



PRIVACY NOTICE

Last updated December 2020

Your privacy is important to us and we appreciate your trust when you share your data with us. This Privacy Notice (Notice) explains who we are, what data we collect, how we protect it and how you can exercise your rights in accordance with UK data protection legislation.

This Notice is subject to change so check back regularly to get updated privacy information.

Who we are

Be West is a brand that is owned by Shepherds Bush Housing Group (SBHG). SBHG is a parent company for a number of organisations and brands so where we refer to 'we' or 'us' in this Notice, we are referring to all companies within the Group, including Be West.

Our registered address is:	Our ICO registration number is:	Our Data Protection Officer is:
Mulliner House Flanders Road London W4 1NN	Z9615842	Catherine Hardysmith data.protection@sbhg.co.uk

Source of personal data

We obtain personal data by various means through:

- Face to face interactions,
- Email,
- Telephone,
- Letter correspondence,
- Correspondence with others e.g. a local elected member who is representing you, police, health or social care agencies, benefit agencies, people who know you and/or are linked to you (for example: relative, person nominated to act on your behalf or your legal representative, joint account holders). Former housing and support providers, health and social care agencies, law enforcement agencies, social workers, doctors, debt collectors, energy or utility companies, benefit agencies, financial advisors and or credit reference and fraud prevention agencies.
- Telephone recording equipment
- CCTV cameras
- Our websites
- Our social media account



Purposes of processing

Most of the information we collect will be for one or more of the following purposes:

- You're a tenant in one of our properties, and we need to provide housing services to you
- We manage a property you own
- You're buying or selling a property from/to us
- You've made a complaint to us
- You've made a query
- We need to complete repairs and/or maintenance work
- To process payments (e.g. rent, fees, benefits etc)
- Equal Opportunities monitoring
- Research
- To comply with our statutory/regulatory obligations (e.g. Regulator of Social Housing, Health and Safety Regulations)
- To improve our services
- To manage our websites
- To facilitate communication with you
- For the security of you and our staff

Legal basis of processing

In order to process your information, we need to make sure we have a legal reason (or legal basis) to do so. The legal bases available to us are:

1. Consent (when you freely give an affirmative indication that you want us to process your data)
2. Legal Obligation (when we need to comply with the law)
3. Contractual Obligation (when we need to fulfil a contract)
4. Vital Interests (when we need to protect the life, safety and wellbeing of our data subjects)
5. Public Interests (if we need to exercise official authority given to us)
6. Legitimate Interests (when we need to process data for a genuine reason that isn't covered by the above bases)

What data we collect

We gather a variety of personal data depending on the services we provide to you. The following table explains what specific types of information we gather and how it may be shared:



Type of data subject	Data element	Purpose(s) of processing	Legal basis of processing	Any third-party recipients of the data
Resident and any occupant of a property	Contact details – name, address, email, home and mobile telephone numbers. Age – date of birth, Identification – information to allow us to check your identity Credit history information, Online computer identification (IP address) – information recorded when you engage with us by email or through our website, National Insurance numbers – information to carry out functions such as universal credit and/or supporting people, Next of kin- when you provide information about other data subjects you are confirming you have their consent to provide that information to use and that it is accurate	Provision of housing services	Contractual Obligation Legal Obligation	Police, any other local housing authority, Regulator of Social Housing, other Regulators, Contractors carrying out work on our behalf
Vulnerable residents and residents that require specialist properties	Health data (including medical, mental health or disability data)	Support our housing functions where specialist properties are required, Providing certain	Legal obligation Vital interest	



		support or care services to vulnerable customers		
Residents and staff	Race, ethnic origin and religion data	Equality monitoring	Legal obligation, For staff- Explicit consent, Necessary for the purposes of employment, social security and social protection law	
Staff	Sexual life or sexual orientation data	Equality monitoring	Legal obligation, Explicit consent, Necessary for the purposes of employment, social security and social protection law	
Residents and staff	Criminal conviction data	Prevention and detection of crime, rehabilitation of offenders	Contractual Obligation, Staff- Explicit consent, Legitimate Interests	
Staff	Photographs	Identification purposes	Contractual Obligation, Explicit consent, Vital interest, Legitimate Interests	
Anyone that calls us	Call recordings	Training, quality and complaints monitoring and staff safety	Legitimate Interests	



Residents and staff	Video images captured through CCTV (CCTV policy available upon request)	Prevention and detection of crime, damage or vandalism to our properties, Ensure the safety and security of our staff and individuals obtaining services from us	Legitimate Interests	Police
Residents and staff	Images captured by film photography, digital photography, video or other medium	Use on websites, brochures and other publicity material (such as internal and external newsletters and social media)	Consent	Media (for local or national publication)
Residents and occupants of a property that have a direct relationship with us (e.g. applied for housing in their own right or obtain services from us directly):	Name, contact details, date of birth, your current and previous countries of residence/citizenship, and a copy of identification documents (such as passport, home office residence papers and driving license).	To confirm if a person has the right to reside in the UK	Legal Obligation	
Residents	Financial data	To administer payments to and from your accounts	Legal Obligation Contractual Obligation	Other agencies (e.g. benefits agency)



Residents	Financial data	To prevent financial crime including benefit fraud or illegal subletting	Legal Obligation	Police, banks, building societies, credit reference and fraud prevention agencies
Residents	Financial data including information about any debt owed to us	To carry out lettings, provide tenancy support and make a decision in relation to lettings	Contractual Obligation	Debt collection agencies
Residents and occupants of a property	Financial details, details about a person's circumstances	For market research or statistical purposes to help inform social policy and understand the social housing market	Legitimate Interests	Our regulators and government agencies
Resident and any occupant of a property	Any of the personal information listed above	To prevent possible homelessness	Legitimate Interests	Local housing authority
Website visitors	IP address, cookie information, the website from which you accessed our website, other anonymous analytics information	To monitor website traffic and communicate with website users via Live Chat	Legitimate Interests	
Residents and occupants of a property and staff	Health data concerning SARS-COV-2 and COVID-19 (e.g. if you're self-isolating or had/have symptoms)	To ensure the health, safety and wellbeing of our staff, contractors and the wider community	Legal Obligation	Public Health England or another statutory body for



				the purposes of seeking advice
Prospective home buyers	Name, Date of birth, Marital status, Contact number, Email address, Citizenship, Immigration status, Current and previous address, Signature	To process an application to buy a home from us To verify whether the applicants qualify to purchase a home from us To prevent fraud	Contractual Obligation Legal Obligation	Police, if requested Local council (marital status)
Prospective home buyers	Type of tenure, Employment status, Type of contract, Salary information, Savings information,	To assess whether purchasing a home from us is affordable for the applicant(s)	Legal Obligation Legitimate Interests	Police, if requested
Prospective occupant of a purchased home (i.e. someone who is not the applicant to purchase a property but will be living there, such as a dependent or another adult)	Name, Date of Birth, Relationship to the property applicant(s)	To help assess a property's suitability for the applicant(s)	Legitimate Interests	Police, if requested
Prospective home buyers	Disability status	For equality monitoring purposes	Legal Obligations Vital Interests	Local Council



		<p>To ensure our disabled customers have priority for the right properties</p> <p>To ensure the right adjustments are made to a property</p>	Legitimate Interests	Third party contractors (to carry out any required works)
Sales website visitors	Name, Email address, Phone number	To contact someone who expresses interest in one of our developments	Legitimate Interests	



Where we ask for certain personal data on the legal basis of contractual or legal obligations, we won't be able to provide some of our housing, support or products or services without it.

We may also share it with other members of our corporate group, or a purchaser or potential purchaser of our business. If we do this, we will tell you about it beforehand.

In limited circumstances we may use your information for a purpose other than those set out in this policy. If we intend to use it for another purpose, we'll contact you before we do.

Security

We have put appropriate security measures in place to prevent your personal data from being accidentally lost, altered, disclosed, used or accessed in an unauthorised way. 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.

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. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

International transfers

We will endeavour to only process your data within the UK or EEA. Where this is not possible, we will assess whether that the country where the data will be processed has as data protection laws in place that grant similar rights to data subjects as in the EEA. We will also use approved mechanisms of transfer e.g. Standard Contractual Clauses or other appropriate safeguards.

Phishing

'Phishing' is the name given to attempts to steal personal details and financial account details from a website user. 'Phishers' use fake or 'spoof' emails to lead users to imitation websites where the user is tricked into entering their personal details, such as credit card numbers, usernames and passwords. We will never send emails asking you for such details and our staff will never ask you for your password

If you do receive such an email or are asked for your password by anyone claiming to represent us, please forward the email or report the incident to our Data Protection Officer.

Retention

All data is held in accordance with our legal obligations and/or our retention schedule. We will not keep data for longer than is necessary to carry out the purposes of processing.

Your privacy rights

You have the right to exercise your statutory rights relating to your data. These include:

1. The right to be informed
2. The right of access



3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling

Unless otherwise stated, you can exercise your rights by contacting our Data Protection Officer.

The right to be informed

You have the right to be informed about whether we process your data, what data we collect about you, the reasons why, who we share it with and how we protect it. This Notice forms part of our obligation to fulfil your right to be informed.

The right of access

You have the right to have a copy of the personally identifiable data we hold about you. You can exercise this right by filling out the form on the SBHG website [here](#) or contacting our Data Protection Officer at sar.request@sbhg.co.uk

Before we respond to your access request, we will ask for proof of identification. Once we receive your proof of identification (and narrowed your request, if necessary), we will respond to your access request within one calendar month.

Malicious, vexatious or repetitive requests will not be fulfilled but we will assess this on a case-by-case basis.

The right of rectification

You have the right to tell us to change the details we hold about you if they are wrong or need to be updated.

If you are a resident, you change your details by logging into your SBHG Resident Portal. If you are a prospective home buyer, you can log into your account and change your details. If you are not a resident or prospective home buyer, you can rectify your data by emailing data.protection@sbhg.co.uk or using our details on the Contact Us page of the website.

The right of erasure

Commonly known as the 'right to be forgotten', you have the right to have your data erased if:

- It is no longer needed for the purposes for which it was collected,
- The data was processed on the legal basis of consent and you have withdrawn your consent,
- The data was processed on the legal basis of legitimate interests, you object to that processing and there is no overriding legitimate interest,
- If the data was processed unlawfully, or
- We need to comply with a legal obligation



The right to restrict processing

You have the right to have your data restricted in certain circumstances:

- If you contest the accuracy of your data and we are verifying the accuracy,
- If we are processing the data unlawfully but you don't want us to erase the data,
- We no longer need the data, but you want us to keep it in order to establish, exercise or defend a legal claim,
- If the data was processed on the legal basis of public interest or legitimate interest, you object to that processing your data and we are in the process of determining whether there is an overriding interest.

The right to data portability

You have a right to move, copy or transfer data you have provided to us to another IT environment if:

- The data is being processed by automated means; and,
- The legal basis of the processing is either consent or contractual obligation.

The right to object

You have the right to object to all or parts of your data being processed if:

- The purpose of the processing is public interest
- The processing is in exercise of official authority vested in us
- The legal basis of the processing is legitimate interests (or the legitimate interests of a third party)
- The purpose of the processing is for scientific or historical research or statistical purposes

The right to withdraw consent

You have the right to withdraw your consent at any time if the data we process about you is done so on the legal basis of consent.

In the event you wish to withdraw your consent, (e.g. for pictures that were taken of you at an event or for sending you marketing materials) you can do so by letting a staff member know, changing your consent settings in your account, or contacting our Data Protection Officer.

Research and statistical use of your data

If you would like more information about how your data is used for research and statistical purposes by the Government and why, this can be found in the Continuous Recording of Social Housing Lettings and Sales (CORE) notice.



Complaints

As with all our services, if you aren't happy with the way we've used your data, you're entitled to make a complaint. You can do this by:

- Completing [this](#) online form
- Emailing us at data.protection@sbhg.co.uk
- Writing to us at: The Data Protection Officer
Mulliner House
Flanders Road
London
W4 1NN

You can also make a complaint to the Information Commissioner's Office (ICO). You can find out how to contact the ICO on their [website](#), or write to them at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number

Questions, comments and requests regarding this Policy are welcomed and should be addressed to the Data Protection Officer.