

BERNICA

Your privacy matters

Your guide to our privacy practices



Delivering
exceptional
housing
services

Your privacy matters

At Bernicia Group (Bernicia), we're committed to protecting and respecting your privacy

This policy explains when and why we collect personal information, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

Our policy applies to information about applicants, customers and other service users.

By giving Bernicia your information or by using our website you are confirming that you're agreeing to be bound by this policy.

We may change this policy from time to time so we recommend that you occasionally review this privacy statement to ensure you are aware of any changes and how your information may be used.

Any questions about this policy and our privacy practices can be made by:



Email: info@bernicia.com



Phone: 0344 800 3800



In writing: Bernicia Group
Oakwood Way
Ashwood Business Park
Ashington
NE63 0XF



Who are we?

Bernicia Group (Bernicia) is a registered provider of social housing and a developer of affordable housing products whose registered office is Bernicia Group, Oakwood Way, Ashwood Business Park, Ashington NE63 0XF.

Bernicia is registered with the Information Commissioner as a Data Controller under reference ZA329579.

We have an appointed Data Protection Officer (DPO) to oversee our processing of personal information.

Why do we collect and store personal information?

We need to collect, process and store personal information about you and other household members or sometimes relatives* in order to fulfil our obligations as a social landlord and to deliver efficient and effective services.

*When you provide information about household members or relatives, it is your responsibility to ensure this is done with their full knowledge and consent.

How do we collect information about you?

The methods by which we collect personal information are:

- Website
- Customer portal 'My Bernicia'
- Call centre
- Personal interviews
- Application forms
- Data from other sources.

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How do we manage your personal information?

Processing of your personal information will be undertaken in accordance with the principles of the UK Data Protection Act 2018 (the Act) and the EU General Data Protection Regulation (the Regulation).

Access to personal information is restricted to authorised individuals on a strictly need to know basis. We will treat your personal information fairly and lawfully and we will ensure that information is:

- Processed for limited purposes
- Kept up to date, accurate, relevant and not excessive
- Not kept longer than is necessary
- Kept secure.

We are committed to keeping your personal details up to date and we encourage you to inform us about any changes needed to ensure your details are accurate. To help us to ensure confidentiality of your personal information we may ask you security questions to confirm your identity when you call us and as may be necessary when we call you.

We will not discuss your personal information with anyone other than you, unless you have given us prior written authorisation to do so. Anyone calling on your behalf may also be subject to security questions to ensure we're taking adequate steps to protect your personal information.

We may apply markers to your information (for example, in relation to your vulnerability or health status) to enable us to tailor and deliver services to you. We only hold records during the period of our relationship with you and for a set period afterwards to allow us to meet our legal obligations including resolving any follow up issues between us.



What information do we hold about you?

The information we hold on our records concerns our relationship with you. For example:

- We hold names and dates of birth, photographic ID and information about your previous housing circumstances to assess housing applications
- We hold your contact details so we can communicate with you, and keep you informed about other services we offer that may be useful to you
- We record information about your needs and requirements to ensure our services are accessible; that we take into account any support needs in our dealings with you and to improve communications with you. For example, if you are involved with a carer or social worker or if you need large print or translated text
- We record information to help us deliver housing management services including reports of anti-social behaviour, complaints and change in circumstances, for example, if you need to move home
- We keep financial records about the amount of money you have paid us; any amount(s) outstanding and associated recovery action. Depending on your chosen method of payment we may hold your bank details
- We may hold recordings of your telephone calls to us as some calls to our business are recorded for training and monitoring purposes. This is to ensure we're delivering a good service and to assist in dispute resolution
- We may capture your image on CCTV if you visit an estate, scheme, office or community venue which is covered by this facility
- We may carry out insight and satisfaction surveys to help us monitor our performance and improve our services to customers.

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

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Generally, the information we hold will have been provided by you (on application or enquiry forms or when we communicate with you), but we may also hold information provided by third parties where this is relevant to your housing circumstances for example from social workers and health professionals (such as doctors and occupational therapists).

We will only ask for personal information that is appropriate to enable us to deliver our services. In some cases, you can refuse to provide your details if you deem a request to be inappropriate. However, you should note that this may impact our ability to provide some services to you if you refuse to provide information that stops us from doing so.

The types of information collected from you can be categorised as:

Personal information

This information could be used to identify you as an individual:

- Name (including previous names)
- Date of birth
- Marital status
- Nationality
- Residential status
- National insurance number.

Sensitive personal information / special category information

In order to access some Bernicia services and for legislative purposes it may be necessary to collect your sensitive personal / special category information, which may include:

- Gender
- Race
- Ethnicity
- Physical or mental health needs
- Income and outgoings
- Bank details.



Criminal convictions and offences

To manage anti-social behaviour it may be necessary for applicants and existing tenants to disclose their unspent criminal convictions and offences.

Personal contact information

This is the information that you have given us in order that we are able to contact you, this includes:

- Telephone numbers
- Email address
- Alternative postal addresses
- Next of kin or appointed representative.

Account log in information

If you set up an online account with 'My Bernicia' this would refer to the username, password and answers to the security questions you would use to manage your online account.

Customer feedback

This is the information you voluntarily share with us about your experiences of Bernicia and includes unsolicited comments, suggestions and feedback which is typically collected in surveys, contact forms and emails.



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What is the lawful basis for processing information?

Our legal bases for processing your information for all the above purposes are:

- **Contract:** Processing is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract.
- **Legal obligation:** Processing is necessary for us to comply with the law (not including contractual obligations).
- **Vital interests:** Processing is necessary to protect someone's life.
- **Legitimate interests:** Processing is necessary for our legitimate interests, or the legitimate interests of a third party, unless there is a good reason to protect your personal data which overrides those legitimate interests.
- **Consent:** You have given clear consent for us to process your personal data for a specific purpose.



Under what circumstances will personal data be shared?

Normally, only our employees will be able to see and process your personal information. However, there may be times when we will share relevant information with third parties. When sharing personal information, this will be done on a strictly need to know basis and we will comply with all aspects of the Data Protection Act and the General Data Protection Regulation.

Sensitive information about health, sexual orientation, race and religion is subject to particularly stringent security and confidentiality measures. Such information may be used for equality and monitoring purposes.

Where necessary or required, we may share your personal information as follows:

- With our contractors to undertake some repairs, maintenance or improvement works
- With third party service providers in connection with services performed on our behalf. For example, if we use a mailing house to distribute our newsletters
- Our relationships with such providers are governed by our contracts with them which include strict data sharing and confidentiality protocols
- With other registered providers, trusts and landlords in connection with tenancy references and associated enquiries
- With community partners in connection with the delivery of coordinated local services
- With utility companies (and their representatives) and Council Tax Offices to ensure billing details are correct
- With credit reference agencies and debt collection agencies in connection with housing sales and in relation to any outstanding charges
- With local authorities and government departments as necessary for administering justice, or exercising statutory, governmental or other public functions

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- With police and other relevant authorities (for example Probation Service, Department of Work and Pensions, HM Revenues and Customs) in relation to the prevention or detection of crime and fraud; the apprehension or prosecution of offenders and the assessment or collection of tax or duty
- With other statutory organisations for example social services and health authorities as necessary for exercising statutory functions
- With the Regulator of Social Housing (RSH) to comply with our regulatory obligations
- With our insurers, in the case of public liability claims and similar
- With our solicitors
- With Banks, for example, to carry out payments through a secure system
- With mediation and advocacy partner organisations.

This list is not exhaustive as there are other circumstances where we may also be required to share information, for example:

- To meet our legal obligations
- In connection with legal proceedings (or where we are instructed to do so by Court Order)
- To protect the vital interests of an individual (in a life or death situation).



How will personal information be protected?

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

Will personal information be transferred internationally?

We do not envisage transferring any information about you or relating to you who is located outside of the European Economic Area other than indicated above and we have a commitment from our business partners and data processors that they will honour this commitment.

What about children's data?

Children's data is collected and processed in accordance with the information above. Parents, guardians and adults acting in place of a parent are expected to ensure that children they are responsible for are aware of how their personal information will be processed by us.



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What rights do I have about my personal information and how it is used?

You have rights under the Data Protection Act and the General Data Protection Regulation regarding the information Bernicia processes about you.

These rights include:

- **Marketing** - You have the right to ask us not to process your personal data for direct marketing purposes. We will ask you when we collect your personal data if we can use your information for such purposes or if we can disclose information to any third party for such purposes. You can opt out of receiving such marketing at any time.
- **Right of access** - You have the right to access the personal information that we hold about you; to know what we hold, what format it is in, and have a copy of it if you wish. This is called a Subject Access Request (SAR).

This is a more formal process than, for example, requesting something like a copy of your rent statement. Our staff will explain when your enquiry falls under the Subject Access Process.
- **Right to rectification** - If the information we hold on you is incorrect you have the right to ask us to correct it quickly and free of charge. You can exercise this right at any time by contacting us. There may be occasions where we require additional information in order to process your request such as a name change needing proof of the change of home. You will be required to specify the information that is incorrect and what it is to be replaced with.
- **Right to erasure/Right to be forgotten** - You have the right to request that all data held by Bernicia which identifies you is deleted. You can make this request at any time by contacting us but please be aware that we may have to retain your information due to specific legislative or regulatory requirements.
- **Consent** - In some cases Bernicia will require your specified consent to process your information, in these occasions consent will be recorded and you have the right at any time to withdraw consent. This will include photographs taken for use on our website or in our publications.



How long will personal data be kept?

We will only hold your data for as long as reasonably necessary and in line with our Data Retention Schedule. This does mean that your data may be retained for a period of time after you have stopped using Bernicia's services.



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Further information

For further information on how to request your personal information and how and why we process your information, you can contact us using the details below:



Email: dpo@bernicia.com



Phone: 0344 800 3800



In writing: Data Protection Officer
Bernicia Group
Oakwood Way
Ashwood Business Park
Ashington
NE63 0XF



The Information Commissioner (ICO) is also a source of further information about your data protection rights. The ICO is an independent official body and one of their primary functions is to administer the provisions of the UK Data Protection Act 2018 and the EU General Data Protection Regulation. You also have a right to lodge a complaint about any aspect of how we are handling your data with the ICO and can do so at the following address:



Online: www.ico.org.uk



Phone: 0303 123 1113



In writing: Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Changes to this privacy notice

We may change this privacy notice from time to time, but if we change it in a way which significantly alters the terms upon which you have agreed, we will post notice of the change on our website and you will be deemed to have accepted such changes. This privacy notice was last updated March 2018.

How to contact us



Online: www.bernicia.com



Email: info@bernicia.com



Phone: 0344 800 3800



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