**Data Subject Rights Request**

The Data Protection Officer

Eastlight House

Charter Way

Braintree

Essex CM77 8FG

Telephone: 0330 128 0330

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| **Please read the following Information** |

**What is this leaflet about?**

This leaflet gives you information on how Eastlight processes and protects your personal information in accordance with the Data Protection law and explains how you can exercise your rights on the information we hold about you.

As the organisation processes personal information regarding individuals (*data subjects*), we are obligated under the UK General Data Protection Regulations (UKGDPR) to protect such information, and to obtain, use, process, store and destroy it, only in compliance with the UKGDPR and its principles.

**The UK General Data Protection Regulations**

The UK General Data Protection Regulations (UKGDPR) gives individuals the right to know what information is held about them, to access this information and to exercise other rights, including the rectification of inaccurate data. The UKGDPR is a standardised regulatory framework which ensures that personal information is obtained, handled and disposed of properly.

As the organisation is obligated under the UKGDPR and UK data protection laws, we abide by the Regulations’ principles, ***which ensure that personal information shall be: -***

1. processed lawfully, fairly and in a transparent manner in relation to the data subject ***(‘lawfulness, fairness and transparency’)***
2. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes ***(‘purpose limitation’)***
3. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ***(‘data minimisation’)***
4. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ***(‘accuracy’)***
5. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed ***(‘storage limitation’)***
6. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ***(‘integrity and confidentiality’).***

The Regulation also requires that *‘the controller shall be responsible for, and be able to demonstrate, compliance with the UKGDPR principles’* ***(‘accountability’)***. Eastlight has adequate and effective measures, controls and procedures in place, that protect and secure your personal information and guarantee that it is only ever obtained, processed and disclosed in accordance with the relevant data protection laws and regulations.

**What information do we collect?**

**Tenants:**

* Tenancy records to manage and support tenancies including where additional support is provided;
* Rent, service charge, rent and arrears account and other financial information;
* Profiled information for internal analysis purposes only;
* Repair, maintenance and property adaptation records;
* Customer feedback and satisfaction;
* Records of tenancy changes (e.g. mutual exchange, succession or an application to purchase);
* Information about specific issues affecting our tenants or their household members (e.g. anti-social behavior, violence and aggression, safeguarding concerns, hoarding, social protection and welfare matters);
* CCTV footage around our property;
* Special category information (e.g. health, ethnicity)
* Photographs;
* Information about our membership.

We record information in our housing management system to deliver our housing management services. Furthermore, we may also record your telephone calls to us, as some calls to our customer service centre are recorded for training and monitoring purposes to ensure we are delivering an excellent service.

We have a self-service portal that enables our tenants to access their rent records, log repairs, update their personal details, notify us of anti-social behaviour, make a complaint or check their rent statements. We collect information when you log in to our portal, for example, to pay your rent or request a repair. We collect your username, password and email address when you register on our resident portal for an account.

The list is not exhaustive, as we hold records of most of the contact, we have with you, or about you, and we process this information, so we can deliver our services to you.

**Leaseholders and Freeholders:**

* Information about the sale/purchase/assignment of a lease or its extension or about the sale of a freehold;
* Information relevant to a lessee’s mortgage or remortgage application;
* Information relevant to service/repairs/other charges;
* Rent review information;
* Information in connection with managing your business lease/tenancy.

We record information in our housing management system to manage and deliver our services to you.

**Staff**

* Recruitment and employee administration records (e.g. performance / absence management and employee relation matters including occupational health and criminal records checks);
* Contractual and other benefits (such as pension) information;
* Payroll records and bank account information;
* Family/next of kin information;
* Nationality/immigration information and criminal background;
* Driving licence/qualifications an insurance information; and
* Information about personal characteristics (e.g. ethnic origin).

We record information in our HR database to manage and deliver recruitment and employment services to prospective, current and past employees and those expressing an interest in working with us.

**Contractors, suppliers and other third parties**

* Basic contact details and any other information they may share in routine correspondence and enquiries with us.

We may also collect information about you for a number of other reasons, including:

* monitoring equality and diversity
* prevention and detection of crime
* regulatory purposes
* if we are required to by law.

Further information on what constitutes personal information and your rights under the data protection regulation and laws can be found on the Information Commissioners Office (ICO) [website](https://ico.org.uk/for-the-public/). You can also read our privacy policy at <https://www.eastlighthomes.co.uk/> for more detailed information on how we use your information.

**What are your rights? (The Right of Access)**

Under Article 15 of the UKGDPR, an individual has the right to obtain from the controller, confirmation as to whether or not personal data concerning them is being processed. We are committed to upholding the rights of individuals and have dedicated processes in place for providing access to personal information. Where requested, we will provide the following information*: -*

* the purposes of the processing
* the categories of personal data concerned
* the recipient(s) or categories of recipient(s) to whom the personal data have been or will be disclosed
* If the data has been transferred to a third country or international organisation(s) (*and if applicable, the appropriate safeguards used)*
* the envisaged period for which the personal data will be stored
* where the personal data was not collected directly from the individual, any available information as to its source.

# Your Other Rights

Under the UKGDPR, you have the right to request rectification of any inaccurate data held by us. Where we are notified of inaccurate data, and agree that the data is incorrect, we will amend the details immediately as directed by you and make a note on the system *(or record)* of the change and reason(s).

We will rectify any errors within 30-days and inform you in writing of the correction and where applicable, provide the details of any third-party to whom the data has been disclosed.

If for any reason, we are unable to act in response to a request for rectification and/or data completion, we will always provide a written explanation to you and inform you of your right to complain to the Supervisory Authority and to seek a judicial remedy.

In certain circumstances, you may also have the right to request from Eastlight, the erasure of personal data or to restrict the processing of personal data where it concerns your personal information; as well as the right to object to such processing. You can use the contact details above to make such requests.

**Automated decision making**

Some elements of our recruitment processes include automated decision making, for example, application forms received for job vacancies are automatically sifted on Rights to Work in the UK, if answered ‘No’, this will stop the application process proceeding. If answered ‘Yes’, further sifting can take place on keywords outlined in the essential and desirable criteria required for the role. There may also be automated decision-making dependent on the requirements for the role, for example, a driving licence and use of a car may be required (if suitable for the role)

**How do you ask to see your information?**

You may exercise your rights verbally or in writing. If you make your request verbally, we recommend you follow it up in writing to provide a clear trail of correspondence. It will also provide clear evidence of your actions. You may also email us at DPA-FOI@Eastlighthomes.co.uk If you make your request through our website or by writing, please mark it for the Attention of The Data Protection Officer at Eastlight Community Housing Ltd, Eastlight House, Charter Way, Braintree, Essex, CM77 8FG. We have also attached a Data Subject Rights request form you may find useful at the bottom of this document.

We will comply with your request where feasible to do so, within one month of receiving your request and appropriate identification documentations.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and only disclosed to the right person.

Also, please arrange a time to submit the following:

* Identification to confirm name, address and signature, for example, driving licence, passport or recent utility bills etc.
* Authority to Act is needed if you are asking someone to represent you. Please fill in the relevant section of the form. Identification of this person will also be requested.

If you have difficulties completing the form please contact the Data Protection Officer on 0330 128 0330, who will be happy to help you. If you fail to supply the information indicated above, we may not be able to respond to your request.

**What happens next?**

Eastlight has 30 calendar days in which to comply with the request free of charge. This period will start once your identity and request have been confirmed. However, where the retrieval or provision of information is particularly complex or is subject to a valid delay, the period may be extended by two further months. If this is the case, we will write to you within 30 days and keep you informed of the delay and provide the reasons.

Whilst we provide the information requested without a fee, further copies requested by the individual may incur a charge to cover our administrative costs.

 You will be supplied with the personal information we hold on you that you are entitled to receive. However, your right to see certain information may be limited. The UKGDPR contains certain exemptions from the provision of personal information. If one or more of these exemptions applies to your subject access request or where Eastlight does not act upon the request, we shall inform you at the earliest convenience, or at the latest, within one month of receipt of the request.

Where possible, we will provide you with the reasons for not acting and any possibility of lodging a complaint with the Supervisory Authority and your right to seek a judicial remedy. Details of how to contact the Supervisory Authority are laid out below

**What to do if you feel your information is not being processed correctly**

If you feel the information, we hold on you is not being processed according to the information detailed in this leaflet, please contact us in writing. The Data Protection Officer

will carry out an assessment and respond to you.

If you are dissatisfied with the service you receive, you can submit a formal complaint via our complaint’s procedure. Please visit our website at <https://www.eastlighthomes.co.uk/contact-us/feedback-complaints/> for our complaint policy/procedure

## Supervisory Authority

If you remain dissatisfied with our actions, you have the right to lodge a complaint with the Supervisory Authority. *The Information Commissioner’s Office (ICO) can be contacted at: -*

Information Commissioner’s Office

Wycliffe House

Water Lane

Wilmslow, Cheshire

SK9 5AF

Telephone: 0303 123 1113 *(local rate)* or 01625 545 745 *(national rate)*

Fax: 01625 524 510, Email: enquiries@ico.org.uk

Visit the ICO’s website www.ico.org.uk for further information.

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| **Data Subject Rights Request Form**  |

**Section One – Personal details**

Title: ….... First Name: ……………………… Surname: ……………………………..

Date of Birth: …………………………………………………………………………………

Current Address: ……………………………………………………………………………………………………………………………………………………………………………………………………

Previous Address(s) if relevant to request:

……………………………………………………………………………………………………………………………………………………………………………………………………

Telephone number/s: ………………………………………………………………………

Relationship with Eastlight (e.g. tenant, leaseholder, former resident, housing applicant, current or former employee, contractor).

I am a …………………………………………………………………………………………

I have enclosed:

Proof of identification:

* Showing your identity and address, e.g. utility bill
* Showing your signature e.g. driving license

**Section Two - Appointing a representative to act on your behalf**

Please complete this section if relevant.

I would like the appointed person/agency/organisation to act on my behalf and receive all the personal information I am entitled to receive. The person/agency/organisation acting on my behalf is:

Name: …………………………………….. Telephone number: …………………………

Address: ………………………………………………………………………………………

Relationship to you: …………………………………………………………..……………...

Signature of representative: ………………………………………………..……………….

**Section 3 – Full description of the rights you are exercising / information you are requesting**

Please explain in full the right you are exercising and or information you are requesting, together with any information or descriptions that will help us to fulfil your request, identify and locate the information. Failure to describe the right you are exercising or the information you are requesting may delay or prevent Eastlight processing your request. Where possible, indicate dates and names of people you have had contact with.

I would like Eastlight to:

From date: .................................. to date: ..................................

(Please continue on a separate sheet if more space is required)

**Section 4 – Declaration**

I confirm that the information given by me and/or my agent on this form is true. I understand and agree that the information I and/or my agent has supplied is for the purpose of making and the processing of this request for exercising my right and or access to my personal information only. I understand that any attempt to mislead or impersonate or attempt to impersonate another individual may be a criminal offence.

**Signature:** ………………………………………………..… **Date:** ………….……..

I will collect this information/I require this information to be posted/ please send electronically. (delete as necessary)

If you are a joint tenant and the information requested involves this joint tenant, please fill in the details below to confirm they have provided their consent to share the information. Please include their identification also:

**Name of joint tenant:** …………………………………………….…………………...

**Signature:** ………………………………………………..… **Date:** ………….…..….

Thank you for completing this form.