

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 1998 up to and including 24 May 2018 and the General Data Protection Regulation (GDPR) thereafter.

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 may be used. We anticipate making further changes to this Privacy Statement as part of our compliance and planning for the introduction of the GDPR.

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 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 with regard to 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 whose 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**

You can contact the Information Commissioner's Office in the following ways:

• **Phone:** 0303 123 1113



- Email: <u>casework@ico.org.uk</u>
- Live chat.
- **Post:** Information Commissioner's Office
 - Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

What does this Privacy Statement apply to?

This Privacy Statement applies to personal/sensitive personal/special category information (collectively known as 'information') that we collect from or about our customers or visitors to our websites, 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 interviews
- Data from other 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 reasonably 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:

- name (including previous names)
- date of birth;



- marital status;
- nationality;
- residential status;
- income;
- employment;
- and national insurance number.

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

Sensitive Personal Information/Special category information

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

- gender;
- race;
- ethnicity;
- religion;
- health;
- physical or mental health medical needs;
- incomes and outgoings; and
- bank details;

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; and



• 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 to manage your account

Technical computer information

This is information we collect about computer/smart phone/tablet, 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 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 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 is/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 of 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

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In order 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 Services 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 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 CCTVs for the prevention, detection and investigation of anti-social behaviour and crime. We comply with the GDPR under the use of CCTV and the Information Commissioner's current CCTV Code of Practice.

We may disclose CCTV footage (by way of a DVD or other suitable method) 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 to 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 about 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 General Data Protection Regulation, 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 communication items that we are legally 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 & 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 us this information and the combined information for the purposes set out above (depending on the types of information we receive).

Protecting your personal information

We are committed to ensuring that your information is secure. At all times, One Manchester will take both technical and organisational measures to protect the confidentiality and security of personal information, irrespective of the method of collection.



Refusing to give us personal information

There are occasions where you may not want to share with us your information or withdraw previously given consent, it is within your rights to refuse or withdraw consent however, it may mean that the services we are able to offer you are limited and you are unable to access personalised features.

Please note that there are some items of information that you cannot refuse or withdraw consent from if you wish to enter into or remain in a contract 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 that the third party keeps information private, secure and processed only in the way specified by One Manchester.

Information will only be shared with the following types of third parties:

Consent

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

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 know your name and address in some cases your contact in order to carry out the appointment and correctly the necessary certificate/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.

In the event of a merger/acquisition of part or 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 reorganisation or similar event if permitted by and carried out in accordance with the applicable law.



Your individual rights - accessing and amending your personal information

Under the General Data Protection regulation (GDPR), you have rights to how One Manchester processes your information.

These rights include:

Right to be informed

You have the right for use to explain to you clearly why we're collecting your information, how will it be processed, for how long, who we will be sharing it with

Right to access

You have the right to access the personal information that we hold about you, to know what we hold, in wat format is it in, and to have a copy of it if you wish. This is called a Subject Access Request (SAR) and it's free of charge. This is more formal than for example, asking for a second copy of your rent statement. For more information on SAR, please email us at DPO@onemanchester.co.uk

Right to rectification

If the information we hold on you is incorrect, you have the right to ask us to correct it without undue delay and free of charge. You can exercise this right by contacting us at <u>DPO@onemanchester.co.uk</u> or our customer service team. There may be occasions where we require additional information in order to process your request – example of this are name change, needing proof of the change of name – and your will require to specify the information is incorrect and what it should be replaced with.

Right to Erasure/be Forgotten

You have the right to request that all data held about by One Manchester which identifies you is deleted. You can also make this request at any time free of charge by contacting us at: <u>DPO@onemanchester.co.uk</u> but please note that we may be compelled by to maintain your information due to specific legislative or regulatory requirements, for example, we keep copy of invoices in case of an HMRC investigation and if you have held a contract with us, we will retain that information.

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 visit: <u>www.aboutcookies.org</u> or <u>www.allaboutcookies.org</u>.

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

Spamming

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

In accordance with the General Data Protection Regulation, 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.

No information you share with One Manchester will be used for direct marketing unless you give us your consent which can be withdrawn at any time.

If for some reason you believe you have received spam e-mail from One Manchester, please contact our Data Protection inbox at <u>DPO@onemanchester.co.uk</u>

How long do we keep your personal information?

We will only keep your information as long as is reasonably necessary and in line with our Data Retention Policy. This does mean that your information may be retained for a period of time after you have stopped using One Manchester services or our website/platforms.

Links to third-party sites

On occasion our website/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.

Contacting us

If you need to contact us, regarding the use of your information, please do so using our website or write to the Data Protection Officer:

Lovell House,

Archway 6,

Manchester,

M15 5RN

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Email: DPO@onemanchester.co.uk

Phone: 0330 355 1000

Legal notice and version control

On occasion One Manchester will make amendments to this Privacy Policy. We recommend that you check this Privacy Notice regularly to see the changes and how they may affect you.