



# Privacy Notice for Website Users

## 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 subsidiaries of emh Group (collectively referred to as "emh Group", "we", "us" or "our" for the purposes of this privacy notice).

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 through your use of and interaction with our website (<https://www.emh.co.uk/>). This privacy notice aims to give you information on how we collect and process your personal information throughout your care 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, Data Protection Act 2018, the Data Use and Access Act 2025 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 visitors to our website and people who interact with or do business with us by using our website. In these cases, we will be the “data controller” for the purposes of UK data protection law.

## **What information do we collect about you?**

We collect information when you register with us or express interest in any of the services we provide via our website. For further information about how we use this information once you engage with our services, please see our **Privacy Notice for Customers and Residents**.

If you currently work for us or apply for a role with us and would like further information about how we process the information you provide to use, please see our **Privacy Notice for Workforce and Job Applicants**.

We may also collect information from you if you provide us with information indicating that you, or you act on behalf of anyone, who receives care and support from us. For further information about how we use this information, please see our **Privacy Notice for Care and Support Services**.

When using our websites we collect four main types of information from visitors:

- ▶ Feedback (general questions and specific feedback on the website)
- ▶ Requests for information
- ▶ Survey responses
- ▶ Site usage information (from session cookies and log files)

We do not pass on any personal information you have given us to any other site. The system will record your email address, and other information if volunteered to us by you, for example on the Feedback forms. This will be treated as proprietary and confidential.

Our website contains links to other websites. This privacy notice applies only to sites administered by emh Group. You should always be aware when you are moving to another site and read the privacy statements of any site which collects personal information.

As a visitor to our website, the information we hold will either have been provided by you (e.g. as you interact with us) or be collected by automated technologies as you interact with our website. As you interact with our website, we will automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.



We have set out below a description of all the ways we plan to use your information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. We may process your information for more than one lawful ground depending on the specific purpose for which we are using your information.

Please note, our website is not intended for children and we do not knowingly collect data relating to children via our website.

## How We Use Your Personal Data

We only collect and use personal information where we have a valid legal basis for doing so. The sections below explain what data we process, why we process it, and the legal basis that applies.

### Consent

We process the following information when you give us your clear permission:

- Contact information – name, date of birth, previous address, telephone numbers, email address, and supporting documents (which may include photographs of you or joint applicants).

Why:

- To register your interest with emh Group
- To send you email updates you have requested
- To enable you to take part in surveys or consultations

- Marketing and communication preferences

Why:

- To send you updates and information you have chosen to receive
- To include you in surveys or consultations you have opted into

### Contract

We process the following information when it is necessary to enter into or perform a contract with you:

- Profile details – username, password, reports you submit (e.g., repairs or anti-social behaviour), interests, preferences, feedback, and survey responses.

Why:

- To register your interest with emh Group
- To enable participation in surveys or consultations



## Legal Obligation

We process the following information when required to comply with the law:

- Contact information (as listed above)  
Why:
  - To administer and protect our business and website, including troubleshooting, data analysis, testing, system maintenance, support, reporting, and hosting
- Technical data – IP address, browser type/version, time-zone settings, location, plug-ins, operating system, and device information  
Why:
  - To administer and protect our website and IT systems

## Legitimate Interests

We process the following information because it is necessary for our legitimate business purposes, and these interests are not overridden by your rights:

- Contact information  
Why:
  - To manage our relationship with website visitors, including responding to comments, compliments, and complaints
  - To administer and protect our website and business operations
- Technical data  
Why:
  - To improve our website, marketing, user experience, and services through analytics
  - To support system security and maintenance
- Profile details (e.g passwords, username)  
Why:
  - To administer and protect our website and business
  - To manage our relationship with website visitors
  - To provide you access to your account
- Records of correspondence  
Why:
  - To manage our relationship with website visitors and respond to enquiries
- Marketing and communication preferences  
Why:



- To manage how we communicate with you and ensure we respect your choices

## Particularly sensitive information we may collect about you

### How We Use Your Special Category Personal Data

"Special categories" of personal data require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information in the following circumstances:

- in limited circumstances, with your explicit written consent;
- where we need to carry out our legal obligations in field of employment/social security law;
- where there is a substantial public interest with a basis defined by the Data Protection Act 2018.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where you have already made the information public.

The sections below explain what we process, why we process it, and the legal basis that applies.

### Social Protection Law Obligation

We process the following information where required to meet our responsibilities as a social housing provider and to comply with regulatory and legal obligations:

#### Details of Unspent Convictions or Criminal Offences

This may include information about custodial sentences, being on a register, or being identified as a person of interest.

#### Why we use it:

- To assess the suitability of a tenancy
- To ensure there are no unacceptable risks to customers, neighbours, staff, or contractors

### Disability Information

#### Why we use it:

- To meet our obligations under the Equality Act 2010
- To comply with regulatory reporting requirements
- To identify and offer additional services, such as tenancy support



## **Ethnicity, Religion and Sexuality**

### **Why we use it:**

- For monitoring and analysis required by our regulator
- To comply with the Equality Act 2010
- To help us understand and improve the services we provide, including offering additional support where appropriate

## **How is your information collected?**

Personal data is any information about an individual from which that person can be identified. The personal information that we may collect about you broadly falls into the following categories:

### **Information that you provide voluntarily**

We may process and store information that you have provided voluntarily. For example, when you sign up to our newsletter we will ask you to provide your email address. It will be clear to you at this point what personal data you are providing.

### **Information that we obtain from third party sources**

From time to time, we may obtain personal information about you from third party sources (for example data brokers), but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

### **Information that we collect from your activities**

We collect information about how you use our website automatically through the use of cookies and other technologies. Some of these cookies can be enabled/disabled by selecting your preferences in the preference centre you are presented with when first interacting UK with this site. More information on cookies can be found under the 'Use of cookies' section below.

### **Public information**

We may collect information about you from publicly available sources such as corporate websites and public social media accounts in order to reach out to you and promote our products and services. You can ask us to delete your information at any time.

## **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 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.



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.

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
- ▶ Statements and correspondence you provide to us
- ▶ Declaration of Interests

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, by clicking unsubscribe links on any marketing communication we send to you or by contacting us at any time at [dataprotection@emh.co.uk](mailto:dataprotection@emh.co.uk).

## When do we share your information?

We will not normally share your information with anyone else. However, there are certain circumstances where we will be required to share your information with other organisations. We will comply with UK data protection law when disclosing this information. Where it is required or necessary in accordance with UK data protection law, we may disclose your personal information to the following categories of recipients:

<b>Recipient/Category of organisation</b>	<b>Purpose of sharing</b>
<b>IT providers</b>	To provide data processing services to us, or who otherwise process personal information for purposes that are described in this Privacy Notice.
<b>Third parties, including third party service providers in</b>	For example, our email provider, our IT provider, our platform provider and analytics and search engine



<b>connection with services performed on our behalf.</b>	providers that assist us in the improvement and optimisation of our website.
<b>Our Regulators, such as the Regulator for Social Housing and Housing Ombudsman.</b>	We are under a legal obligation to provide this information to the appropriate regulators and the housing ombudsman (e.g. referral measures).
<b>Government bodies and law enforcement agencies, such as the Housing Benefits department, social services and the police.</b>	We share information with services dependent on the circumstance, including but not limited to finding further financial support or handling any safeguarding concerns or to provide any referrals to their services, however, most of this sharing is completed on a case-by-case basis (whereas Housing Benefits etc. will conduct this routinely).
<b>With third parties to whom we may choose to transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them.</b>	If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
<b>Other companies within the emh Group.</b>	To provide you accurate support throughout the usage of our services (including safeguarding, health and safety etc.)
<b>With our insurers and legal advisors.</b>	(Ad-hoc) To provide contextual information when filing an insurance claim/when legal advice is required regarding an escalating situation (e.g. referrals, SARs, court cases).

We will not sell or rent your personal information to third parties. Where we share your information with third parties, we will ensure:

- we provide only the information they need to perform their specific services.
- they may only use your data for the exact purposes we specify in our contract with them.
- we work closely with them to ensure that your privacy is respected and protected at all times.
- if we stop using their services, your data held by them will either be deleted or rendered anonymous.

This list is not exhaustive as there are other circumstances where we may also be required to share information, for example:



- ▶ To meet our legal obligations.
- ▶ In connection with legal proceedings (or where we are instructed to do so by Court order).

## Why do we use your personal information?

For further information about the purposes for which we will use your personal information, please see the general **Privacy Notice for Customers and Residents**.

- To set up and maintain your tenancy account with us.
- To help prevent tenancy fraud
- To provide information on extra services we provide and update our regulator
- To ensure we deal with the most appropriate person dealing with your affairs
- To ensure you are not overcrowded or under-occupying a property.

## Use of Cookies

Our website uses cookies. By using our website, you agree to this privacy statement, and you consent to our use of cookies in accordance with the terms of this statement.

emh Group uses OneTrust to monitor cookie use. The technology automatically scans a website to identify all trackers and allows organisations to generate a tailorable cookie consent banner, cookie preference centre and cookie list.

## What are cookies?

A cookie is a small file placed on your computer hard drive that helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

There are two main kinds of cookies: session cookies and persistent cookies. Session cookies only last for the duration of your visit to the website and are deleted from your computer when you close the browser. Persistent cookies outlast user sessions and remain stored on your computer until deleted or until they reach their expiry date.

Most browsers allow you to reject all cookies, while some browsers allow you to reject just third-party cookies.

## Why we use cookies

Cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not.

Cookies are specific to the server that created them and cannot be accessed by other servers, which means they cannot be used to track your movements around the web.



Although they can be used to store information which may identify a computer, they cannot be used to identify you personally.

**Ways we use cookies include:**

- ▶ Recognising your device so you do not have to give the same information several times during one task;
- ▶ Recognising that you may already have given a username and password so you do not need to do it for every web page requested;
- ▶ Measuring how many people are using services so they can be made easier to use and there is enough capacity to ensure they are fast.
- ▶ Our customer account service MyHomeOnline uses cookies to remember your font size preferences and help us identify that you are the only person accessing your account.

**Google Analytics**

We use Google Analytics to analyse the use of this website. Google Analytics generates statistical and other information about website use by means of cookies. The information generated relating to our website is used to create reports about its use which we can use to improve the site.

Cookies do not contain any information that personally identifies you. A cookie in no way gives us access to your computer or any information about you.

You can learn more about these small files and how to manage them yourself on [www.aboutcookies.org](http://www.aboutcookies.org)

**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.

**International data transfers**

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.

We do not conduct any international transfers at this current stage. However, if we are to ever transfer personal data overseas, then we will update this privacy notice accordingly and ensure that appropriate safeguards are in place to carry this out.

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.

### **How long do we keep your information for?**

We will only retain 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. For further information about the relevant retention periods applicable to visitors to our website, please see the **What information do we collect about you?** Section above.

We only hold information about you for as long as it is needed for the purpose(s) it was collected, or as required by law.

Some examples of our data retention periods include:

<b>Personal data</b>	<b>Retention period</b>
Name	Until end of tenancy + 6 years
Address	Until end of tenancy + 6 years
Survey Results	2 Years after date of survey

### **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 & Assurance Team, Memorial House, Stenson Road, Coalville, and Leicestershire, LE67 4JP.**



Or by emailing us at [dataprotection@emh.co.uk](mailto: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

You may also 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, though please note, there are some specific circumstances where these rights do not apply and we can refuse to deal with your request.

Furthermore, 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 have 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 however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent, and we may still be entitled to hold and process the relevant personal information to the extent that



we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain services to you.

### **Your right to object to direct marketing**

- Where your personal data are 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.

### **Profiling and automated decision making**

- You also have the right to object to and not to be subject to a decision based solely on automated processing including profiling. We do not carry out automated processing or profiling. To exercise any of these rights, please contact the email below.

If we are processing your personal information based upon your consent (e.g. as part of our marketing or promotional activities), 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 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 (see **How to contact us** below).

Under the Data Use and Access Act 2025, there has been the introduction of the **right to complain**, which means that you come to us prior to going to the ICO if you have any complaints or concerns. We will do our best to resolve this for you. However, 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 policy or the information we hold about you. You can do so via one of the contact details below;

- **Email - [dataprotection@emh.co.uk](mailto: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 whenever you visit our website.