**Customer Privacy Notice**

**About Us and How We Use Your Information**

Magenta Living is a Housing Association registered with the Information Commissioner's Office (ICO) as a Data Controller. This means we are responsible for deciding how your personal information is collected, used, and protected.

Our ICO registration number is Z9137302.

We are committed to protecting and respecting your privacy. Any personal information we hold about you is kept safe, secure, and confidential, and is used only in accordance with UK data protection laws. These include the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Data (Use and Access) Act 2025, and the Privacy and Electronic Communications Regulations (PECR).

This notice explains how we collect, use, store, and share your personal information, your rights in relation to that information, and how we meet our transparency obligations under the DUAA, where applicable.

**Our Contact Details For Data Protection**

Data Protection Officer
Magenta Living
Partnership Building
Hamilton Street
Birkenhead
CH41 5AA

Tel: 0808 100 9596
**Email:** dataprotectionofficer@magentaliving.org.uk

**What this Privacy Notice explains:**

- How we store and protect your information
- Our lawful bases for using your information
- Our Legitimate Interests and what they mean
- What information we collect
- When and how we collect it
- How we use your information
- Who we may share it with
- Your data protection rights
- How to contact us or make a complaint

## How we store and protect your information

This Privacy Notice explains what you can expect when Magenta Living collects, uses, and stores your personal information. It applies to information we hold about tenants, leaseholders, service users, contractors, and suppliers.

Most personal information is stored on our secure computer systems. In some situations, we also keep paper records. Regardless of the format, all information is protected by appropriate technical and organisational security measures to keep it safe, secure, and confidential.

Magenta Living's main computer data centre is located at our head office, Partnership Building. Any computer systems used outside our offices, including those owned or managed by approved suppliers, are required to meet our security standards and are suitably protected.

If we transfer personal information outside the UK, we ensure that appropriate safeguards are in place, such as adequacy regulations or the International Data Transfer Agreement (IDTA), to protect your data.

We keep personal information only for as long as it is necessary for the purposes for which it was collected. This is set out in our Data Retention Schedule, which defines how long different types of information are kept. For example, tenancy records are usually retained for a specified period after a tenancy ends to meet legal and regulatory requirements, in this case it will be 6 years after a tenancy ends.

You can request a copy of our Data Retention Schedule by contacting our Data Protection Officer (see the contact details above or in the "Contact us" section).

## Our Lawful Basis for Processing Your Personal Information

We only collect and use your personal information when we have a valid lawful basis to do so under the UK General Data Protection Regulation (UK GDPR). Depending on the circumstances, this may include one or more of the following:

### Contract
We process your personal data where it is necessary to enter into, manage, and deliver the tenancy, agreement, or services you have with Magenta Living.

### Legal Obligation
We process personal data to meet our legal and regulatory responsibilities, including compliance with housing law, health and safety legislation, and requirements set by our regulators.

### Legitimate Interests
We may process personal data where it is necessary for our legitimate interests as a social housing provider, such as running our services safely and effectively. We ensure that these interests do not override your rights and freedoms.

### Consent
In some situations, we rely on your consent to collect or use certain types of personal information. Where we do this, you have the right to withdraw your consent at any time.

## Our Legitimate Interests

We may sometimes use your personal information where it is necessary for Magenta's *legitimate business interests*. When we rely on this lawful basis, we carefully consider the impact on you and make sure our use of your information is reasonable, proportionate, and in line with your expectations. We also put appropriate safeguards in place and will explain our legitimate interests where relevant.

Our legitimate interests include:

- Keeping our colleagues, contractors, offices, estates, and sites safe and secure, including the use of CCTV
- Handling, investigating, and learning from complaints, accidents, and incidents
- Preventing incidents from happening again
- Making sure you are billed correctly for Council Tax and utilities while you are a tenant
- Planning, improving, and personalising the services we provide to better meet tenants' needs
- Sending official communications
- Ensuring fair, equal, and accessible access to our services for everyone
- Recording and managing threatening or abusive behaviour
- Updating, verifying, or appending information using data from trusted external sources where appropriate

We only rely on legitimate interests where we believe these activities are necessary for our organisation to operate effectively and where your rights and interests are not overridden.

**What Personal Information We Collect and How We Collect It**

We collect personal information about you at different stages of your relationship with Magenta Living. This includes when you:

- Apply for a tenancy
- Request or receive our services
- Provide documents or information during your tenancy
- Respond to surveys or provide feedback
- Contact us by phone, email, online forms, your online account (such as MyMagenta), social media, or via our website

You can find further details about how we use information collected online in our Public Privacy Notice:
https://www.magentaliving.org.uk/privacy

We may also receive personal information from third parties where necessary. These can include local authorities, the police and emergency services, support agencies, and previous landlords.

**Information We May Collect**

The personal information we collect during the lifecycle of your tenancy or service use may include:

- Your name, address, and contact details (for use by Magenta Living and, where appropriate, our suppliers and partners)
- Information relating to the management and conduct of your tenancy, including reports of anti-social behaviour
- Financial information, such as income details, housing benefit information, bank details, guarantor details, and details of any credit checks carried out
- References about you, for example from a previous landlord
- Information about your home, including details provided when applying for shared ownership

For housing management and service delivery purposes, we may also collect:

- Information about your housing needs to ensure your home and services are suitable for you
- Bank details and Direct Debit information for payment of rent or service charges (we do not store card details where payments are made by debit or credit card)
- Benefit and council tax information to help verify your circumstances
- Details relating to repairs and maintenance of your home
- Information you provide to your usual Magenta Living contact
- Feedback from our contractors following appointments
- Voice recordings, video recordings, or CCTV were used for safety, crime prevention, and service quality purposes

Where necessary, we may collect limited information about children living in your household, for example to support safeguarding, service delivery, or tenancy management. This information is subject to additional security controls.

**Providing Information**

Some personal information is required by law or is necessary for us to enter into or manage a tenancy or provide certain services. If you do not provide information that is mandatory, we may be unable to offer parts of our services or proceed with a tenancy. Where information is optional, we will make this clear.

**Special Category Data**

We may also need to process special category data concerning you, which is personal data that is more sensitive and therefore, needs additional protection.

This may include information about your:

- Racial or ethnic origin
- Religious or philosophical beliefs
- Political opinions
- Trade union membership
- Health
- Sex life or sexual orientation
- Genetic data
- Biometric data (where used for identification purposes)

We will only process special category data where we have a valid lawful condition to do so. These may include:

- Your explicit consent
- Compliance with our obligations under employment, social security, or social protection law
- Protecting your vital interests, or those of another person (for example, in life-or-death situations)
- The establishment, exercise, or defence of legal claims
- Reasons of substantial public interest, where permitted by law
- Health or social care purposes, or public health, where there is a legal basis
- Archiving, research, or statistical purposes, where permitted by law
- Where the information has been made public by you

We may also process certain special category data for equal opportunities and equality monitoring purposes. This may include information about you (and, where relevant, members of your household) relating to:

- Ethnicity
- Gender
- Sexual orientation
- Disability
- Religion or belief

Where we process this information, the same lawful conditions for special category data will apply, and appropriate safeguards will always be in place.

**Personal Data Collected Incidentally to Other Activities**

We may on occasion capture personal data in the process of performing other activities. An example of this may be where we are taking photographs inside a property and these photographs include

details of persons in the property, either directly or from family photographs on walls. We will make reasonable efforts to prevent this from happening, and we will take reasonable steps to delete this information should it occur.

### How We Use Your Personal Information

We use your personal information to help us deliver our services effectively and manage our relationship with you. This includes using your information to:

- Assess applications and check eligibility
- Provide, manage, and support your tenancy or other services
- Monitor compliance with tenancy terms or service agreements
- Carry out consultations that may affect your home or tenancy
- Confirm responsibility for charges such as Council Tax and utilities
- Support household members who have specific needs
- Carry out repairs, maintenance, inspections, and safety checks
- Communicate with you about your tenancy, services, or enquiries
- Handle complaints, feedback, and other customer service matters
- Support equality, diversity, and community engagement
- Recover unpaid charges or debts where necessary
- Run surveys and research to help improve our services
- Provide information about services, events, or opportunities that may be relevant to you

Unless we tell you otherwise, we will only collect and use your personal information for these purposes. If we need to use your information for a different reason, we will explain what the purpose is, the lawful basis we are relying on, and whether the information will be shared.

### Contractors and Suppliers

If you work with us as a contractor or supplier, we may collect relevant information from you in line with our contracts or information-sharing agreements. This can include names and qualification details of staff.

We use this information to ensure you can deliver services to our tenants on behalf of Magenta Living. Information is held securely by our Procurement Team and, where necessary, by relevant teams or departments.

### Fraud Detection and Prevention

Any personal information you provide may be used to help prevent and detect fraud. This applies to information shared through our website, the Customer Portal (MyMagenta), or any other way you provide information to us.

We may use this data for data matching and further investigation, which involves comparing the information we hold with data held by third parties, solely for fraud prevention and detection. Where we suspect fraud, we may carry out further checks with organisations such as the Land Registry, banks, schools, or utility companies.

When using personal data for fraud detection and investigation, our lawful basis is compliance with our legal obligations to prevent, investigate, and assist with suspected fraud.

**Who We Share Your Personal Data With**

Normally, only Magenta Living staff can access your personal information. However, where necessary, we may share your information – including information about people you live with – with trusted organisations to help us provide services or meet legal and regulatory obligations.

We may share your information with:

- Contractors, suppliers, consultants, agency staff, and partners who deliver services on our behalf
- Repairs, maintenance, and improvement contractors
- Consultation, research, and survey companies
- NHS Occupational Therapists for assessments
- IT service providers and out-of-hours call handling services
- Banks and payment providers for secure payments
- Mailing companies for newsletters and service information
- Support and training organisations where we make a referral (with your agreement where required)
- Other housing providers and lettings services
- Utility companies and local authorities for billing and account verification
- Emergency services, including the Police, Fire Service, and health professionals
- Local Authorities, Safeguarding Boards, regulators, and government bodies
- Professional advisers such as legal or financial specialists
- Magenta Living staff, the Tenant Complaint Panel, MPs, Councillors, and the Housing Ombudsman
- Debt collection partners where money is owed

We may also share information where necessary for safeguarding, crime prevention, risk assessments, complaint handling, or incident investigations.

**Debt Recovery**

If you owe money to Magenta Living, we may share your information with carefully selected debt recovery partners so they can contact you, discuss repayment options, and recover outstanding amounts. These organisations must keep your information secure and only use it for this

purpose.

**International Transfers**

We do not routinely transfer your personal information outside the UK. Any transfers outside of the UK will comply with the UK GDPR including:

- Sharing to a destination granted an adequacy decision; or
- Implementing an appropriate safeguard to facilitate for the transfer and undertaking a risk assessment on the destination country.

**How We Share Your Information**

- **Minimum data** – we only share the information needed for another organisation to carry out their role.
- **Authorised representatives only** – we will only share information with someone acting for you where you have given permission or they hold a formal authority, such as Power of Attorney. We may need to verify identity first.
- **No selling of data** – we never sell your personal information or share it for marketing or commercial gain.
- **Legal requirements** – we may share information where required by law, including with courts, the Police, or regulators (such as the Regulator of Social Housing). Some information held by public bodies may be subject to the Freedom of Information Act.

**Information You May Choose to Provide**

You may choose to provide information such as:

- Details of trusted friends, relatives, or representatives who can contact us on your behalf
- Details of anyone with Power of Attorney or other formal authority
- Contact details for surveys, newsletters, or service updates
- Consent for your name, image, or story to be used in communications or promotional materials
- Information about complaints, incidents, or feedback about our services

**Your Data Protection Rights**

You have several rights under data protection law that help you stay in control of your personal information, and we want to make sure you are fully aware of these rights. These rights apply in different circumstances, and some may be limited where the law requires us to keep or protect certain information.

If you would like to exercise any of them or need further information, please contact us by email at **contactus@magentaliving.org.uk** or using the details provided in the *How to contact us* section. Further details are set out below:

**1. The right to access your information**

You have the right to request a copy of the personal information we hold about you. This is known as a *Data Subject Access Request* and helps you understand what information we hold and how we use it. This right may be restricted in certain situations, for example where the information relates to another individual or an ongoing police investigation.

**2. The right to withdraw consent**

Where we rely on your consent to use your personal information, you have the right to withdraw that consent at any time, this right is absolute where consent is the chosen lawful basis.

Withdrawing consent does not make any previous use of your information unlawful. Requests should be made to our Data Protection Officer (DPO), who will review the request and confirm what will happen next.

**3. The right to correct inaccurate information**

You have the right to ask us to correct or update any personal information we hold about you if it is inaccurate or incomplete. We will make these changes as soon as possible once we receive the correct information.

**4. The right to have your information erased**

In certain circumstances, you can request that we delete personal information we hold about you. This right does not apply where we are required by law to keep the information, such as for legal, regulatory, or tenancy management purposes.

**5. The right to restrict how your information is used**

In some situations, you have the right to ask us to restrict the use of your personal information. This means we will store the information but temporarily stop using it, for example while accuracy is checked or a concern is being reviewed.

**6. The right to data portability**

Where applicable, you can ask us to provide the personal information you gave us in a clear, easy-to-use electronic format. You may also ask us to send it to another organisation of your choice. This right applies only to information processed by consent or as part of a contract.

**7. The right to object to direct marketing**

You have the right to object at any time to the use of your personal information for direct marketing purposes, including any profiling linked to marketing. If you do so, we will stop immediately.

## 8. Rights relating to automated decision-making and profiling

Magenta Living does not make decisions about you based solely on automated processing that produce legal or similarly significant effects. Important decisions about your tenancy or services are not made by computers alone.

For more information about any of your rights, or to exercise them, please contact us using the details in the *How to contact us* section or speak to our Data Protection Officer. You can also find guidance on data protection rights on the Information Commissioner's Office (ICO) website.

## How we use Artificial Intelligence (AI)

Magenta Living may use simple Artificial Intelligence (AI) tools to support our work and improve our services. These tools help us work more efficiently and maintain service quality. For example, AI may be used to help us:

- organise and manage information
- identify patterns, such as repeated repair issues
- check information for errors or inconsistencies
- support our customer service teams

AI is not used to make decisions about your tenancy, your legal rights, or your household. Any decision that affects you is always reviewed and made by a member of staff.

You can ask us at any time:

- how a decision involving AI support was made
- to have a person review a matter instead of an automated tool being used

We use AI responsibly and in line with data protection law, ensuring its use is fair, safe, and transparent.

## Data Accuracy (Data Augmentation)

Magenta Living uses trusted data augmentation services to help ensure the personal information we hold is accurate, complete, and up to date, in line with our legal obligations under data protection law.

These services may include:

- **Royal Mail Postal Address File (PAF)** – to check and update address details, including redirected addresses
- **BT Operator Services Information System (OSIS)** – to help ensure telephone number accuracy and completeness

These checks help us maintain accurate records and support effective communication with you.

## Social Media

Magenta Living is not responsible for any actions taken in response to breaches of our policies. The actions set out in this notice are not exhaustive, and we may take any other reasonable steps we consider appropriate.

If you post or contribute to Magenta Living's social media channels, we may take steps to protect our customers, colleagues, and communities. This may include:

- Removing or editing posts or materials you upload
- Temporarily limiting or permanently withdrawing your access to our social media channels

These actions may be taken where content is inappropriate, breaches our policies, or causes concern for the safety or wellbeing of others.

## Changes to this Privacy Notice

We review this notice regularly and update it when needed. The latest version will always be available where you normally view it.

## Subsidiary Companies

Magenta Living has subsidiaries that are also Data Controllers, including:

- **Bamboo Estates LLP**

## How to Contact Us

**Phone:** 0808 100 9596
**Email:** dataprotectionofficer@magentaliving.org.uk
**Post:**
Data Protection Officer
Magenta Living
Partnership Building
Hamilton Street
Birkenhead
CH41 5AA

## How to Make a Complaint

We take any concerns about the collection and use of personal information seriously. If you believe our use of information is unfair, misleading, or inappropriate, we encourage you to raise this with us. You have the right to make a complaint using the details provided in our 'Contact Us' section. We will investigate all complaints, acknowledge them within 30 days, and respond without undue delay.

If you are unhappy with how your personal data has been used, you can complain via:

- Our online feedback form https: www.magentaliving.org.uk/your-voice/complaints-and-feedback/
- Phone: 0808 100 9596
- Email: yourvoice@magentaliving.org.uk
- Post: Partnership Building, 45 Hamilton Street, Birkenhead, CH41 5AA
- In person at our Customer Hub

We will investigate your complaint, update you and provide a clear written response

You also have the right to make a complaint to the Information Commissioner's Office (ICO).You can use the contact details below.

ICO
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113
Email: casework@ico.org.uk
Website: www.ico.org.uk