

Leicestershire Rural Housing Association Privacy Notice

Who we are

Leicestershire Rural Housing Association's (LRHA) services are delivered by Midlands Rural Housing. Midlands Rural Housing is a subsidiary of emh Housing and Regeneration Limited (trading as emh), which provides specialist management services to independent rural housing associations

emh, is a registered housing provider regulated by the Regulator of Social Housing and are a functional division of emh group ltd which is the non-asset owning parent company.

Our privacy promise

We promise:

- To keep your data safe and secure
- Treat any data concerns you may have as a priority.

What is the purpose of this notice?

This privacy notice aims to give you information on how we collect and process your personal information. It makes you aware of how and why your personal information will be used, namely for the purposes of the performance of our contract with you as our customer or when you use any of our services, and how long it will usually be retained for.

It provides you with certain information that must be provided under the UK GDPR, the Data Protection Act 2018, Data Use and Access Act 2025 and any subsequent legislation.

This notice primarily covers how we use information relating to our residents but also covers non-residents using our services. It makes you aware of how and why your personal information will be used, namely for the purposes of managing your tenancy agreement, and how long we will usually keep your personal information for. In these cases, we will be the "data controller" for the purposes of data protection law.

How we use your personal data

We only collect and use personal information where we have a valid legal basis for doing so. The sections below explain what data we process, why we process it, and the legal basis that applies.

Consent

We process the following information when you give us your clear permission:

Contact information – name, date of birth, previous address, telephone numbers, email address, and supporting documents (which may include photographs of you or joint applicants). Why:

- To register your interest with emh Group
- To send you email updates you have requested
- To enable you to take part in surveys or consultations

Marketing and communication preferences. Why:

- To send you updates and information you have chosen to receive
- To include you in surveys or consultations you have opted into

Contract

We process the following information when it is necessary to enter into or perform a contract with you:

Profile details – username, password, reports you submit (e.g., repairs or anti-social behaviour), interests, preferences, feedback, and survey responses. Why:

- To register your interest with emh Group
- To enable participation in surveys or consultations

Legal obligation

We process the following information when required to comply with the law:

Contact information (as listed above). Why:

- To administer and protect our business and website, including troubleshooting, data analysis, testing, system maintenance, support, reporting, and hosting

Technical data – IP address, browser type/version, time zone settings, location, plug-ins, operating system, and device information. Why:

- To administer and protect our website and IT systems

Legitimate interests

We process the following information because it is necessary for our legitimate business purposes, and these interests are not overridden by your rights:

Contact information. Why:

- To manage our relationship with website visitors, including responding to comments, compliments, and complaints
- To administer and protect our website and business operations

Technical data. Why:

- To improve our website, marketing, user experience, and services through analytics

- To support system security and maintenance

Profile details (e.g., passwords, username). Why:

- To administer and protect our website and business
- To manage our relationship with website visitors
- To provide you access to your account

Records of correspondence. Why:

- To manage our relationship with website visitors and respond to enquiries

Marketing and communication preferences. Why:

- To manage how we communicate with you and ensure we respect your choices

What information we collect about you

We collect information when you register with us or express interest in any of the services we provide. Information about you may be passed on to us via local authority bodies as we are providing social housing / care and support.

For further information please see our general needs Privacy Notice which covers Customers and Tenants.

If you apply to work for us or you work for us the information we hold about you will have been provided by yourself, we also collect information about you from internal sources, such as your manager, and in some cases, external sources, such as referees and government agencies like the Disclosure and Barring Service.

For further information please see our **Privacy Notice for Workforce and Job Applicants**.

Special categories of personal data

"Special categories" of personal data require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information in the following circumstances:

- in limited circumstances, with your explicit written consent;
- where we need to carry out our legal obligations in field of employment/social security law;
- where there is a substantial public interest with a basis defined by the Data Protection Act 2018.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where you have already made the information public.

Examples that we collect are:

- Details of unspent convictions/criminal offences attracting a custodial sentence/on a register/person of interest

- Disability information
- Sexuality
- Ethnicity
- Religion

When using our websites we collect four main types of information from visitors:

- Feedback (general questions and specific feedback on the website)
- Requests for information
- Survey responses
- Site usage information (from session cookies and log files)

We do not pass on any personal information you have given us to any other site. The system will record your email address, and other information if volunteered to us by you, for example on the Feedback forms. This will be treated as proprietary and confidential.

The website contains links to other websites. This privacy policy applies only to sites administered by emh. You should always be aware when you are moving to another site and read the privacy statement of any site which collects personal information.

Purposes for which we use your personal information

We need all the categories of information in the list above (see what information we collect about you above) primarily to allow us to perform our contract with you and to enable us to comply with our legal obligations. In some cases, we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests.

The situations in which we will process your personal information are listed below:

- To register you as a customer.
- To communicate with you about your tenancy or support package
- To administer our waiting lists.
- To administer housing, property care and support services.
- To perform our contract or service to you.
- To manage our relationship with you, including notifying you about changes to our contract or services or asking you to provide us with feedback.
- To administer and protect the organisation and this website.
- To protect the organisation from tenancy fraud
- To comply with any legal or regulatory obligation.

- To maintain our accounts and records.
- To support and manage our employees, agents and contractors.
- As part of our marketing and promotional activities (if you agree).

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

We do not use automated decision making or profiling however there may be occasions where inadvertently we identify special category information about you.

For example, your ethnicity, religion, sexual orientation or disability may be evident from:

- Photographs
- Video footage
- Face to face meetings
- Statements you provide to us
- Declaration of Interests
- Social media.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

How is your information collected?

We collect information when you register with us or express interest in any of the services we provide. Information about you may be passed on to us via local authority bodies as we are providing social housing / care and support.

Information that you provide voluntarily

We may process and store information that you have provided voluntarily. For example, when you sign up to our newsletter we will ask you to provide your email address. It will be clear to you at this point what personal data you are providing.

Information that we obtain from third party sources

From time to time, we may obtain personal information about you from third party sources (for example data brokers), but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

Information that we collect from your activities

We collect information about how you use our website automatically through the use of cookies and other technologies. Some of these cookies can be enabled/disabled by selecting your preferences in the preference centre you are presented with when first interacting UK with this site. More information on cookies can be found under the 'Use of cookies' section below.

Public information

We may collect information about you from publicly available sources such as corporate websites and public social media accounts in order to reach out to you and promote our products and services. You can ask us to delete your information at any time.

If you apply to work for us or you work for us, the information we hold about you will have been provided by yourself, we also collect information about you from internal sources, such as your manager, and in some cases, external sources, such as referees and government agencies like the Disclosure and Barring Service. For further information please see our **Privacy Notice for Workforce and Job Applicants**.

Sharing your information

Personal information we have on you is used to make sure the services we offer continue to be the most appropriate for you.

We will use your information to manage our relationship with you, for example keeping our records up to date and to enable us to assist in the coordination of support services.

We will also use your information to carry out the contractual obligations we have to our customers for example arranging repairs, planned maintenance, surveys and inspections to the properties.

We will not normally share your information with anyone else. However, there are certain circumstances where we will be required to share your information with other organisations. We will comply with Data Protection law when disclosing this information.

Where it is required or necessary in accordance with Data Protection law, we may share information with:

- Third parties under the provisions of Crime and Disorder Act.
- Housing Benefits department.
- Collection agencies and legal representatives for the purpose of collecting rents or other monies owed to us.
- Regulatory authorities in response to formal requests.
- Repairs contractors and service providers.

- Financial organisations.
- Central government.
- Our auditors.
- Survey and research organisations.
- Other housing associations, trusts or local authorities.
Health authorities.
- Security organisations.
- Health and social welfare organisations.
- Professional advisers and consultants.
- Regulators or funders.
- Probation services.
- Police forces.
- Courts and tribunals.
- Professional bodies.
- Insurers.
- The press and the media
Or
- In response to legislative or court orders

If information is requested from a third party not covered by the above, we will seek written consent from the customer where required under Data Protection law.

How we keep information secure

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

All personal information you provide to us is stored on our secure servers within the UK. However, there may be occasions where your information may need to be stored in or sent to companies, service providers, agents, subcontractors and regulatory authorities in countries outside of the European Economic Area ('EEA') which may not have the same level of security and protection as we have under UK legislation. If we have to do this, we will make sure that suitable security measures are in place.

We have put in place procedures to deal with any suspected data security breach and will notify you and the Information Commissioner's Office of a suspected breach where we are legally required to do so

How long do we keep your information

We will keep your personal information for as long as you are a resident, service user and or employee of emh.

After you stop being a resident, service user and/or employee, we may keep your data for up to 10 years for one of these reasons:

- To respond to any questions or complaints.
- To show that we treated you fairly.
- To maintain records according to rules that applies to us.

We may keep your data for longer than 10 years if we cannot delete it for legal or regulatory reasons.

Marketing

From time to time, we would like to send you information about services of our, other members of the group, and our partner agencies where we feel this may be of interest to you.

Where you consent to receive marketing information, should you change your mind you have the right at any time to stop us using your information for marketing use by withdrawing your consent. Consent can be withdrawn by contacting us at dataprotection@emh.co.uk

Service communications

We may send you certain communications, without your consent, if we are under a legal obligation to do so; if we feel sending the communication is in both yours and our interests; and/or it would be a disadvantage to you if we didn't send you the communication.

These communications may include:

- Notifying you about changes to our terms or privacy notice

Asking you to provide feedback on our products, services and events

Access to and correction of the information we hold on you

You can find out if we hold any personal information about you by making a 'subject access request' under the GDPR.

If we do hold information about you, we will:

- Give you a description of it.

- Tell you why we are holding it;
- Tell you who it has been disclosed to; and
- Let you have a copy of the information in an intelligible form.

You may also have the right for your personal information to be transmitted electronically to other organisations in certain circumstances.

You can access your personal information we hold by writing to us at this address:

Emh, Governance, Risk & Assurance Team, Memorial House, Stenson Road, Coalville, Leicestershire, LE67 4JP.

Or by emailing us at:

dataprotection@emh.co.uk

Or call us on

0300 123 6000

You have the right to question any information we have about you that you think is wrong or incomplete.

Please contact us if you want to do this. If you do, we will take reasonable steps to check its accuracy and correct it.

If any of your personal information changes, such as a contact number or email address, please let us know right away so we can update our records.

Your rights

Under data protection law, you have rights including:

- **Your right of access**
 - You have the right to ask us for copies of your personal information.
- **Your right to rectification**
 - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure**
 - You have the right to ask us to erase your personal information in certain circumstances.
- **Your right to restriction of processing**
 - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

- **Your right to object to processing**
 - You have the right to object to the processing of your personal information in certain circumstances.
- **Your right to data portability**
 - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.
- **Your right to withdraw consent**
 - If the lawful basis for processing is consent, you have the right to withdraw that consent at any time. Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent, and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain services to you.
- **Your right to object to direct marketing**
 - Where your personal data are processed for direct marketing purposes, you have the right to object at any time to processing of your personal data for marketing, which includes profiling to the extent that it is related to such direct marketing.

You also have the right to object to and not to be subject to a decision based solely on automated processing including profiling. We do not carry out automated processing or profiling.

To exercise any of these rights, please contact the email below.

Complaints

We take any complaints we receive about the collection and use of personal information very seriously. We would encourage you to bring it to our attention if you think that our collection or use of information is unfair, misleading or inappropriate. You can make a complaint at any time by contacting us (see How to contact us below).

Under the Data Use and Access Act 2025, there has been the introduction of the **right to complain**, which means that you come to us prior to going to the ICO if you have any complaints or concerns. We will do our best to resolve this for you. However, if you think our collection or use of personal information is unfair, misleading or inappropriate or if you have concerns about the security of your personal information, you also have the right to make a complaint to the Information Commissioner's Office.

You can contact the Information Commissioner's Office at the following address:

Information Commissioner's Office, Wycliffe House,
Water Lane,
Wilmslow,
Cheshire,
SK9 5AF

How to contact us

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

You can do so via one of the contact details below:

- Email: dataprotection@emh.co.uk
- Post: Governance, Risk & Assurance Team, Memorial House, Stenson Road, Coalville, Leicestershire, LE67 4JP.
- Telephone: [0300 123 6000](tel:03001236000)

We have appointed a Data Protection Officer to oversee our compliance in line with Data Protection legislation. Please contact our Data Protection Officer using the details above.

Privacy Notice updates

Our Privacy Notice will be regularly reviewed, and it may change at any time in the future, we encourage you to check this Privacy Notice whenever you visit our website.