ADRA PRIVACY NOTICE

Who are we?

Adra (Tai) Cyf is a Registered Society under the Community Benefit Societies Act 2014, registered with charitable rules and is a Registered Social Landlord (RSL). Adra is regulated and registered with the Welsh Assembly Government. Adra will not trade for profit. As an RSL our primary purpose is to provide affordable rented housing.

This Policy shall apply to **Adra (Tai) Cyf** (the Parent) and any of its subsidiaries (including **Medra Cyf**).

We take privacy seriously

Adra as a "data controller" is committed to preserving your privacy and is committed to the protection of your personal data. This privacy notice will inform you regarding how Adra will look after your personal data and tell you about your privacy rights and how the law protects you.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

Adra complies with the Data Protection Act 2018 (DPA 2018) / UK General Data Protection Regulations in relation to personal information that you give to us and ensures that it is not misused. The Regulation defines a set of rules and guidelines we must follow when handling your information, these are referred to as the General Data Protection principles, personal information shall be:

a) processed lawfully, fairly and in a transparent manner in relation to individuals;

b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;

c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;

d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal information that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;

e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal information are processed; personal information may be stored for longer periods insofar as the personal information will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the DPA 2018 in order to safeguard the rights and freedoms of individuals;

f) processed in a manner that ensures appropriate security of the personal information, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

How we use your personal information and Information we collect from you

We will only use your personal data when the law allows us to.

We will collect information about you when you use our services, for example when applying for a property or when you become a tenant. When you contact us you may be asked to provide certain information about yourself including your name and contact details. We also collect information when you voluntarily complete customer surveys, provide feedback and participate in competitions.

Most commonly, we will use, collect and store information and personal data in the following circumstances:

Purpose of processing	Examples of data collected	UK GDPR Article 6 lawful basis	Article 9 condition (where applicable)	Data Protection Act 2018 condition / schedule (where applicable)
Assessing housing applications	Identity details, NI number, references	Art. 6(1)(b) – Contract	N/A	N/A
Managing tenancies and delivering landlord services	Contact details, tenancy agreements, correspondence	Art. 6(1)(b) – Contract	N/A	N/A
Rent collection and financial management	Rent payments, income/expenditure data	Art. 6(1)(b) – Contract Art. 6(1)(c) – Legal obligation	N/A	N/A

Repairs, maintenance, and property management	Repair requests, access notes, warning markers	Art. 6(1)(b) – Contract Art. 6(1)(c) – Legal obligation	N/A	N/A
Safeguarding health, safety, and welfare	Physical/mental health data, vulnerability markers	Art. 6(1)(c) – Legal obligation Art. 6(1)(d) – Vital interests	Art. 9(2)(b) – Social protection law Art. 9(2)(c) – Vital interests	DPA 2018 Sch. 1 Pt 1 para 1 (employment/social protection)
Supported housing service delivery	Health data, support plans, support provider details	Art. 6(1)(b) – Contract Art. 6(1)(a) – Consent (where stated)	Art. 9(2)(h) – Health or social care Art. 9(2)(a) – Explicit consent (where used)	DPA 2018 Sch. 1 Pt 1 para 2 (health or social care)
Managing anti-social behaviour	ASB allegations, investigation records	Art. 6(1)(f) – Legitimate interests Art. 6(1)(c) – Legal obligation	Art. 9(2)(g) – Substantial public interest	DPA 2018 Sch. 1 Pt 2 para 6 & 10 (statutory/public functions; preventing crime)
Preventing and detecting crime	CCTV images, reports, conviction data	Art. 6(1)(c) – Legal obligation Art. 6(1)(f) – Legitimate interests	Art. 9(2)(g) – Substantial public interest (if special category revealed incidentally)	**Criminal data:** DPA 2018 Sch. 1 Pt 2 para 10 (preventing/detecting unlawful acts)
CCTV monitoring	CCTV footage	Art. 6(1)(f) – Legitimate interests	Art. 9(2)(g) – Substantial public interest (incidental capture)	DPA 2018 Sch. 1 Pt 2 para 6
Body-worn video and lone-working recordings	Audio and visual recordings	Art. 6(1)(f) – Legitimate interests	Art. 9(2)(g) – Substantial public interest (where applicable)	DPA 2018 Sch. 1 Pt 2 para 6
Complaints handling	Complaints records, correspondence	Art. 6(1)(b) – Contract Art. 6(1)(f) – Legitimate interests	N/A	N/A
Sharing data with statutory bodies	Housing benefit, council tax, social services data	Art. 6(1)(c) – Legal obligation	Art. 9(2)(b) – Social protection law	DPA 2018 Sch. 1 Pt 1 para 1
Sharing with contractors and suppliers	Contact and access details	Art. 6(1)(b) – Contract Art. 6(1)(f) – Legitimate interests	N/A	N/A

Rental Pay (Allpay)	payment data	Art. 6(1)(b) – Contract Art. 6(1)(f) – Legitimate interests	N/A	N/A
Surveys and customer involvement	Feedback responses	Art. 6(1)(f) – Legitimate interests	N/A	N/A
Research and statistical purposes	Personal or anonymised data	Art. 6(1)(c) – Legal obligation	Art. 9(2)(j) – Research/statistics	DPA 2018 Sch. 1 Pt 1 para 4 (research)
Legal proceedings and court orders	Relevant personal/special category data	Art. 6(1)(c) – Legal obligation	Art. 9(2)(f) – Legal claims	DPA 2018 Sch. 1 Pt 2 para 6

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.

We may apply markers to your information (for example, in relation to your vulnerability, or health status, or any relevant warning notes) to enable us to tailor and deliver services to you. It is important that you notify us of any changes to your personal information.

When using the website (www.adra.co.uk) no personal information other than the IP address, web browser and device used will be recorded.

Adra may use a third party website to consult the views of customers.

How we will use the information about you

We process your personal information in accordance with the principles of the Data Protection Act 2018 (DPA 2018). 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 collect personal information about you to process applications for housing and to manage activities related to your tenancy including the provision of services to you. The information you provide to us may be shared with third parties, who act on our behalf for the purposes of providing property management and tenancy services, or for other purposes approved by you.

We will also share your information with Electricity and Gas suppliers at the commencement of tenancy in order to ensure continuity of service to you. We will also advise the appropriate Water and Sewerage Undertakers who occupy our rental properties under the Water Industry (information about Non-Owner Occupiers) (Undertakes Wholly or Mainly in Wales Regulations) 2014. We may also share your personal information with statutory bodies such as the Local Authority , relating to matters such as housing benefit, Council Tax and Social Services; and North Wales Police for the purposes of crime detection, or crime prevention.

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

Sharing your Personal Information

Access to your personal information will normally be limited to ourselves. Adra will only disclose your personal information to third parties with your consent, however we may sometimes need to share information without your consent to comply with any legal obligation or to fulfil the purposes for which it was submitted. Please see the table below for examples where and when personal information may be shared with third parties.

When sharing personal information, we will comply with all aspects of the DPA 2018. Sensitive information about health, sexual life, race, religion and criminal activity for example is subject to particularly stringent security and confidentiality measures.

Adra will not transfer your personal information outside of the UK and EU unless there is adequate protection in place, i.e. membership of the Privacy Shield Scheme.

Third party / recipient	Data shared (examples)	Reason for sharing	Lawful basis (UK GDPR Art. 6)	Article 9 / DPA 2018 condition (where applicable)
Utility providers (electricity, gas)	Name, address, tenancy start date	To ensure continuity of utility services at the start of a tenancy	Art. 6(1)(c) – Legal obligation	N/A
Water and Sewerage Undertakers	Occupier details	Compliance with Water Industry (Information about Non-Owner Occupiers) (Wales) Regulations 2014	Art. 6(1)(c) – Legal obligation	N/A
Local Authorities	Housing benefit, council tax, social services information	Administration of benefits and statutory housing functions	Art. 6(1)(c) – Legal obligation	Art. 9(2)(b) – Social protection law

Police (North Wales Police)	Relevant personal data, CCTV, ASB information	Prevention and detection of crime; crime investigation	Art. 6(1)(c) – Legal obligation Art. 6(1)(f) – Legitimate interests	DPA 2018 Sch. 1 Pt 2 para 10 (preventing/detecting unlawful acts)
Emergency services	Relevant personal and health data	Responding to emergency situations affecting tenants	Art. 6(1)(d) – Vital interests	Art. 9(2)(c) – Vital interests
Contractors and maintenance providers	Contact details, access information, safety notes	Carrying out repairs, maintenance, and safety works	Art. 6(1)(b) – Contract Art. 6(1)(f) – Legitimate interests	N/A
Mailing and communications suppliers	Name, address, correspondence details	Issuing letters, notices, and statutory communications	Art. 6(1)(b) – Contract Art. 6(1)(f) – Legitimate interests	N/A
Fire and safety services	Property and access details, safety-related information	Fire safety and statutory safety compliance	Art. 6(1)(c) – Legal obligation	N/A
Partner agencies (e.g. local authorities, police, fire service)	Relevant personal and, where necessary, health data	Fulfilment of statutory landlord and safeguarding duties	Art. 6(1)(c) – Legal obligation	Art. 9(2)(g) – Substantial public interest
Supported housing external services (with consent)	Health data, support needs	Arranging support at tenant's request	Art. 6(1)(a) – Consent	Art. 9(2)(a) – Explicit consent
Credit reference agencies	Tenancy history, rent payment data	Tenancy management, identity verification, fraud prevention, debt recovery, analytics	Art. 6(1)(f) – Legitimate interests	N/A

Courts and legal advisers	Relevant personal and special category data	Legal proceedings and compliance with court orders	Art. 6(1)(c) – Legal obligation	Art. 9(2)(f) – Legal claims
Researchers / statistical bodies	Personal or anonymised data	Research and statistical purposes	Art. 6(1)(c) – Legal obligation	Art. 9(2)(j) – Research/statistics

Supported Tenants

Tenants' personal matters will be discussed within the supported staff team and other staff involved with the welfare of the tenant, however these discussions will be in confidential settings. If a young adult asks a staff member to arrange support from an external service, they must consent to the disclosure of any personal information beforehand.

Disclosure of personal information without consent will be exceptional and only if required by law, a court order, or where overriding health and safety considerations apply.

Security and data retention

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so. We aim to ensure that staff and board members do not misuse any confidential information, or pass on this information improperly to a third party. We protect personal information by applying technical measures, implementing policies, training staff and reviewing our processes in accordance with Adra's retention policy.

Secure storage

- Paper files and records containing personal information are kept in secure cabinets. These cabinets are locked when they are not in use. Staff are provided with guidance on secure handling of records when taken from the office – for example, when carrying out a home visit.
- We ensure any information on our computer system is secure, accurate, relevant and necessary. All our computers are secured with passwords and multifactor authentication, and staff are all fully trained on our systems. The personal data held on mobile IT devices

is minimised, encrypted wherever possible and technical measures taken to secure data should a device be lost or stolen.

Telephone enquiries

When a customer contacts us by phone, they will be asked to provide a piece of identifying data (e.g. date of birth, reference number etc) to ensure that personal information is only disclosed to the correct person. If a tenant would like someone else to contact us on their behalf they need to confirm that to us directly, or if it is an ongoing arrangement, complete an access to personal information form.

Complaints

If someone contacts us to raise a complaint on your behalf we will always seek your permission first. This is because in responding to the complaint, the person claiming to represent you might view some of your personal data.

Rent enquiries

If you want to make an enquiry about your rent, e.g. your payment history or the balance of your account, we will ask you to provide your name, address and post code, your date of birth and your Rent Reference Number. Every tenant has their own unique Rent Reference Number which is listed on your regular rent statements. If you do not know your Rent Reference Number we may ask for other personal information to verify your identity before giving you any details about your rent account.

Data Retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying 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 from 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, and the applicable legal requirements.

By law we have to keep basic information about our tenants (including Contact, Identity, Financial and Transaction Data) for 6 years after they cease their tenancy agreement.

Your rights under the Data Protection Act 2018

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
  a) if you want us to establish the data's accuracy;
  b) where our use of the data is unlawful but you do not want us to erase it;
  c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
  d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide

certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Access to your information

If you wish to exercise any of the rights set out above, please contact the Data Protection Officer on the details provided below. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We want to make sure all the personal information we hold about you is accurate and up to date. You may ask us to correct or remove information you think is inaccurate.

Time limit to respond

We try to respond to all legitimate requests within one month of receiving the request. Occasionally it may take us longer than a month if your request is particularly complex, or you have made a number of requests, or if clarification of your request is needed. In this case, we will notify you and keep you updated.

Changes to our Privacy Notice

Any changes to our privacy notice in the future will be posted to the website and, where appropriate, through the tenant newsletter. For the avoidance of doubt, it should be noted that our privacy notice is not intended to and does not create any contractual or other legal rights.

How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you:

by e-mail to GDPR@adra.co.uk

Data Protection Officer

Adra, Tŷ Coch, Llys y Dderwen, Parc Menai, Bangor, Gwynedd, LL57 4BL

Complaints

A complaint can be made in the following ways:

- Filling out a complaint form – A customer can request a form from the member of staff they are dealing with or by contacting Adra on 0300 123 8084. Forms are also available at our offices and on our website www.adra.co.uk

- A customer can make a complaint over the phone by contacting our customer services team on 0300 123 8084 stating that they wish to make a complaint.

- Send an e-mail to – enquiries@adra.co.uk

- Write a letter to the Complaints Department at:
  Adra (Tai) Cyfyngedig,
  Tŷ Coch,
  Llys y Dderwen,
  Parc Menai,
  Bangor,
  Gwynedd.
  LL57 4BL

Concerns

You have the right to complain to the Information Commissioner's (ICO) Office if you think there is a problem with the way in which Adra are handling your information. To contact the ICO, please call 0303 123 1113 or visit their website at https://ico.org.uk/