

## **One Manchester Privacy Statement**

**This privacy policy explains how we use any personal information we collect about you when you use our services.**

One Manchester respects an individual's right to data privacy and data protection in line with data protection legislation. By this we mean the Data Protection Act 2018.

This Privacy Statement has been developed in order to advise you of how One Manchester will collect, store, use, share, and protect (collectively known as 'process') the personal/sensitive personal/special category information (collectively known as 'information') it comes into contact with. If you have a tenancy or other written agreement with us it may contain further information about our processing of your information.

By giving One Manchester your information or by using our website or platforms you are confirming that you are accepting the practices outlined in this Privacy Statement. If you do not accept the outlined practices, please do not give us any information or use our website platforms/portals.

We reserve the right to make changes to this Privacy Statement at any time and we recommend that you regularly review this Privacy Statement to ensure that you are aware of any changes and how your information will be used.

For the purposes of the data protection legislation, One Manchester is the Data Controller (i.e. the company who is responsible for and controls the processing of your personal data) of the information that that you supply it with and on occasion this information may be shared with a third party who will act as a Data Processor to carry out a specified function on behalf of One Manchester.

If you have any requests concerning your personal information or any queries regarding this Privacy Statement, please contact us.

### **Who are we?**

One Manchester is a registered provider of social housing and a developer of property for market sale and lease. Our registered office is; Lovell House, Archway 6, Manchester, M15 5RN.

One Manchester is listed with the Office of the Information Commissioner as a Data Controller with the reference number; ZA111141.

One Manchester is the **Data Controller** and is responsible for your personal information. We have appointed a Data Protection Officer.

### **Contacting us**

If you need to contact us, regarding the use of your information, please contact [DPO@onemanchester.co.uk](mailto:DPO@onemanchester.co.uk) or write to;

Lovell House, Archway 6, Manchester, M15 5RN.

## **What does this Privacy Statement apply to?**

This Privacy Statement applies to personal/sensitive and personal/special category information (collectively known as 'information') that we collect from or about our customers or visitors to our website, platforms or portals.

The methods in which we collect this information are;

- One Manchester website and mobile site
- One Manchester's online portals
- Call centres
- Application forms
- Personal interview
- Data from third parties and other publicly available sources
  - This is information that we may obtain about you from other sources. An example of this is that we may hire a third-party organisation to collect information on our behalf to conduct tenancy/other surveys; this would be done in order to provide us with additional information on our tenants in order to shape/improve our service delivery.

## **What information is being collected?**

How you interact with us determines what information we collect from you.

We aim to limit the amount of information we process to that which is necessary to provide you with our services.

In order to limit information requests, we will combine information that we receive from different sources and process it together.

The types of information that we collect from you can be categorised as;

### **Personal information**

This is information that could be used to identify you as an individual;

- Names (including previous names)
- Date of birth
- Marital status
- Nationality
- Residential status
- Income
- Employment
- National insurance number

This type of information is what One Manchester would have collected from you in order to access as service or apply for/enter into a contract with us.

### **Sensitive personal information/special category information**

In order to access some of One Manchester's services, and for legislative requirements, it may be necessary to collect your sensitive personal/special category information. This type of information includes;

- Gender
- Race
- Ethnicity
- Religion
- Health
- Physical or mental health medical needs
- Financial (Income, Outgoings, Bank information, Creditor Information)

### **Criminal convictions and offences**

We will collect information relating to criminal convictions from applicants to ascertain whether they are unsuitable to be a tenant of One Manchester by reason of their behaviour or the behaviour of a member of their household. This information may be shared with senior representatives from the National Probation Service, Community Rehabilitation Company, Greater Manchester Police, Directorate for Adults, Registered Providers and One Manchester staff (on a need to know basis only).

In order to manage anti-social behaviour cases, it may be necessary for existing tenants to disclose their unspent criminal conviction/s and offences.

### **Personal contact information**

This is the information that you have given us in order for us to be able to contact you and includes;

- Telephone numbers
- Email addresses
- Alternate postal addresses and in case of emergency
- Next of kin details

### **Online account login information**

If you have set up an online account with One Manchester, this would refer to; name, surname, password, tenancy number, NINO you would have to use manage your account.

### **Technical computer information**

This is information we collect about computer/smart phone/tablets, when used to access our website, platform or portal. This information is usually collected through cookies and can include the IP address, operating system and browser; if accessing which through a smart phone this can also include the phone ID.

### **Visitor feedback/complements**

This is information you voluntarily share with us about your experience with One Manchester and includes unsolicited comments, suggestions and feedback which is typically collected in surveys, user groups, contact forms and emails.

### **Information about other individuals**

If you give us information on behalf of someone else, you can confirm that the other person has appointed you to act on his/her behalf and has agreed that you can give consent on his/her behalf to the processing of his/her personal data and receive on his/her behalf any data protection notices.

### **Monitoring**

We may monitor and record communication with you (such as telephone conversations and emails) for the purpose of quality assurance, staff training, fraud prevention and dispute resolution.

### **What do we use your information for?**

The following describes the various purposes for which One Manchester might process your information and the different types of information that might be collected from you.

Please note that not all the uses will be relevant to every customer/visitor.

### **Tenancy management**

In order to maintain your tenant account with us, we may use the information that was given to us when the account was initially setup, this would include your personal information and contact information along with people you had indicated will be moving in with you (household).

### **Service provision**

For us to provide services consistent in providing sustainable tenancy, it may be necessary to process a customer's sensitive personal/special category information. An example of this is when accessing welfare rights service, with consent, we would use a customer's income and outgoings to establish benefit entitlement.

### **Customer service**

Customer service can be provided through different means i.e in person, by email, or over the phone. During these interactions, we may collect and use your personal and One Manchester account information to validate your identity and your contact information to respond to your enquiry.

### **People who email us**

We use Transport Layer Security (TLS) to encrypt and protect email traffic in line with the email information security policy. If your email service does not support TLS, you should be aware that any emails we send or receive may not be protected in transit,

**Use of CCTV** – we use CCTV for the prevention, detection and investigation of anti-social behaviour and crime. We comply with the DPA 2018 under the use of CCTV and the Information Commissioner's current CCTV Code of Practice.

We may disclose CCTV footage to;

- Law enforcement agencies, where it is believed that the images will assist in a legal enquiry
- Prosecuting agencies
- Legal representatives

Residents and other third parties may not view CCTV footage, with the exception of residents who have been recorded on the CCTV and make a Subject Access Request that has to be agreed by our team.

If your property e.g. your car has been criminally damaged, you should report the damage/matter to the police and your insurers.

We hold CCTV recordings, not subject to an investigation, for a maximum of 28 days. For more information on this, please contact your Neighbourhood Safety Team on 0330 355 1000.

### **Customer engagement**

For service improvement and to encourage customer/visitor engagement, we may collect or feedback information.

### **Contests and promotions**

On occasion we may run competitions whether through One Manchester's platform for which entry will require customer's/visitor's personal information. For compliance purposes, the information and general location of the winner may be published or shared.

### **Children**

In accordance with the Data Protection Act 2018, One Manchester will also seek consent from parent/guardian of children in order to process their information and if they're over 16 years old, we will seek their consent.

### **Marketing and communications**

We may collect and use your personal and contact information to send you marketing communication, such as emails, text messages, and postal mailings. These communications will keep you up to date on the latest One Manchester news and events that may be of interest to you.

We will only send you marketing materials that you have consented to receive, and consent can be withdrawn at any time. Legally there are communications that we are obliged to send you and from which you cannot withdraw consent, an example of this is the annual rent statement.

If you participate in a promotion that involved a third party and you agree to receive marketing information from them, you'll need to contact them directly to withdraw consent from receiving further marketing materials from them.

### **Monitoring requirements**

For legal compliance, monitoring purposes and to meet our obligation on Equality and Diversity, we may use your personal and sensitive personal/special category information. An example of this is for the Equality and Diversity monitoring purpose; we collect information on your gender, ethnicity and race.

### **Other purposes**

Where we have received personal information from other sources, we may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

### **Protecting your personal information**

One Manchester are committed to ensuring your information is safe and secure. In order to prevent unauthorised access or disclosure, we have implemented and maintained suitable physical,

electronic and managerial procedures to safeguard and secure the information collected online. We aim for our customers to be completely confident in using our services, therefore we regularly review our processes and procedures to protect your personal information from unauthorised access, use, accidental loss, destruction or disclosure.

### **Refusing to give us personal information**

There are occasions where you may not want to share with your information with us, or withdraw previous given consent, it is within your rights to refuse or withdraw consent, however, it may mean the services we are able to provide you will be limited.

Please note that there are some items of information that you cannot refuse or withdraw consent from if you wish to enter or remain in contact with One Manchester.

### **Disclosing your personal information**

We will never share information with any third party that intends to use it for direct marketing unless we have received specific consent from the individuals involved.

There are occasions where we will need to share your information with selected third parties, on these occasions One Manchester will have a data sharing agreement in place which ensures the third party keeps information private, secure and processed only in the way intended and specified by One Manchester.

Consent – in some instances, One Manchester will require your specific informed consent to process your information, on these occasions, the consent be requested from you and the information recorded, and you have the right to withdraw your consent at any time.

We share information with the following types of third parties;

**Contractors** – in order to provide a service to you, it may be necessary for One Manchester to appoint a contractor; an example of this would be carrying out your annual gas safety service or roof repairs. The contractor would need to your name and address, and in some cases your contact details in order to carry out the appointment and complete the necessary documentation.

**Legal and business transfer** – there are occasions where One Manchester is required by law to disclose your information, for example, to comply with legal proceedings or to protect the safety or rights of One Manchester, its customers or the general public. This includes:

- HM Revenue & Customs, The Claims Management Regulator (To be absorbed by the Financial Conduct Authority), Regulators and other authorities acting as processors based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Accountants, Solicitors, Compliance Consultants and other like services acting as processors based in the United Kingdom who require the reporting of processing activities in certain legal and compliance circumstances.

In the event of a merger/acquisition of part of the whole organisation, the partner/new owner will have access to the information obtained by One Manchester and its information could be

transferred as part of the reorganisation or similar event if permitted by and carried out in accordance with the applicable law.

**Debt Solution Providers** – Depending on the service you have engaged (The One Money Team); we will disclose minimised personal information to a Debt Solution Provider who is able to assist with setting up and maintaining a Debt Solution. We will always request consent to share this information with any third-party Debt Solution Providers. No Information will be shared with these third parties otherwise. We work with several for-profit and not-for-profit organisations depending on the Debt Solution that had been determined as most suitable to your personal circumstances.

### **International Transfers**

We do not transfer your personal data outside the European Economic Area (EEA).

### **Your individual rights**

Under the Data Protection Act 2018, you have the right to know how One Manchester processes your information these rights include;

#### **Right to be informed**

You have the right for us to explain to you clearly why we are collecting your information, how it will be processed, for how long, and who we will be sharing it with. For more information on, please contact our customer services team, or alternatively email [DPO@onemanchester.co.uk](mailto:DPO@onemanchester.co.uk).

#### **Right of access**

You have the right to access the personal information that we hold about you, to know what we hold, in what format it is in and to have a copy of it if you wish. This is called a subject access request and it is free of charge. For more information on a subject access request, please email us on [DPO@onemanchester.co.uk](mailto:DPO@onemanchester.co.uk).

#### **Right to rectification**

If the information we hold about you is incorrect, you can ask us to correct our records. You can do this by contacting our customer services team, or alternatively [DPO@onemanchester.co.uk](mailto:DPO@onemanchester.co.uk). There may be occasions where we require additional information in order to process your request, for example a name change as we would need proof of the change of name. You will need to inform us what information is incorrect and what it should be replaced with.

#### **Right to erasure**

You have the right to request that data held about you by One Manchester which identifies you is deleted. Please note that we may be compelled to maintain your information due to specific legislative or regulatory requirements, e.g. we will keep a copy of invoices in case of an HMRC investigation and if you have held a contract with us, we will retain that information. Erasure of your data may also affect your tenancy. You can make this request by contacting our customer services team or [DPO@onemanchester.co.uk](mailto:DPO@onemanchester.co.uk).

#### **Right to restrict processing**

You have the right to request for One Manchester to restrict the processing of your personal data in certain circumstances. This means that you can limit the way we use your data where you have a particular reason for wanting the restriction. You can make this request by contacting our customer services team or [DPO@onemanchester.co.uk](mailto:DPO@onemanchester.co.uk).

### **Right to object**

You can object to the processing of your personal data in certain circumstances. You have the absolute right to object to the processing of personal data if it is for direct marketing purposes. You can make this request by contacting our customer services team or [DPO@onemanchester.co.uk](mailto:DPO@onemanchester.co.uk).

### **Right to data portability**

You have the right to receive the personal data you have provided One Manchester in a structured, commonly used and machine readable format. You also have the right to request that we transmit your personal data to another controller. You can make this request by contacting our customer services team or [DPO@onemanchester.co.uk](mailto:DPO@onemanchester.co.uk).

If you wish to raise one of the above rights, please contact our customer services team, or email [DPO@onemanchester.co.uk](mailto:DPO@onemanchester.co.uk).

One Manchester will ensure we comply with your request in the specified time limits required by law, whilst not breaking any other regulations in the process.

### **Right to Complain to the Supervisory Authority (Information Commissioners Office)**

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### **Tracking technology**

#### **Cookies**

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. The information contained within the cookie can include the IP address, operating system and browser information. This information is used to track visitor use of the website and to compile statistical reports on website activity. For further information, please visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

You can set your browser to not accept cookies and the above websites tell you how to remove cookies from your browser, however in a few cases some of our websites features may not function as a result.

#### **Spamming**

Spamming is where unsolicited emails are sent to you containing advertisements or marketing related materials without your consent.

In accordance with the Data Protection Act 2018, One Manchester will not send you spam emails and we will not share your email address with third parties for them to use in this way.

If for some reason you believe you have received spam emails from One Manchester, please contact [DPO@onemanchester.co.uk](mailto:DPO@onemanchester.co.uk).

## **How long do we keep your personal information (Data Retention)?**

### **What is Data Retention?**

“Data Retention is the process of recording and storing data with the purpose of later use” We are required by law to maintain records and ensure the protection of important information against data loss.

### **How long will we hold your personal data?**

We will only retain your personal data for as long as is necessary to fulfil our obligations under the provision of our service as well as any purposes necessary to satisfy any legal, accounting or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk, of harm of unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, including applicable legal requirements.

Details of retention periods for different aspects of your personal data are available upon request. Please see Section 3. By law we have to keep certain information about our customers and this data will be held solely and securely for those legal purposes.

In some circumstances you can ask us to delete your data under the ‘Right to Request Erasure’ However, an erasure request may be partially declined. In the event a complaint has been made, coupled with an erasure request, we will maintain records relating to the complaint, including basic information such as name, and telephone name. In the event that you do not wish to be contacted by us, we are required to maintain a log of this request, withholding applicable data to ensure we no longer contact you further.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

### **Links to third party sites**

On occasion our websites/platforms may have links to third party sites, visiting these sites is done so at your own risk and we do not control or have any responsibility or liability for the content or practices of any third party site, application or feature. Please check the relevant third party’s privacy policies before you submit any personal data to these websites.

**This Privacy Policy was last reviewed and updated; 15/07/2019**