Privacy Notice

HATTON HOUSING TRUST LIMITED

3 September 2026

Hatton Housing Trust Limited Bank House Bank Street Tonbridge Kent TN9 1BL

Telephone: 01732 770660 Fax: 01732 362452

V5

WHAT IS THE PURPOSE OF THIS DOCUMENT?

Hatton Housing Trust Limited are committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the UK General Data Protection Regulation (UK GDPR).

It applies to all tenants and committee members.

Hatton Housing Trust Limited (our corporate name; we will refer to ourselves as “the association” in this document) is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to current and former tenants and committee members. This notice does not form part of your tenancy agreement or other contract between you and the association. We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

DATA PROTECTION PRINCIPLES

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.

2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.

3. Relevant to the purposes we have told you about and limited only to those purposes.

4. Accurate and kept up to date.

5. Kept only as long as necessary for the purposes we have told you about.

6. Kept securely.

THE KIND OF INFORMATION WE HOLD ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

We may collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Gender.
- Marital status and dependants.
- Next of kin and emergency contact information.
- National Insurance number for some individuals.
- Bank account details.
- Occupation.
- Copy driving licence and passport of some individuals.
- Car registration.
- Photographs.

We do not actively collect, and do not currently store or use any "special categories" of sensitive personal information, such as:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Information about your health, including any medical condition, health and sickness records.

  Information about criminal convictions and offences.

HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We typically collect personal information about tenants and committee members through our application process.

We may sometimes collect additional information from third parties including former tenants and committee members and credit reference agencies or other background check agencies.

In terms of credit checks, we currently use Creditsafe:

- We may obtain information about you to help us assess your tenancy application and ongoing tenancy, to prevent fraud, and/or to meet our legal and regulatory obligations.
- Creditsafe uses its data partner TransUnion to supply consumer credit and identity data.

- Creditsafe Business Solutions Limited is authorised and regulated by the Financial Conduct Authority, with FCA Firm Reference Number: 742313
- TransUnion International UK Limited is authorised and regulated by the Financial Conduct Authority, with FCA Firm Reference Number: 805757
- The information we receive may include data relating to your identity, credit commitments, payment history, and public record information. This data is used solely for legitimate business purposes, including creditworthiness assessment, identity verification, and fraud prevention, in accordance with applicable data protection laws.
- Further information about how Creditsafe and TransUnion process your personal data can be found in their respective privacy notices:
  Creditsafe Privacy / Transparency Notice:
  Transparency Notice | Customers & Suppliers
  TransUnion CRAIN (Credit Reference Agency Information Notice):
  https://www.transunion.co.uk/legal/privacy-centre/pc-credit-reference
  TransUnion Bureau Privacy Notice:
  https://www.transunion.co.uk/legal/privacy-centre/pc-bureau

We will collect additional personal information in the course of association activities throughout the period of your residency or membership as a committee member.

HOW WE WILL USE INFORMATION ABOUT YOU

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform our obligations or enforce our rights under the tenancy agreement we have entered into with you.

2. Where we need to comply with a legal obligation.

3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).

2. Where it is needed in the public interest or for official purposes.

SITUATIONS IN WHICH WE WILL USE YOUR PERSONAL INFORMATION

We need all the categories of information in the list above (see **THE KIND OF INFORMATION WE HOLD ABOUT YOU**) primarily to allow us to perform or enforce our tenancy agreement with you and to enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

- Making a decision about your tenancy application.

- Determining the terms on which you occupy any property.
- Checking you are legally entitled to be in the UK.
- Administering the tenancy agreement we have entered into with you.
- Gathering evidence for possible legal matters relevant to the association or your neighbours.
- Making decisions about your continued occupation of a property.
- Making arrangements for the termination of your tenancy agreement.
- Providing references or disclosing information to third party landlords, including other housing associations and charities, in respect of your occupation of any property.
- Dealing with legal disputes involving you, or other residents, including accidents at any association property.
- Complying with health and safety obligations.
- To prevent fraud.
- Equal opportunities monitoring.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

IF YOU FAIL TO PROVIDE PERSONAL INFORMATION

If you fail to provide certain information when requested, we may not be able to perform the tenancy agreement we have entered into with you, or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our residents).

CHANGE OF PURPOSE

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

SENSITIVE PERSONAL INFORMATION

As stated above, we do not actively collect, store or use any "special categories" of sensitive personal information, and we do not ever envisage having to do so. However, we may have to process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of

giving your consent. We do not need your consent in these situations, or if any such processing is necessary for the establishment, exercise or defence of legal claims, for health and social care purposes or if there is substantial public interest.

Should we ever need to process certain special categories of personal information, we will approach you for your written consent to allow us to process that particularly sensitive data (but this is not envisaged as stated above).

CRIMINAL CONVICTIONS

Again, we do not envisage that we will hold any information about criminal convictions.

However, we will collect information about criminal convictions if it is appropriate and where we are legally able to do so.

AUTOMATED DECISION-MAKING

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention.

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

DATA SHARING

We may have to share your data with third parties, including third-party service providers.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We do not transfer your personal information outside the UK.

If we do, you can expect a similar degree of protection in respect of your personal information.

Why might you share my personal information with third parties?

We may share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we or third parties have legitimate interests in doing so.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents).

As you are likely to already know, Warners Law LLP (“Warners Solicitors”) in Tonbridge process your personal information on our behalf. They are also a controller of your personal data and you can access their Third Party Privacy Notice from their website at *https://www.warners-solicitors.co.uk/privacynotices/*

How secure is my information with third-party service providers?

Our third-party service providers are required to take appropriate security measures to protect your personal information. We do not allow our third-party service providers to use your personal data for their own purposes.

What about other third parties?

We may need to share your personal information with applicable regulators or to otherwise comply with the law.

We may determine that it is necessary in our or a third party' legitimate interests to disclose your personal information to a third party when giving references or dealing with requests about your occupation of any property. Those third parties will themselves become data controllers in respect of your personal information.

Transferring information outside the UK

We do not transfer the personal information we collect about you outside of the United Kingdom.

DATA SECURITY

Warners Solicitors, who process your personal data on our behalf, have put in place measures to protect the security of your information. Details of these measures are available upon request.

Other third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

Warners Solicitors 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, access to your personal information is limited to those persons who have a need to know. As a firm of solicitors, they are subject to a stringent duty of confidentiality.

Warners Solicitors have put in place procedures to deal with any suspected data security breach and we (or Warners directly) will notify you and any applicable regulator of a suspected breach where legally required to do so.

DATA RETENTION

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may encrypt or anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a tenant or committee member, we will ensure that Warners Solicitors retain and securely destroy your personal information in accordance with their data retention policy or otherwise in accordance with applicable laws and regulations.

RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us and/or Warners Solicitors informed if your personal information changes.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

- **Request the transfer** of your personal information to another party.

Please note that we can refuse to comply with a request where we need to process information for the establishment, exercise or defence of legal claims or to comply with a legal obligation.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact Warners Solicitors at *dataprotection@warners.law*.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we (or Warners Solicitors when they are acting as data controller) may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we (or Warners Solicitors) may refuse to comply with the request in such circumstances.

What we may need from you

We (or Warners Solicitors) may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact Warners Solicitors at ***dataprotection@warners.law***. Once they have received notification that you have withdrawn your consent, we (and they) will no longer process your information for the purpose or purposes you originally agreed to, unless we (or Warners Solicitors) have another legitimate basis for doing so in law.

NO DATA PROTECTION OFFICER

We have not appointed a data protection officer (DPO) but Warners Solicitors oversees compliance with this privacy notice for the association. If you have any questions about this privacy notice or how we (or Warners Solicitors) handle your personal information, please contact Warners Solicitors at ***dataprotection@warners.law***. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact Warners Solicitors at *dataprotection@warners.law*.