



## **CUSTOMER PRIVACY NOTICE**

Magenta Living is a Housing Association registered with the Information Commissioners Officer as a Data Controller.

Our ICO registration number is **Z913730**

### **Address:**

Partnership Building  
Hamilton Street  
Birkenhead  
CH41 5AA

Magenta Living is committed to protecting and respecting your privacy. We believe it is extremely important to keep any personal information we have about our customers secure and confidential.

Legislation applies to Magenta Living's use of anyone's personal information and everyone has rights regarding how their personal information is handled. Magenta Living adheres to the Data Protection Act 2018.

As the Data Controller, Magenta Living controls the way your personal data is collected and the purpose for which your personal data is used.

### **We have published this statement to tell you:**

- How we store your personal information
- What we use your personal information for
- What information we may collect about you
- Who (if anyone) we pass it on to and how they use it
- Your rights

### **How we store your personal information**

This Privacy Notice tells you what to expect when Magenta Living collects and stores personal and sensitive personal information. It applies to information we collect about tenants, service users, leaseholders, contractors and suppliers.

If we can store your personal information solely on computers we will, however there may be cases where we have paper copies instead of or as well. It is held securely and we have security measures in place to protect it. Further information on why we collect information and how we store it can be found in the sections below.

Magenta Living's computer data centre is held at our head office, Partnership Building. Where we use computers (including those owned or managed by our suppliers) outside of our offices, they are secure and protected.

### **What we use your personal information for:**

### **a) Tenants, service users and leaseholders**

During your tenancy we may collect and process information about you and members of your household. The lawful basis for this processing in *most cases is contractual*. We do this to:

- Manage your tenancy and the Magenta Living property you live in
- Monitor compliance with the terms of your tenancy or service agreements
- Deliver support for special needs to you or a member of your household
- Conduct surveys in order to monitor and improve services
- Monitor equality and diversity (the information provided is anonymised and used only for statistical monitoring purposes) which helps us make improvements
- Provide information about our performance and services
- Provide information about additional services we offer, including opportunities to get involved, training and events
- Processing and responding to complaints and enquiries, MP and Councillor enquires, tenant representative enquiries (with written permission) and data subject access enquiries

Personal information is stored on our computer systems and/or a physical file.

Unless we advise you otherwise we will only collect and process personal information to carry out these functions. Where we collect data for other specific purposes, we will inform you of the purpose, legal basis for processing and explain how the data may be shared.

### **b) Contractors and suppliers**

We will collect relevant information from you in accordance with our contracts or information sharing agreements. This may include names and qualification information relating to your staff. The purpose is to enable you to provide services to our tenants on behalf of Magenta Living.

Information will be held centrally by our Procurement Team on our computer system and by the relevant team/department where necessary.

### **c) Fraud detection**

We may use data disclosed to us for the purpose of preventing and detecting fraud. The lawful basis for this processing in *most cases is legitimate interest or public interest*.

Any personal data disclosed may be used for the purpose of preventing and detecting fraud. This includes information provided on the Magenta Living website, on the Customer Portal (MyMagenta) area, or in any other way provided to us online or not.

The data collected may be used for the purpose of data matching and for further investigations. This involves comparing the data we hold on you with that held by third parties solely for the purpose of detecting and preventing fraud. We might also

use your data to further investigate fraud that we think might have been committed.

This involves checking with various third parties, such as the Land Registry, banks, schools and utility companies.

### **Information we may collect from you**

We may collect the following personal information about you when you first come to us. The type of information we collect from you depends on our relationship with you. We have different data for people who rent homes from us than those who use our community investment services.

We collect information about you when you make an application with us or a referral is made by you for one of our services. We also collect information when you voluntarily complete customer surveys, provide feedback or through general correspondence. Further information may be collected during the course of a tenancy, for example, photographs of properties when assessing repairs requests or if your personal circumstances change.

The lawful basis for this processing in most cases is contractual and can include:-

- Your name, address and contact details for use across Magenta Living and by our suppliers and partners
- Medical information & emergency contact details, next of kin, information about any accidents or incidents which involve you or your home.
- Financial information including any credit checks, income details, bank details, housing benefit information & guarantor details.
- References received about you (e.g. from your employer or previous landlord)
- Details about your home when you apply for shared ownership
- Information regarding your marketing preferences

For Housing Management purposes:

- Your housing needs, so we can ensure your home is suitable for you
- Your bank details and Direct Debit information for payment of rent or service charges (*NB - if you pay us using your credit and debit card, we do not store the details, and we only exchange this information with the card holder*)
- Benefit and council tax information, to verify your circumstances
- Details relating to the repair and maintenance of your home
- Information that you provide to your usual Magenta Living contact
- Feedback from our contractors about their appointments with you
- Voice and video recordings for safety, crime reduction and quality management

For the purpose of equal opportunities monitoring, and only with your explicit consent, we may also collect information about the following:

- Ethnicity
- Gender
- Sexual orientation
- Disabilities
- Religion

If we become aware of a risk to our staff, contractors or other residents, or there is an issue that may affect the delivery of services, we may place a note detailing the risk on your records. When we do so, we will inform you and ensure that these flags are regularly reviewed.

### **Our Legitimate Interests**

Certain information is processed as it is deemed to be in Magenta's business or commercial interests. When we rely on any legitimate interest, we will ensure that we take a balanced approach and have appropriate safeguards in line with your expectations. If we rely on any legitimate interest, we will tell you what that is.

Our legitimate interests include:

- Having appropriate security, for our offices and our sites including CCTV.
- Handling and investigating complaints, accidents or incidents and preventing reoccurrences.
- Keeping our records up to date.
- Collecting unpaid debt.
- To help us plan and improve services we provide, personalise our customers services and meet our tenants needs.
- Official communications.
- To ensure fair and equal access for all to our services.
- Recording threatening behaviour.
- Appending data from other sources.

### **Who we might share your personal information with**

Normally, only Magenta Living will be able to access your personal information. However, we may need to share your information and information about the people you live with, with third parties. We do this to achieve the purposes as set out above.

We may share information with:-

- An Out of Hours Contact Centre service
- Our suppliers and contractors who enable us to provide our services to you, or who provide services on our behalf
- NHS Occupational Therapists for assessments to be carried out
- WBC Supported Housing Adaptations Team for Disabled Facilities Grant referral
- Housing contractors e.g. to undertake repairs, maintenance or improvements to your home
- IT providers who own or manage the computers, phones or systems we use
- Our contractors, who handle your out-of-hours service calls
- Banks, e.g. to carry out payments through a secure system
- Companies that assist us in mailing out our leaflets / newsletters
- Additional staff resources, such as consultants or agency staff
- Our professional advisors and providers of financial services

- Training providers or learning institutions
- Other housing providers
- External agencies where you have agreed to our support to assist with money problems or support for domestic abuse
- The Police, Fire Service or health professionals who provide services for you
- Utility companies
- For crime prevention or detection, risk assessment, resolution of complaints
- Local Authorities, Safeguarding Boards, regulators, government departments and other public bodies
- Magenta staff and Tenant Complaint Panel
- MPs , Councillors and the Ombudsman

We will only share the minimum information necessary for the organisation contractor or agency to carry out their services on behalf of Magenta Living.

We share limited personal information such as name, address and telephone number of our tenants with external contractors.

We do not share your personal information with anyone who claims to represent you, unless we are satisfied that you have appointed them or they act in some recognised official capacity. There may be a delay in dealing with requests while we confirm the caller's identity or check that we have your approval to deal with them.

We do not give anyone else access to your information in return for payment for their marketing or commercial purposes.

We may sometimes be obliged to disclose your personal data by law, such as by a regulator with appropriate power e.g. the Regulator of Social Housing, or court order. Information held by public bodies can be subject to the Freedom of Information Act.

Unless you pay your bills using Direct Debit, we will not usually retain your payment details. Whoever pays your bills will have to give us the payment card details each time they make a payment.

**To enhance your experience with Magenta Living, you can:**

- Give details of your friends, relatives or neighbours who you trust to contact us on your behalf, e.g. to arrange one of our services for you
- Give details of anyone to whom you have given a Power of Attorney to contact us on your behalf
- Provide your name and contact details for Customer Satisfaction surveys, newsletters and service information
- Give your consent for your name, image, video or story for brochures, advertising, press releases, social media or for use by the media
- Provide details about any complaints about our service or other individuals, or accidents or incidents involving you or your home
- Provide your comments about the services you have received from us or our suppliers.

### **How long we keep information for**

We keep documents relating to your tenancy for six years after it comes to an end, and other documents for as long as the organisation reasonably requires, which varies according to the nature and purpose of the document concerned. Further information about our retention periods is available in our retention schedule which sets out how long we keep different types of information for. This is available on request by contacting our Data Protection Officer by calling our Contact Centre on 0808100 9596 or by Emailing at [dataprotectionofficer@magentaliving.org.uk](mailto:dataprotectionofficer@magentaliving.org.uk).

### **Your rights – Accessing the information we have about you**

You have a legal right to access the information we hold on you. This is called a Data Subject Access Request.

We have a Subject Access Request form which will help you to submit your request. By law we have a maximum of one calendar month to deliver the information from the point your completed request (form) has been verified.

To access the form, you can email us at [contactus@magentaliving.org.uk](mailto:contactus@magentaliving.org.uk), telephone us on 0808 100 9596 or call into the Magenta Living's Birkenhead Office.

Your right to certain information may be restricted. For example, information relating to a third party or information relating to a Police investigation.

You have the right to ask us not to process your personal information. However, we may be unable to provide our services to you if we are unable to record and process certain details.

### **Your rights – Withdrawal of consent**

We make it easy for individuals to withdraw their consent to us processing their personal data and publicise how to do so by:

- Providing a copy of the Request to Withdraw Consent to you at the time consent is given.
- A regular article in Magenta Living's Tenant's Newsletter

Requests to withdraw should be sent to the organisation's Data Protection Officer (DPO) for recording and processing. The DPO will consult with the relevant service who originally requested consent to establish the implications and the DPO will notify the individual of the outcome. We act on individual requests to withdraw consent as soon as possible.

Withdrawing consent does not retrospectively render processing unlawful.

### **Your rights – Right to rectification**

You have the right to rectify inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed by providing a supplementary statement.

**Your rights – Right to erasure (right to be forgotten)**

You have the right (under certain circumstances, but not all) to oblige us to erase personal data concerning you.

**Your rights – Right to restriction of processing**

You have the right (under certain circumstances, but not all) to restrict processing of your personal data. For example, you may request this if you are contesting the accuracy of personal data held about you.

**Your rights – Right to data portability**

You have the right (under certain circumstances, but not all) to be provided with the personal data about you in a structured, commonly used and machine-readable format. You also have the right to ask for it to be transmitted to another controller.

**Your rights – Right to object to direct marketing**

Where your personal data is 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.

**Your rights – Right in relation to automated decision making and profiling**

Magenta Living does not perform any automated decision-making based on personal data that produces legal effects or similarly significantly affects you.

To action any of your rights please contact us on the contact details below.

For more information about any of your rights, please visit:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

**Data Augmentation**

Magenta Living uses augmentation services to satisfy its legal obligation to ensure the accuracy of personal data being processed by using, for example:

Royal Mail Postal Address File (PAF) to update redirected addresses and to ensure address accuracy and completeness.

BT Operator Services Information System (OSIS) to ensure telephone number accuracy and completeness.

## Visitors to our website

We collect the following information from visitors to our website and Customer Portal (MyMagenta). The lawful basis for this processing in most cases is legitimate interest.

- Details collected through forms, including web chat, filled in when you contact us online
- Surveys and polls about the website
- Site usage information from session cookies and log files.

## Web Browsers

Web browsers such as Google Chrome, Internet Explorer and Mozilla Firefox may store information on websites you have visited, files you have downloaded or accessed and login information for services that you use. Magenta Living do not access any information from your browser relating to any service, website or account other than those managed by Magenta Living with the exception of cookies and account details for our web pages.

## Use of cookies

Our website uses cookies, which are small text files placed on your computer by the websites you visit. They are used to help make websites work more efficiently and provide analytical information to us to help improve user experience.

We use Google Analytics to monitor website use and the type of browser that is accessing the website. We also use Google Translate to remember a visitor's language preferences.

You can control or delete cookies through the settings on your web browser.

## Links to other websites

This privacy notice doesn't cover links within our website to other websites. We encourage you to read the privacy statements on the other websites you visit.

## Search Engines

Search engines like Google and Bing search the internet for content to improve their accuracy and reduce their search times, this process is called indexing. At times some personal information about you may be indexed by search engines, for example your picture may appear in one of our news stories which may display in a google search result. Aside from the information in the cookies we use, no information is made available to, or indexed by, search engines without your consent.

## Social Media

We exclude liability for actions taken in response to breaches of any Magenta Living policy. The responses described in this privacy notice are not limited, and we may take any other action we reasonably deem appropriate.



Where you make a contribution to our social media, we may also take the following actions in addition to any other actions described above:

- Immediate, temporary or permanent withdrawal of your right to use our social media
- Immediate, temporary or permanent removal or editing of any posting or material uploaded by you to our social media.

### **Changes to this Privacy Notice**

We keep our privacy notice under regular review. We will update it if we undertake any new or amended processing. This privacy notice was last updated on 7<sup>th</sup> June 2019.

We will display the new Notice in all places where it can usually be found.

### **Required Information**

The provision of some items of personal data is a condition of your tenancy with us. Mandatory information is however kept to a minimum wherever possible. If you don't want to provide this information to us its likely we won't be able to offer you a tenancy.

### **Subsidiary Companies**

Magenta Living has subsidiary organisations who are also registered as Data Controllers with the Information Commissioner's Office. These are:-

- Hilbre Homes
- Wirral Partnership Homes Developments

### **Further Information**

This privacy notice does not provide detail on all aspects of Magenta Living's collection and use of personal information. We're happy to provide any further information or explanation needed. Please contact us using the information below.

### **How to contact us**

If you want to get in touch you can do so online at <https://www.magentaliving.org.uk/> or by phoning our Contact Centre on 0808 100 9596 or writing to us at our Head Office:

Data Controller  
Magenta Living  
Hamilton Street  
Birkenhead  
Wirral  
CH41 5AA



## Complaints

Magenta Living tries to meet the highest standards when collecting and using personal information. We take any complaints we receive seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading, inaccurate or inappropriate.

We do compile and publish statistics showing information, like the number of complaints we receive, but not in a form that identifies anyone.

You can make a complaint by calling our Contact Centre on 0808100 9596 or by writing to our Data Protection Officer at [dataprotectionofficer@magentaliving.org.uk](mailto:dataprotectionofficer@magentaliving.org.uk). If you remain unhappy with our response you have the right to complain to the Information Commissioner's Office:-

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

Telephone : 0303 123 1113  
Email : [casework@ico.org.uk](mailto:casework@ico.org.uk)