



## Customer Privacy Notice

### Personal information

Flagship Housing Group Limited is committed to the responsible handling and protection of personal information.

The General Data Protection Regulation (GDPR) defines personal data as any information related to a person that can be used to directly or indirectly identify them. This includes physical attributes, location data, online identifiers (including IP addresses), identification numbers, health information and economic, cultural or social identify of a person.

We process (collect, use, store, share) personal information where necessary to provide our services and for our operational and business purposes as described in this Privacy Notice.

We want to be clear about our privacy practices so that you can make informed choices about the use of your information, and we encourage you to [contact us](#) at any time with questions or concerns.

### How we use your information

This privacy notice tells you how we, Flagship Housing Group Limited, will collect and use your personal information to enable us to provide affordable housing, shared ownership, private lettings, student and direct sale accommodation and associated services.

### Why does Flagship Group need to collect and store personal information?

Flagship processes personal information for the following purposes:

- Management and support of Tenancies, Shared Ownership and Direct Sales
- For the welfare of our customers
- Maintenance of properties including private garages, communal areas and sewerage works
- For the protection of employees, customers, contractors and sub-contractors
- Servicing, repair and installation of gas appliances and heating systems
- For the prevention of fraud, crime, legal proceedings and to comply with the law.
- Feedback from research and surveys on how we can provide better services
- Communication with our customers to provide updates relating to our business and services
- For the management, wellbeing and support of our employees
- For the management of financial services
- Security and maintenance of our networks and systems
- For general day to day corporate operations and due diligence

We are committed to ensuring that the information we collect, and use is appropriate for these purposes and does not constitute an invasion of your privacy.



## Special category information

Occasionally we collect and process what may be considered special category information (sensitive personal information).

Sensitive personal information is a subset of personal information and is generally defined as any information related to racial/ethnic origin, political opinions, religious beliefs, trade union membership, physical or mental health, other medical information including biometric and genetic data, or sexual life preferences.

We will only collect this information if it is necessary to support you whilst you are a Flagship customer.

We will only share this information if we receive your explicit consent to do so, unless for reasons of vital interest (emergency, life or death situation) or required by law.

## Lawful processing

We must have a valid lawful basis to process your personal information. This ensures that the processing is necessary for the purpose we collected it for.

We process (collect, use, store, share) your personal information for the following lawful basis:

**Performance of a contract** – where the processing is necessary for Flagship to deliver our side of the contract (by this we mean your tenancy, lease agreement, Shared Ownership or Direct Sale) to you as an individual. This includes the following processing activities:

- Process information regarding you and your household including: Full name, DOB, sex, age, health related issues, disabilities and vulnerabilities, communication needs, next of kin, correspondence address, NI number, Anti-social behaviour (ASB) Records, legal and court proceedings.
- Process information regarding your economic status including: Payment methods, housing benefit and universal credit, rental history, bank account details, direct debit details.
- Process information regarding customer welfare including: Support worker, case worker, doctor's letters, hospital letters, referral letters, Citizens Advice Bureau correspondence
- Process diversity information including nationality, sexual orientation, first language, ethnic origin and religion
- Process tenancy information including: Tenancy and tenure type, succession of a tenancy, assignment of a tenancy, forwarding address, previous address, alternative contact such as Executors, Advocates and Tenancy enforcement
- Process of application and or leading to a sale or tenancy including: Right to Buy or Acquire, Shared Ownership, Direct sales, remortgages, leasehold and mutual exchange
- Share rental account information with relevant authority such as housing benefit claims, Universal credit, tenancy at risk information and mutual exchange
- Process information for the maintenance of properties, including private garages, communal areas, sewerage works, gas boilers and smart meters. This includes: Logging of and sharing of customer contact details with internal tradespeople and operatives from RFT and Gasway, external contractors, sub-contractors and suppliers



- Payment management including Housing Benefit and Universal Credit schedules
- Processing of credit and debit cards and sharing necessary information with third party and Bank including automated services
- Processing of Direct Debits and sharing necessary information with Bank
- Processing of communication with Flagship Group including calls into response (voice recordings), notes of discussions with the organisation, emails, texts and processing of internal and external email
- Processing of postal mail by a third-party organization
- Use a tracing company to locate you if you have left a Flagship property in debt
- Processing of application and administration for Hope Assist (Hopestead) Assistance with Rent Arrears

**Legitimate interest** – We process personal information for certain legitimate interests related to the business purposes listed above. “Legitimate Interest” means in the interest of our company in conducting and managing your tenancy with us.

- Advise by phone, post, text or email if your payment is late or there are rent arrears on your account
- Advise by smart meter dashboard if your account is going into rent arrears (properties with switchee smart meter only)
- Processing of ‘do not visit alone’ (DNVA) information to protect members of staff
- CCTV surveillance for the protection of property and staff
- Processing of complaints made by the Ombudsman, MP’s, Councillors and negative feedback from our customer system Orbis Insight.
- Administration and processing of Affordability Checker for Shared Ownership properties
- Share forwarding address to utility company if outstanding balance on accounts
- Text or email you to complete feedback surveys after you have received a service from us and use information you provide to improve our services
- Carrying our research to benefit us as a landlord and you as a customer, such as social and affordability surveys to influence decision making on rent levels
- Statistical analyses of data to improve performance of income collection
- Email or text customers with the promotion of our services such as the Flagship Platform
- Store (3 months) voice recordings when you call into Flagship Response, RFT repairs and L&R Team, for complaints resolution, training and quality purposes.
- Email, text or post an invitation to drop-in sessions to influence improvement in specific areas.
- Share name, address and meter reading with Green Energy UK when you sign-up for a tenancy with us.
- Share personal information, lawfully and as necessary in association with a national or global disaster such as the coronavirus.

**Legal Obligation** – We process personal information for certain legal obligations. This is where the processing is necessary to comply with legislation or the law.

- Share personal information with the police for the prevention and detection of crime (case specific and relevant)



- Whistleblowing for the protection of staff
- Share personal information with the relevant local authority for the prevention and detection of crime (case specific and relevant)
- Share personal information with the local safeguarding children's board Children's Act 2004.
- Share personal information with the local safeguarding board for the protection of adults Care Act 2014.
- Progression of Arrears such as the serving of a Notice to Quit
- Share personal information with the County Court and High Court for non-payment of rent
- Share personal information with Barristers and Solicitors
- Sharing CCTV images for insurance and legal purpose
- Assessing and pursuing incidents of identified or suspected fraud and reporting matters of concern to the relevant authority
- Investigating and reporting of Data Breaches in line with the General Data Protection Regulation (GDPR)
- Processing of Subject Access Requests (request for personal information we hold about you) in line with GDPR
- Processing of individual rights in line with (GDPR)
- Website security such as the maintenance of the customer portal
- Administration of court services
- Overall information security and maintenance operations to prevent unauthorized access, intrusion, misuse of company systems, networks including prevention of personal data breaches and cyber-attacks (An authorised third-party organization may view personal information as part of this)

**Consent** - We process personal information at your request and where you have a choice to do so.

- **Administration of LiveChat** – You have a choice whether to communicate with us in this way by using LiveChat on Flagship Group website. We use an internal platform called, Enghouse to handle customer enquiries in real time. If you use the LiveChat service, we will collect your name and the contents of your LiveChat session. This information is retained on Flagship encrypted servers within our own network. Flagship store Live Chat information for 1 month after which it is deleted.
- **Processing of information for The Platform** – As a Flagship customer, you have a choice whether you would like to take part in surveys, interactive tasks and online discussions by signing up to The Platform. The Platform gives you the chance to get involved and help us improve the service we provide. The Platform is a WordPress blogging service hosted by Microsoft. The Microsoft privacy notice is viewable on sign up.
- **Assistance with switching energy suppliers** – As a Flagship customer we can introduce you to Energy Angels who will offer support and assistance if you wish to change your energy supplier.
- **Improve customer experience** – As a Flagship customer we may contact you for your assistance with improving our services. If you agree we will introduce you to an external organisation (Collaborative Change in association with Acumen Fieldwork) who will ask you about how Flagship communicate with you when you are having trouble in paying your rent.



- **Budget Planner (calculation)** – Our budget calculator is a useful tool that can give you an idea of your financial position when applying for a Flagship home. The calculator is used only as an indicator of affordability for you and our housing team. Data is stored on Flagship systems until 10 days after the property is let, after which all data will be deleted.
- **Your own Place** – As a Flagship customer we can introduce you to, Your Own Place, providing Independent Living Skills or other training provisions provided by Hopestead.

**Vital Interest** – We process personal information where it is in the vital interest of Flagship Group customers.

- In an emergency where the individual is incapable of giving consent, we will share medical or next of kin details with paramedics or other medical providers.
- Any national or global disaster that may change the way we work, such as the Coronavirus.

**Public Interest** – We process personal information as part of the National Fraud Initiative (NFI). This is a national exercise run by the Cabinet Office every two years. Data is matched to enable potentially fraudulent claims and payments to be identified. If a fraudulent match is discovered an investigation will take place which may result in the prosecution of the individual.

For more information please refer to Gov.UK privacy notice on Flagship Group website or visit, (<https://www.gov.uk/government/publications/code-of-data-matching-practice-for-national-fraud-initiative>)

## **Will Flagship Group share my personal information with anyone else?**

We may pass your personal information on to third-party service providers contracted to Flagship Group during dealing with you. Any third parties that we may share your information with are obliged to keep your details securely, and to use them only to fulfil the services they provide on our behalf. When they no longer need your information to fulfil this service, they will dispose of the details in line with Flagship Group procedures. If we wish to pass your sensitive personal information onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

## **Special circumstances**

To provide a duty of care to employees, customers, contractors and sub-contractors we will process and share relevant personal information for their protection. This will be an alert on our management system to visit in pairs (DNVA).

## **How will Flagship Group use the personal information it collects about me?**

Flagship Group will process the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. Flagship Group is required to retain information in accordance with the law, such as information needed for financial, legal and audit purposes. How long certain kinds of personal information should be kept may also be governed by



specific business-sector requirements and agreed practices. Personal information may be held in addition to these periods depending on individual business needs.

### **Under what circumstances will Flagship Group contact me?**

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. We may sometimes contact you for feedback by doing research or asking you to take part in a survey, this enables us to make changes and improvements to our services. We may also communicate with you when we have updates or changes to our business. If you have provided us your email and or mobile number, we will contact you in this way to communicate.

We consider this communication to be within our legitimate interest of lawful processing.

### **How do we secure personal information?**

Flagship Group takes data security seriously, and we use appropriate technologies and procedures to protect personal information. Our information security policies and procedures are closely aligned with widely accepted standards and are reviewed regularly and updated as necessary to meet our business needs, changes in technology, and regulatory requirements.

For example:

#### **Policies and procedures**

We have measures in place to protect against accidental loss and unauthorized access, use, destruction, or disclosure of data including the following:

- We have a Business Continuity and Disaster Recovery strategy that is designed to safeguard the continuity of our service to our customers and to protect our people and assets
- We place appropriate restrictions on access to personal information
- We implement appropriate measures and controls, including monitoring and physical measures, to store and transfer data securely
- We conduct Privacy Impact Assessments in accordance with legal requirements and our business policies
- We conduct Data Protection training for all employees who have access to personal information and other sensitive data
- We take steps to ensure that our employees and contractors operate in accordance with our information security policies and procedures and any applicable contractual conditions

### **Your rights as a data subject (Customers of Flagship Group)**

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- **Right of Access** – at your request we will provide you with a copy of the personal data we hold about you. This is referred to as your right of access (subject access request). You are entitled to receive any information that identifies you as an individual.



- **Right of rectification** – you have a right to ask us to update personal information if you have a reason to believe that it is inaccurate or incomplete.
- **Right to be forgotten** – you have the right in certain circumstances to ask for the data we hold about you to be erased from our records. Especially if you think we are processing your personal information where it is no longer necessary or where you believe it is unlawful.
- **Right to restriction of processing** – You have the right to ask us to temporarily stop processing your personal information if you have concerns over the accuracy of the information in some way.
- **Right of portability** – you have the right to have the data we hold about you transferred to another organisation.
- **Right to object** – you have the right to object to the way we process your personal information if you consider Flagship are being unlawful.
- **Right to object to automated decision making, including profiling** – you have the right to object to decisions made about you from automated processing/profiling. Flagship Group use an affordability checker for customers applying for Shared Ownership properties. The result of the calculation made will determine whether Flagship will be able to offer you a Shared Ownership property. Automated profiling is used as part of the National Fraud Initiative every two years. For further information see (Public Interest, page 4 of this document).

### **Continuous Recording of Social Housing Lettings and Sales (CORE)**

Information gathered by the Ministry of Housing, Communities & Local Government

If your household has entered a new social housing tenancy after 1989, social housing providers such as Flagship will have shared data for research and statistical purposes. The Ministry of Housing has asked social landlords to make their privacy notice available to our customers. This will be enclosed with your Tenancy Agreement.

### **Privacy Notice changes**

We will regularly review and make necessary changes to the services and information handling processes when you, the law or the Information Commissioners Office (ICO) request such changes.

We process (collect, use, store, share) personal information where necessary to provide our services and for our operational and business purposes as described in this and future Privacy Notices.

**This privacy notice was last undated on 01.10.2020**

### **How to contact us?**

If you would like to make a request to obtain personal information we hold about you or access any of your rights as explained in this privacy notice you can do so by filling in a quick and easy form on the Flagship website under Terms and Conditions.





Alternatively feel free to contact us in the following ways:

**Call us**

Response – our Contact Centre is open from 7am – 7pm Monday to Friday. Call Freephone 0808 168 4555

**Write to us**

Data Protection Officer  
Flagship Housing Group Limited  
31 King Street  
Norwich  
NR1 1PD

**Email** – Data Protection Officer

***DataProtectionTeam@flagship-group.co.uk***

**Lodge a complaint with the supervisory authority**

If you have any concerns regarding how Flagship Group handled your request, you have the right to complain to the Information Commissioner's Office (ICO) details below:

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