

Tenant, Resident and Service Recipient Privacy Notice

This notice explains what information we collect, when we collect it and how we use it. During the course of our activities, we will process personal data (which may be held on paper, electronically, or otherwise) about you and we recognise the need to treat it in an appropriate and lawful manner. The purpose of this notice is to make you aware of how we will handle your information and is principally intended for our tenants, residents and service users or recipients.

Who are we?

Radius Housing Association, (the RHA) (registered office at **3-7 Redburn Square, Holywood, BT18 9HZ**) is a registered housing association which is registered with the Department of Communities under the Housing (Northern Ireland) Order 1992 (Registration Number 1), registered as an Industrial and Provident Society (No IP169) and registered with the Charity Commission (No NIC102575).

We take the issue of security and data protection very seriously and strictly adhere to the requirements of UK GDPR, the Data Protection Act 2018 and the Data Use and Access Act 2025.

We are registered as a Data Controller with the Office of the Information Commissioner under registration number **Z5683095** and we are the data controller of any personal data that you provide to us.

Our Data Protection Officer is **Brendan Burdock, HR Project & Data Governance Manager**.

Any questions relating to this notice and our privacy practices should be sent to:

**Radius Housing Association
3-7 Redburn Square, Holywood
BT18 9HZ**

or alternatively,

data.protection@radiushousing.org

How we collect information from you and what information we collect:

We collect information about you when:

- ✓ you apply for housing with us, become a tenant, request services/ repairs, enter in to a factoring agreement with ourselves howsoever arising or otherwise provide us with your personal details ;
- ✓ you apply to become a member;
- ✓ from your use of our online services, whether to report any tenancy/factor related issues, make a complaint or otherwise; For example, Radius Website, Radius Facebook and Twitter accounts;
- ✓ from your arrangements to make payment to us (such as bank details, payment card numbers, employment details, benefit entitlement and any other income and expenditure related information);

Depending on the contract we have with you, we may collect the following information about you:

- ✓ name;
- ✓ address;
- ✓ telephone number;
- ✓ e-mail address;
- ✓ photographs;
- ✓ CCTV visual and audio footage (including dome cameras);
- ✓ Audio and Video footage from Body Worn Video;
- ✓ National Insurance Number;
- ✓ Housing Reference Number;
- ✓ GP Details;
- ✓ Health & Social Care Trust contact details;
- ✓ Criminal / Anti-social behavioural background;
- ✓ Income / benefits;
- ✓ Arrears background;
- ✓ Occupation;
- ✓ Next of Kin details (name, address, relationship, contact number);
- ✓ Family Details;
- ✓ Household details;

We may collect, store and use the following special category data and criminal offence data:

- ✓ Religion;
- ✓ Race/Ethnicity;
- ✓ Medical information;
- ✓ Criminal / Anti-social behavioural background;

We receive the following information from third parties:

- ✓ Benefits information, including awards of Housing Benefit/ Universal Credit
- ✓ Payments made by you to us;
- ✓ Complaints or other communications regarding behaviour or other alleged breaches of the terms of your contract with us, including information obtained from the PSNI;
- ✓ Reports as to the conduct or condition of your tenancy, including references from previous tenancies, and complaints of anti-social behaviour;

How we use your personal data

We will only use your personal data when we have a lawful basis to do so. Our lawful basis for each purpose for which we use your personal data is specified below. Most commonly we will use your personal data in the following circumstances:

- **Consent.** Where you have freely consented before the processing in a specific, informed and unambiguous indication.
- **Performance of a contract.** Where we need to process your personal data to perform a contract with you or where you ask us to take steps before we enter into a contract with you. Where we rely on performance of a contract and you do not provide the necessary information, we will be unable to perform your contract.
- **Legitimate interests.** Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for

our legitimate interests. You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

- **Recognised legitimate interests.** We may sometimes use your personal data because we (or a third party) have a recognised legitimate interest (RLI). These are different to legitimate interests. RLIs apply where there are public interest reasons for processing (such as preventing or detecting crime, safeguarding individuals, responding to emergencies, supporting national or public security or defence, or sharing information with public bodies when they confirm it is necessary for their official functions). RLIs are legally recognised within data protection law. Where we rely on an RLI, we will ensure the use is strictly necessary and only use or share the minimum data required.
- **Legal obligation.** Where we need to use your personal data to comply with a legal or regulatory obligation. Where we rely on legal obligation and you do not provide the necessary information, we may be unable to fulfil a right you have or comply with our obligations to you, or we may need to take additional steps, such as informing law enforcement or a public authority or applying for a court order.

How we use your special category data

We only use your special category data when, in addition to having a lawful basis that is required to process personal data (referred to previously in this notice), there is an additional ground that permits us to do so. Those additional grounds include:

- **Legal claims.** When using your special category data is necessary for establishing, exercising or defending legal claims.
- **Substantial public interest.** When using your special category data is necessary to undertake matters deemed to be of substantial public interest. These include safeguarding vulnerable individuals, preventing or detecting unlawful acts, protecting the public against dishonesty, compliance with regulatory requirements in relation to unlawful acts.
- **Vital interests.** When using your special category data is necessary to protect your vital interests, or someone else's vital interests, in circumstances in which you may be physically or legally incapable of giving consent.

Why we need this information about you and how it will be used:

We need your information and will use your information:

- ✓ to undertake and perform our obligations and duties to you in accordance with the terms of our contract with you;
- ✓ to enable us to supply you with the services and information which you have requested;
- ✓ to enable us to respond to your repair request, housing application and complaints made;
- ✓ to analyse the information, we collect so that we can administer, support and improve and develop our business and the services we offer;
- ✓ to contact you in order to send you details of any changes to our services or supplies which may affect you;
- ✓ to prevent or detect crime and anti-social behaviour;
- ✓ to identify offenders of crime and anti-social behaviour;
- ✓ to promote the safety of our tenants and employees;
- ✓ to safeguard vulnerable individuals;

- ✓ to carry out an investigation and take enforcement action as required;
- ✓ for all other purposes consistent with the proper performance of our operations and business; and
- ✓ to contact you for your views on our products and services.

Body Worn Cameras

The cameras our staff carry will only be activated when there is a perceived threat to staff, tenants, other members of the public, or there is suspected criminal activity or anti-social behaviour. You will be informed by the operator that the cameras are being activated.

Images and audio footage of individuals may be collected on body worn cameras as necessary, to collect such data for the following purposes:

- To deter threatening or anti-social behaviour against our staff
- Corroboration of incident occurring when a staff member is on duty for investigation purposes;
- To reduce the scope of false allegations against staff;
- To protect lone working staff

The data may be:

- used as evidence of harassment or abuse against our staff and customers
- used to detect crime
- Passed to the PSNI or other law enforcement agencies for investigation when evidence of criminality is detected.

Sharing of Your Information:

The information you provide to us will be treated by us as confidential and will be processed only by our employees within the UK. We may disclose your information to other third parties who act for us for the purposes set out in this notice or for purposes approved by you, including the following:

- ✓ If we enter into a joint venture with or merged with another business entity, your information may be disclosed to our new business partners or owners;
- ✓ If we instruct repair or maintenance works, your information may be disclosed to any contractor;
- ✓ If we are investigating a complaint, an alleged crime or an incident of anti-social behaviour information may be disclosed to the PSNI, other law enforcement agencies, Local Authority departments, NI Fire & Rescue Service and any others involved in any complaint, whether investigating the complaint or otherwise;
- ✓ If we are updating tenancy details, your information may be disclosed to third parties (such as utility companies and Local Authority);
- ✓ If we are investigating payments made or otherwise, your information may be disclosed to payment processors, Local Authority and the Department of Work & Pensions;
- ✓ If we are conducting a survey of our products and/ or service, your information may be disclosed to third parties assisting in the compilation and analysis of the survey results;
- ✓ If we partner with a support agency data may be shared for the purposes of referrals.
- ✓ Radius have data sharing arrangements with third parties who process personal data on our behalf as follows:
(NIFHA, RQIA, Tunstall, ALLPAY, EPIC Solutions, Med E-Care, Boots, Forth, Ombudsman, Solicitors (where and when appropriate); BWV Processors.

Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.

Transfers outside the UK and Europe:

Your information will only be stored within the UK and EEA:

Where information is transferred outside the UK or EEA we ensure that there are adequate safeguards in place to protect your information in accordance with this notice.

Security:

When you give us information we take steps to make sure that your personal information is kept secure and safe.

For further information please visit our website www.radiushousing.org or alternatively request a copy of our Data Protection and Compliance Policy from the Data Protection Officer.

How long we will keep your information:

We review our data retention periods regularly and will only hold your personal data for as long as is necessary for the relevant activity, or as required by law (we may be legally required to hold some types of information), or as set out in any relevant contract we have with you.

We will generally keep your information for the following minimum periods:

- ✓ Tenant / Resident / Service User files (Key information) = 6 years after termination of contract after which this will be destroyed if it is no longer required for the reasons it was obtained.

Our full retention schedule is available from the Data Protection Officer at Radius Housing.

Your Rights:

You have the right at any time to:

- ✓ ask for a copy of the information about you held by us in our records;
- ✓ require us to correct any inaccuracies in your information;
- ✓ make a request to us to delete what personal data of your we hold; and
- ✓ object to receiving any marketing communications from us.

If you would like to exercise any of your rights above please contact us at:

**Radius Housing Association
3-7 Redburn Square, Holywood,
BT18 9HZ**

You also have the right to complain to the Information Commissioner's Office in relation to our use of your information. The Information Commissioner's contact details are noted below:

The Information Commissioner's Office – Northern Ireland

**14 Cromac Place, Belfast,
BT7 2JB
Telephone: 028 9027 8757 / 0303 123 1114
Email: ni@ico.org.uk**

The accuracy of your information is important to us - please help us keep our records updated by informing us of any changes to your email address and other contact details.



The content of this Privacy Notice may change periodically. We would advise you to keep up to date with the latest version which will be available on our website or in writing on request.