

# Privacy Notice — Our Customers

## How your information will be used

1. As your landlord, ateb, we will need to keep and process information about you to ensure that we can deliver services to you in line with your tenancy agreement. The information we will hold, and process will be used for our management and administrative use only. We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully, and appropriately, during the time you have a tenancy with us and for a period of time once your tenancy ends. If you do not provide this data, we may be unable in some circumstances to comply with our obligations.
2. This notice also applies to contractors and other organisations that we rely on to provide a service to you on our behalf.
3. As a Group, we may sometimes need to process your data to pursue our legitimate business interests, for example to prevent fraud, administrative purposes or reporting potential crimes. The nature of our legitimate interests is:
  - a. *Ensuring the requirements of your tenancy agreement are met*
  - b. *Compliance with a legal obligation e.g., providing information to the HMRC/ Department of Work and Pensions/Police*
  - c. *Compliance with Welsh Government regulatory requirements*
  - d. *Ensuring your health, safety, and wellbeing*
  - e. *Providing operational and management information*
  - f. *Establishing, exercising, or defending legal claims*
  - g. *Protecting the vital interest of you i.e., providing personal or sensitive personal data to emergency services in the event of an accident or incident*
  - h. *Safeguarding of vulnerable adults and children*
  - i. *Prevention and detection of fraud or crime*
  - j. *Promotion of our services and activities*

We will never process your data where these interests are overridden by your own.

4. Much of the information we hold will have been provided by you, but in some instances may come from other sources, such as the Local Authority, Health Services or Police
5. The sort of information we hold includes:
  - a. housing application (including references and further information supporting your application e.g., Occupational Health Assessments, proof of ID)

- b. your tenancy agreement and information required by us to manage it for example contact details, information about other household members and any special requirements or support needs you may have that we need to know to manage the agreement with you effectively
  - c. correspondence with or about you, for example letters to you about a change in your rent or entitlement to welfare benefits
  - d. contact and emergency contact information
  - e. records of services we provide you e.g., repairs and rent statements
  - f. information needed for equal opportunities monitoring
  - g. CCTV images of you which may be captured on our CCTV systems
  - h. recordings of phone calls to our offices (making and receiving)
  - i. records relating to reports of anti-social behaviour and criminal convictions, or any abusive behaviour reported by ateb staff, contractors, and others
  - j. referrals made to other agencies where support and expert advice may be required
  - k. records of external meetings we may attend in our capacity as your landlord and where applicable support provider
  - l. we may install systems in properties that monitor the performance of the property e.g., energy use, air quality. The information gathered and reported will relate to the performance of the property only and does not involve the processing of personal data
  
- 6. Where we process special categories of information relating to your racial or ethnic origin, religious beliefs, or sexual orientation, we will always obtain your explicit consent to those activities unless this is required by law. Where we are processing data based on your consent, you have the right to withdraw that consent at any time.
  
- 7. We will only disclose information about you to third parties in the following circumstances:
  - a. If we are legally obliged to do so; e.g. to prevent crime and disorder or to comply with regulation.
  - b. To protect you or your family's vital interests.
  - c. To comply with our contractual duties to you, e.g. we may need to pass on certain information to our maintenance contractors so that a repair can be completed.
  - d. When your tenancy begins or ends, if you fail to inform utility companies (gas, electric, water) of your occupation or the ending of your tenancy, we will share with a utility company upon receiving a demand for payment, your tenancy agreement as proof of your occupation, your name and your occupation dates, to ensure that bills are accurately calculated.
  
- 8. We may transfer information about you to other Group companies for purposes connected with your tenancy.
  
- 9. In limited and necessary circumstances, your information may be transferred outside of the UK to the European Economic Area (EEA) or to an international organisation to comply with our legal or contractual requirements. We have in place safeguards

including door security systems for authorised access and internal firewall systems for external access into housing systems.

10. There are a number of things that affect how long we may store your personal data for, and we may operate different retention periods depending on the type of data we hold. Full details can be found in our Retention Schedule attached to our Data Protection Policy that can be found on the website and is available on request.
11. If in the future, we intend to process your personal data for a purpose other than that which it was collected we will provide you with information on that purpose and any other relevant information.
12. If we make a significant change to this privacy notice we will take reasonable steps to inform you of this change.

## **Your rights**

13. Under the General Data Protection Regulation (GDPR UK) and The Data Protection Act 2018 (DPA) you have several rights with regard to your personal data. You have the right to request from us access to and rectification or erasure of your personal data, the right to restrict processing, object to processing as well as in certain circumstances the right to data portability.
14. Unless exceptional circumstances apply any subject access and data requests will be provided electronically. We reserve the right to charge an administrative fee for providing hard copies. Identification will also be requested as a security measure to confirm your identity.
15. If you have provided consent for the processing of your data, you have the right (in certain circumstances) to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn.
16. You have the right to lodge a complaint to the Information Commissioners' Office if you believe that we have not complied with the requirements of data protection law regarding your personal data.

## **Identity and contact details of controller and data protection officer**

17. ateb Group Limited is the controller and processor (please see point 7 for additional data processors) of data for the purposes of data protection law.
18. If you have any concerns as to how your data is processed, you can contact:

Ceri Morgan  
Meyler House  
St Thomas' Green  
Haverfordwest  
SA61 1QP

01437 763 688  
[mydata@atebgroup.co.uk](mailto:mydata@atebgroup.co.uk)  
[www.atebgroup.co.uk](http://www.atebgroup.co.uk)

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