



Privacy Notice - How we use your personal information

Who are we

emh group is a non-asset owning parent company, with two largely ring-fenced functional divisions: emh Housing and Regeneration Limited, trading as emh, which is a Registered Provider regulated by the Regulator of Social Housing and emh Care and Support whose regulated activities fall within the remit of the Care Quality Commission.

Our Privacy Promise

We promise:

- To keep your data safe and secure
- Treat any data concerns you may have as 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 on your journey with us. 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. It provides you with certain information that must be provided under the UK General Data Protection Regulation ('the UK GDPR'), the Data Protection Act 2018 and any subsequent legislation.

This notice primarily covers how we use information relating to our residents, website visitors and people who interact with or do business with us by using our website. In these cases, we will be the "data controller" for the purposes of data protection law.

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 a partner registered social landlord. For further information please see our general needs Privacy Notice which covers Customers and Tenants.

If you apply to purchase one of our properties, we will ask you to complete an online application form on our sales.emh.co.uk website. The given information will be used to form part of the sale contract, should you proceed. If you proceed with the sale and the sale completes, your given information will be stored on our MRI system for the life of your tenancy / lease with us in line with our Retention Policy.

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 job applicants and employees](#).



Our legal basis for processing personal data relating to most website visitors is that providing an effective online presence is in our **legitimate interests** as an organisation. If you are ordering or receiving goods or services online, the use of your data is **necessary for the performance of our contract** with you.

What information we collect about you

What information we collect, why we collect it, the legal basis for doing so, and how long for:			
What	Why	Basis	Retention
Application Form containing: <ul style="list-style-type: none"> Name Date of birth Previous address Telephone numbers Email address Financial information HE Calculator 	Your lease is a contract between you, any other person in your household (should you hold a joint lease) and EMH Homes This data is used to set up and maintain your rent account with us.	B	Life of lease + 6 years
<ul style="list-style-type: none"> Mortgage Offer Completion Statement 	Proof of lender for us to contact if we need to for capitalisation, forfeiture or if they repossess	F	life of Lease + 6 years
<ul style="list-style-type: none"> LPE1 	We need to have evidence of what information we have supplied to a solicitor as landlord regarding management of the property	F	Life of lease + 6 years

Types of Legal Basis					
A – Consent	B – Contract	C – Legal obligation	D – Vital interests	E – Public task	F – Legitimate interest

What particularly sensitive information we collect about you

What information we collect, why we collect it, the legal basis for doing so, and how long for:			
What	Why	Basis	Retention
Details of unspent convictions/ criminal offences attracting a custodial sentence/on a register/person of interest	We use unspent conviction information to house you appropriately.	F	Life of tenancy but regularly reviewed. If no issues when conviction spent data will be deleted after 1



			year following suspension
Disability information	As required by our regulator, in accordance with our legal obligations under the Equality Act 2010 and to provide information on extra services we provide – such as tenancy support.	B	Life of tenancy but regularly reviewed
<ul style="list-style-type: none"> • Ethnicity • Religion • Sexuality • Nationality 	For analysis purposes, as required by our regulator and to provide information on extra services we provide.	B	Destroyed after data is recorded

Types of Legal Basis (Special Category Data)					
A – Consent	B – Social protection law obligation	C – Vital interests	D – In the public domain	E – For legal claims	F – Public interest

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 information will also be used to form part of the sale contract, should you proceed.

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.

Marketing (E-updates – new properties)

If you choose to subscribe to email alerts we will collect and store only the information you have given us regarding your email preferences. We use a service called Mail Chimp, which is an email address management and message sending service. Your data is stored by us via their services and will not be passed to any other party.



Mail Chimp enables us to send marketing emails. Mail Chimp has a certified agreement to the EU/US and Swiss Safe Harbor Frameworks. The Safe Harbor Frameworks have now been replaced by the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework and retains a certified agreement with these Privacy Shield Frameworks. See Mail Chimp Privacy Policy for more details.

From time to time we would like to send you information about services of ours and other members of the group we feel may be of interest to you.

Despite your consent to receive marketing information, should you change your mind you have the right, at anytime, to stop us using your information for marketing use by withdrawing your consent. Consent can be withdrawn by contacting us **(see How To Contact Us below)**

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 surveys and inspections to the properties. We do not use automated decision making or profiling.

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:

- Compliance with law- we will, where we are legally required to do so (for example to the Inland Revenue, Benefits Agency, any court of competent jurisdiction or any law enforcement agency with statutory authority).
- Surveys -We may need to pass on your information to the RICS accredited surveyor in order to carry out a valuation on your property either for mortgage purposes or if you have requested to staircase your property.
- Viewings – If you wish to view a property through us we will need your contact details and address for security purposes.
- Reservations - We will offer the option for all buyers to undergo a qualification with one of our recommended Mortgage advisers as part of the reservation process.
- If Selling - we will need to pass on your contact details to the company that completes our Energy Performance Certificates (epc's) and possibly to estate agents for chain details



How do 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 we keep your information

We will keep your personal information for as long as you are a tenant, service user and or employee of emh group. After you stop being a tenant, 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.

Changes to privacy policy

We may edit this policy from time to time. If we make any substantial changes, we will notify you by posting a prominent announcement on our web pages. This website and its contents are protected by copyright. The content provided on this website is for general information only.

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 our Data Protection Advisor at this address: Emh, Governance & Assurance Team, Memorial House, Stenson Road, Coalville, and Leicestershire, LE67 4JP or by email on dataprotection@emh.co.uk

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.

Your rights

You may also have the right, in certain circumstances, to request that we delete your personal information, to block any further processing of your personal information or to object to the processing of your personal information.

There are some specific circumstances where these rights do not apply and we can refuse to deal with your request.

If we are processing your personal information based upon your consent (e.g., as part of our marketing or promotional activities or to make a voluntary referral to an external agency), you have the right to withdraw your consent at any time.

If you require any further information about your right to rectification, erasure, restriction of or object to processing or you wish to withdraw your consent please contact us (**see How to contact us 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**).

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 & Assurance Team, Memorial House, Stenson Road, Coalville, Leicestershire, LE67 4JP.
- Telephone - 01530276000

We have appointed a Data Protection Advisor to oversee our compliance in line with Data Protection legislation. Our Data Protection Advisor is Hannah Adams. If you have any questions about this privacy notice or how we handle your personal information, please contact our Data Protection Advisor using the details above.

Our Data Protection Officer who is registered with the Information Commissioner's Office is Lucie Westbury, Head of Governance and Assurance. Please contact our Data Protection Officer using the details above.

Cookies

Our website uses cookies. By using our website, you agree to this privacy statement and you consent to our use of cookies in accordance with the terms of this statement.

What are cookies?

A cookie is a small file placed on your computer hard drive that helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

There are two main kinds of cookies: session cookies and persistent cookies. Session cookies only last for the duration of your visit to the website and are deleted from your computer when you close the browser. Persistent cookies outlast user sessions and remain stored on your computer until deleted or until they reach their expiry date.

Most browsers allow you to reject all cookies, while some browsers allow you to reject just third-party cookies.

Why we use cookies

Cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not.

Cookies are specific to the server that created them and cannot be accessed by other servers, which means they cannot be used to track your movements around the web. Although they can be used to store information which may identify a computer, they cannot be used to identify you personally.

Ways we use cookies include:



- Recognising your device so you do not have to give the same information several times during one task
- Recognising that you may already have given a username and password so you do not need to do it for every web page requested
- Measuring how many people are using services so they can be made easier to use and there is enough capacity to ensure they are fast
- Our customer account service MyHomeOnline uses cookies to remember your font size preferences and help us identify that you are the only person accessing your account

Google Analytics

We use Google Analytics to analyse the use of this website. Google Analytics generates statistical and other information about website use by means of cookies. The information generated relating to our website is used to create reports about its use which we can use to improve the site.

Cookies do not contain any information that personally identifies you. A cookie in no way gives us access to your computer or any information about you.

You can learn more about these small files and how to manage them yourself on www.aboutcookies.org