such as making decisions in relation to specific individuals.

We share this information because it is necessary for the performance of a task carried out in the public interest and/or for reasons of substantial public interest. Individuals are not able to opt-out of this processing.

Others

Other organisations we may share your information with include:

- Local councils and government departments (including the Ministry of Housing and Levelling up)
- Health and care services
- Police and other law enforcement agencies
- Electricity, water and gas companies
- Social Housing Regulator
- MPs and Councillors acting on your behalf
- Housing Ombudsman Service

Recording telephone calls

We may record your telephone calls to our Customer Contact Centre and customer facing teams, for training and monitoring purposes and to make sure we're delivering a good service. We process data in this way because it is in our legitimate interests to do so.

Commercial tenants

Hexagon collects very limited personal data about its commercial tenants, as most of the information we collect is about your business. However, some personal data is collected about individual sole traders and individual shareholders and/or Directors of companies.

We collect most of our information directly from you when you apply, either directly to us or through our managing agent, to rent/lease a property for commercial business. We may also collect information about you, your shareholders and/or Directors from public sources using credit reference agencies. Information collected from credit references may also be used to carry out ongoing risk assessments on the commercial viability of commercial premises.

We use the information we hold about you, your shareholders and/or Directors to manage your tenancy or leasehold. We need this to deliver our services to you. We collect most of this information because it is necessary in the performance of a contract. You will not be able to opt-out of providing this type of information.

We also process some of your data because it is in our legitimate interests to do so. You can object to this processing if you think that your legitimate interests outweigh ours.

IP addresses

If you visit our website we collect your Internet Protocol address. Hexagon logs this information for internal review purposes. For example, this log information helps us determine how well our services are working so Hexagon can continually improve the quality of its web sites. The log information is also important for security, audit and quality improvement.

How long we keep your personal information

How long we keep your personal data for can depend on the type of data it is. We have set retention periods for different categories of data. We keep information on our tenancy files for up to six years after the tenancy ends. We hold CCTV footage for 31 days. We hold recordings of telephone conversations to our customer facing teams for no longer than 6 months.

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