



Privacy Notice for Customers and Residents

Who are we?

East Midlands Housing Group Limited ('emh Group') is a registered co-operative and community benefit society with registration number 30476R and operates as a non-asset owning parent company, with two largely ring fenced functional divisions: emh Housing and Regeneration Limited, trading under the name 'emh', which is a Registered Provider regulated by the Regulator of Social Housing (registration number 4775) and emh Care & Support Limited, whose regulated activities fall within the remit of the Care Quality Commission. Midlands Rural Housing & Village Development Association Limited and Sharpes Garden Services Limited, are non-registered providers which are also entities within emh Group.

For the purposes of this privacy notice, when we say "emh", "we", "us" or "our", we are referring to East Midlands Housing Group Limited, its subsidiaries and its group entities. For a list of the entities within the emh Group, please see: [meet the emh group Board | emh group - emh group](#)

This privacy notice may be supplemented by any number of privacy notices, and in which case, we strongly advise you to read this privacy notice alongside any supplemental privacy notice emh Group produces, these include:

Privacy Notice for Care & Support

Privacy Notice for Customers of Midlands Rural Housing

Privacy Notice for Involved Residents

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 about how we collect and process your personal information throughout your custom and/or tenancy 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, and how long it will usually be retained for. It provides you with certain information that must be provided under the UK GDPR, the Data Protection Act 2018 and any subsequent legislation or regulatory requirements in force from time to time, or any successor legislation.



This notice primarily covers how we use information relating to our customers and residents. It makes you aware of how and why your personal information will be used, and how long we will usually keep your personal information for. In these cases, we will be the “data controller” for the purposes of UK data protection law.

How We Use Your Personal Data

Lawful basis, what we collect, why we use it, and example retention periods			
Lawful basis	What we collect	Why we use it	Example retention periods
Consent	Contact information such as name, date of birth, previous address, telephone number, email address, supporting documents and marketing or communication preferences.	To register your interest, send updates you have asked for, and enable you to take part in surveys, consultations or other optional communications.	Until consent is withdrawn, or for a short period afterwards where needed to maintain suppression records.
Contract	Profile details such as username, password, account activity, reports you submit, interests, preferences, feedback and survey responses.	To provide website services, manage your account, respond to requests you make through the website, and support participation in surveys or consultations linked to our services.	For the life of the account or service relationship, plus up to 6 years where needed for legal claims or record-keeping.
Legal obligation	Contact information, technical data, audit records and other information needed to meet legal, regulatory, safeguarding, fraud prevention, security or reporting requirements.	To comply with legal and regulatory duties, administer and protect our website and business, investigate issues, maintain security, and meet reporting obligations.	Usually for as long as required by law or regulatory guidance; for example, some website security logs may be kept for around 30 days.
Legitimate interests	Contact information, technical data, profile details, records of correspondence, preferences and website usage information.	To manage our relationship with website visitors, respond to enquiries, improve our website and services, carry out analytics, maintain systems, and ensure communications remain relevant and respectful of your choices.	Varies by record type; for example, correspondence may be kept for up to 6 years and analytics or cookie-related data for shorter periods depending on the tool.



How We Use Your Special Category Personal Data

Lawful basis, special category data we collect, why we use it, and example retention periods			
Lawful basis	What we collect	Why we use it	Example retention periods
Explicit consent	Special category information you choose to provide to us for a specific purpose.	To use the information for the particular purpose you have clearly agreed to.	Until consent is withdrawn, unless we must keep it for a legal reason.
Social protection law obligation	Disability information, ethnicity, religion, sexuality, and details of unspent convictions or criminal offences where relevant.	To meet our responsibilities as a social housing provider, comply with the Equality Act 2010 and other legal duties, meet regulatory reporting requirements, assess tenancy suitability, manage safeguarding and risk, and identify where additional support may be needed.	Usually for the life of the relationship and regularly reviewed; some records may be kept for longer where required for safeguarding, legal claims or compliance.
Substantial public interest / legal claims / information made public by you	Relevant special category information where it is necessary to protect people, establish, exercise or defend legal claims, or where you have clearly made the information public.	To deal with serious risks, protect individuals, handle legal matters, and comply with wider public interest obligations where the law allows us to do so.	For as long as needed for the relevant risk, legal matter or compliance requirement.

Information about criminal convictions

We may only use information relating to criminal convictions where the law allows us to do so. This is usually where that processing is necessary to carry out our obligations and provided we do so in line with our **Data Protection Policy** and **Special Category Data Policy**.

We envisage that we will in some cases process information about criminal convictions in connection with providing services to you. For example, to ensure that we house you appropriately and that specialised support services are offered to you, where required.

We have in place appropriate safeguards which we are required by law to maintain when processing such data.



How do we use your personal information?

We need all the categories of information in the list above (see **What information do we collect about you?** above) primarily to allow us to perform our contract with you and to enable us to comply with our 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:

- ▶ To register you as a customer.
- ▶ To communicate with you about your tenancy.
- ▶ To assist us with selling your property.
- ▶ To administer our waiting lists.
- ▶ To administer housing and property grants.
- ▶ To perform our contract or service to you.
- ▶ To manage our relationship with you, including notifying you about changes to our contract or services or asking you to provide us with feedback.
- ▶ To administer and protect the organisation.
- ▶ To protect the organisation from tenancy fraud.
- ▶ To comply with any legal or regulatory obligation.
- ▶ To maintain our accounts and records.
- ▶ To support and manage our employees, agents and contractors.
- ▶ As part of our marketing and promotional activities (if you agree).

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 unrelated purposes, we will notify you and we will explain the legal basis which allows us to do so.

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
- ▶ Video footage or other recordings



- ▶ Face to face meetings
- ▶ Statements you provide to us
- ▶ Declaration of Interests
- ▶ Social media.

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.

Generally, we do not rely on consent as a legal basis for processing your personal information other than in relation to sending direct marketing communications to you via email or text message. You have the right to withdraw consent to such marketing at any time.

When do we share your information?

Recipient/category of organisation	Purpose of sharing
IT providers	To provide data processing services to us, host and support our website and systems, and assist with security, maintenance and service delivery.
Third parties, including third party service providers in connection with services performed on our behalf	For example, our email provider, platform provider, analytics providers, search engine providers and other suppliers who help us improve, support and optimise our website and related services.
Our regulators, such as the Regulator of Social Housing and the Housing Ombudsman	Where we are under a legal or regulatory obligation to provide information, including for compliance, oversight and complaint handling.
Government bodies and law enforcement agencies	Where sharing is required or permitted by law, including for safeguarding, fraud prevention, prevention or detection of crime, legal claims, referrals or to access support services.
Other companies within the emh Group	To provide you with joined-up support, maintain accurate records, and deliver services consistently across the group where appropriate.
Our insurers and legal or other professional advisers	To obtain advice, manage claims, respond to disputes, support audits, and protect our legal position where necessary.
Third parties to whom we may choose to transfer or merge parts of our business or our assets	If our business changes, the new owners or merged organisation may use your personal data in the same way as set out in this privacy notice.

How do we keep your 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 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.

Our arrangements with third party service providers are governed by contractual provisions with us and they only have access to personal information to perform the described purposes and may not use it for other purposes.

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 UK 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 subject to the requirements of the UK GDPR.

Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

1. Where we have notified you of the decision and given you one month to request a reconsideration.
2. Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.
3. In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

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.

Access to and correction of the information we hold about you

You can find out if we hold any personal information about you by making a 'subject access request' under the UK 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



► If we are able to, 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 us at this address:

emh, Governance Risk and Assurance Team, Memorial House, Stenson Road, Coalville, and Leicestershire, LE67 4JP. Or by email us at 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.

If any of your personal information changes, such as a contact number or email address, please let us know right away so we can update our records.

Your rights

Under data protection law, you have rights including:

Your right of access – You have the right to ask us for copies of your personal information.

Your right to rectification – You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure – You has the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing – You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing – You have the right to object to the processing of your personal information in certain circumstances.

Your right to data portability – You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

Your right to withdraw consent – If the lawful basis for processing is consent, you have the right to withdraw that consent at any time. Please note that withdrawal will not affect the lawfulness of processing carried out before you withdrew consent, and we may still be entitled to process the information where another lawful basis applies.

Your 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.

Profiling and automated decision-making – You also have the right not to be subject to a decision based solely on automated processing, including profiling, where this produces legal or similarly significant effects on you. We do not carry out automated processing or profiling in this context.



To exercise any of these rights, or if you require any further information about your rights, please contact us using the details in the **How to contact us** section below.

Complaints and your right to complain

We take any complaints we receive about the collection and use of personal information very seriously. We encourage you to bring it to our attention in the first instance 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 using the details in the **How to contact us** section below.

Under the Data Use and Access Act 2025, there is a right to complain to us first before taking your concern to the Information Commissioner's Office. We will do our best to investigate your concern and respond appropriately.

If you remain unhappy, or if you think our collection or use of personal information is unfair, misleading or inappropriate, or 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 at: 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 Risk & Assurance 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

Privacy Notice updates

Our Privacy Notice will be regularly reviewed, and it may change at any time in the future, we encourage you to check this Privacy Notice regularly.