



HAIG HOUSING TRUST PRIVACY NOTICE FOR APPLICANTS

1. Background

Haig Housing understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all those who apply to us for housing and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

2. Information About Us

Haig Housing Trust is a Charitable Limited Company, registered in England and Wales No.6593129.

Registered and postal address:

Haig Housing, Mountbarrow House, 12 Elizabeth Street, London, SW1W 9RB

Email address: enquiries@haighousing.org.uk

Telephone number: 020 8685 5777

Haig Housing is regulated by the Charities Commission, Companies House and the Fundraising Regulator

Haig is a member of the National Housing Federation, the Confederation of Service Charities (Cobseo) and the Housing Ombudsman scheme.

Haig is a partner of the Veterans Gateway and upholds the Armed Forces Covenant.

3. What Does This Notice Cover?

This Privacy Information explains how we use your personal data, how it is collated, how it is held and how it is processed. It also explains your rights under the law relating to your personal data.

4. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

In simpler terms, personal data is any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 6 below.

5. What are my rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 12.

- The right to access the personal data we hold about you. Part 11 will tell you how to do this.
- The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- The right to be forgotten, ie the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 12 to find out more.
- The right to restrict (ie prevent) the processing of your personal data.
- The right to object to us using your personal data for a particular purpose or purposes.
- The right to data portability. This means you can ask us for a copy of your personal data held by us to re-use with another service or business in many cases.
- Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 12.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

6. What Personal Data Do You Collect?

Haig Housing may collect some or all of the following personal data. This may vary according to your relationship with us:

- Name, date of birth, gender
- Address, email address, telephone number
- Details of spouse/partner and any dependents who would live with you
- Service details including proof of Service, rank, Service number, years served, reason for leaving
- Details of any Armed Forces pension

- Details of any War Pension, Armed Forces Compensation or Criminal Injuries Compensations (Overseas) scheme payment or pension
- Current employment details
- Where applicable, information about your personal and medical circumstances in those instances where you are applying for Special Needs housing
- Other information that will assist us in assessing your housing needs, preferences, eligibility and priority for housing

Your personal data may be obtained from the following third parties (this list is not exclusive):

- Local authorities
- Personal referees
- Family members
- National Health Service
- Private and specialist medical organisations
- Other charitable organisations
- The British Armed Forces
- The Ministry of Defence
- Your MP

7. How Do You Use My Personal Data

Under the GDPR, Haig must have a lawful or legitimate basis for using personal data. In the first instance, this will be on the basis of your consent in providing this data for this purpose. Your personal data may be used for one or more of the following purposes:

- Assessing you for housing
- Providing any related services to you
- Personalising and tailoring our services for you
- Communicating with you generally by post, telephone and email. Providing you with periodic updates on the status or progress of your application.
- Supplying you with information by email, post or text message (provided you have opted into this latter service). You may unsubscribe or opt out at any time by contacting us to request this.

We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt out.

8. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason/s for which it was first collected. Your personal data will therefore be kept for the following periods:

- In the instance of on-line tenancy applications, for a period of 60 days if not fully completed and submitted

- In the instance of successful tenancy applications, for a period of 6 years after you accept our offer, or until termination of your tenancy
- In the instance of pending tenancy applications or where you have declined an offer but still wish to be considered, until such time as an offer (or further offer) is made and accepted and thereafter as above
- In the instance of unsuccessful applications or where you turn down an offer and do not wish to be further considered, for a period not exceeding 6 months
- Documentation, correspondence and information provided by other agencies relating to special needs of current applicants, and to records relating to offenders, ex-offenders and persons subject to cautions, while the application remains open

9. How and Where Do You Store or Transfer my Personal Data?

The Trust or those who hold data on its behalf may store or transfer some or all of your personal data in countries that are not part of the European Economic Area (the “EEA” consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as “third countries” and may not have data protection laws that are as strong as those in the UK and/or the EEA. We will therefore require that anyone we share your data with who stores or transfers this outside the EEA puts in place written agreement with those it uses for this to guarantee that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR.

10. Do You Share My Personal Data?

We may share your personal data with other companies or third parties who we consult in order to verify information provided in your application or from whom we seek references. These may include the Ministry of Defence, your current Landlord or local Housing Authority.

We are able to provide you with details of such companies or third parties including their name, location and the purposes for which this personal data is shared, on demand.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party’s obligations under the law. To achieve this we will require any such company or third party to enter into a Data Processor Agreement or similar contractual undertaking.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

11. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details and a copy. This is known as a “Subject Access Request” or “SAR”.

All Subject Access Requests should be made in writing and sent to the email or postal addresses shown in Part 1.

There is no charge for a Subject Access Request. However, if your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your SAR by sending you the appropriate form by return. Normally we aim to provide a complete response, including a copy of your personal data, within one month of receiving your SAR. In some cases however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

12. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including making a Subject Access Request, please use the following details and mark for the attention of the Corporate Director:

Email address: allocations@haighousing.org.uk

Telephone number: 020 8685 5777

Postal address: Haig Housing, Mountbarrow House, 12 Elizabeth Street, London SW1W 9RB

13. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available to you in writing by letter (or email where this has been provided by you as a means of communication) and attention drawn to this on our website and through social media.