

Privacy Notice – *How we use your personal information to process comments, compliments and complaints*

Who are we

emh Housing and Regeneration Limited, trading under the name emh homes, is a registered housing provider regulated by the Regulator of Social Housing. emh homes are a functional division of emh group 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 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 to deal with your comments, compliments or complaints. We process the information you provide us with to investigate your complaint, comments and record your compliments. This notice provides you with certain information that must be provided under the General Data Protection Regulation (EU) 2016/679 ('the GDPR'), the Data Protection Act 2018 and any subsequent legislation.

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
<ul style="list-style-type: none"> • Name • Address • Phone number • Email address • Nature of the complaint • Nature of the compliment • Nature of the comment • Supporting documents that may also contain photographs of you and others 	So we can investigate and respond to your comment, compliment or complaint.	F	We keep all records relating to comments, compliments and complaints for six years from when we resolve your complaint. If you refer your complaint to

					the Housing Ombudsman, we will keep details for ten years from when we resolve your complaint.
Types of Legal Basis (Personal Data)					
A – Consent	B – Contract	C – Legal obligation	D – Vital interests	E – Public task	F – Legitimate interest

If your complaint relates to a service that someone else has received, we will contact them separately for consent if it is appropriate to do so.

Purposes for which we use your personal information

Emh homes will use the information you provide us with:

- To carry out investigations into your complaint
- To record your comments/ compliments
- To provide a response and agree appropriate actions
- To learn from the experience, this may inform changes to policies and or processes

How we use your information

Data Protection law says that we are allowed to use personal information only if we have a proper reason to do so. The law says we must have one or more of these reasons:

- To fulfil a contract we have with you, or
- When it is our legal duty, or
- When it is in our legitimate interest, or
- When you consent to it

We collect information about you based on a legitimate interest to administer and investigate your comment, compliment and complaint and to improve the provision of services we provide.

Complaints which are received by our Customer Services Team will either be dealt with by the Customer Experience Team or, if necessary, sent to a member of staff within the relevant service area for investigation.

Some complaints may be received directly by the relevant service area and will be dealt with directly by them. That service may then contact you for further information. We will never sell your information.

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

Sharing your information

When a complaint is escalated beyond stage 1, we may share your information with:

- Investigating Officers
- Independent Persons who sit on our complaints panels
- Statutory Bodies such as the Housing Ombudsman

We do not share information about individuals without consent unless the law and our policies allow us to do so. We share information securely. Anyone who receives information from us is legally required to keep it confidential.

How do we keep information secure

We have 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, 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.

Right of 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 data protection laws. 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 understandable format

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 group, Quality standards Team, Memorial House, Stenson Road, Coalville, and Leicestershire, LE67 4JP or via email on dataprotection@emhgroup.org.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.

We need to hold accurate and up to date information about you so that we can deliver appropriate services. If any of your details change, you need to tell us as soon as possible so that we can update your records.

Right to be forgotten

You 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 notice or the information we hold about you. You can do so via one of the contact details below;

- Email dataprotection@emhgroup.org.uk
- Post - Quality & Standards Team, Memorial House, Stenson Road, Coalville, Leicestershire, LE67 4JP.
- Telephone - 01530276000

We have appointed a Data Protection Officer to oversee our compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact our Data Protection Officer using the details above.