

# Supplemental Privacy Notice for Customers

## Who are we?

Midlands Rural Housing & Village Development Association Limited ('MRH'), which is a registered co-operative and community benefit society with registration number 24278R, is a group company within East Midlands Housing Group Limited ('emh Group'), which is registered co-operative and community benefit society with registration number 30476R, and is a subsidiary of emh Housing and Regeneration Limited (trading as 'emh'), which is a Registered Provider regulated by the Regulator of Social Housing (registration number 4775).

For the purposes of this Privacy Notice, when we say "we", "us" or "our", we are referring to Midlands Rural Housing & Village Development Association Limited.

This Privacy Notice is supplementary to, should be read in conjunction with, and does not amend and/or replace the following:

### **Privacy Notice for Customers and Residents**

## What is the purpose of this notice?

This privacy notice aims to give you information on how we collect and process your personal information. 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 or when you use any of our services, 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, 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 our residents but also covers non-residents using our services. It makes you aware of how and why your personal information will be used, namely for the purposes of managing your tenancy agreement, and how long we will usually keep your personal information for. In these cases, we will be the "data controller" for the purposes of data protection law.

## 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, postal address, telephone numbers, email address, and supporting information you choose to provide. Why: to register your interest in our services, respond to your enquiries, and send you updates you have requested.

Marketing and communication preferences. Why: to send you updates and information you have chosen to receive and 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 – usernames, passwords, application details, reports you submit, interests, preferences, feedback, and survey responses. Why: to provide access to online services, process requests, and manage our relationship with you.

## Legal Obligation

Contact information and technical data, including IP address, browser type/version, time zone setting, location, operating system and device information. Why: to administer and protect our business, website and IT systems, including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting.

## 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, technical data, profile details, records of correspondence, and marketing and communication preferences. Why: to manage our relationship with you, respond to enquiries, improve our website and services, support system security and maintenance, and ensure we respect your communication choices.

## How We Use Your Special Category Personal Data

Special category personal data requires higher levels of protection. We only process this information where we have an additional lawful condition under data protection law. The sections below explain what we process, why we process it, and the lawful basis that applies.

## Social Protection Law Obligation

We process the following information where required to meet our responsibilities and comply with regulatory and legal obligations: details of unspent convictions or criminal offences, disability information, and information about ethnicity, religion and sexuality. Why: to assess suitability for services or housing, manage risks, meet obligations under the Equality Act 2010, comply with regulatory reporting requirements, and help us understand and improve the services we provide, including offering additional support where appropriate.

## 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.

Recipient/Category of organisation	Purpose of sharing
IT providers	To provide data processing services to us, or otherwise process personal information for purposes described in this privacy notice.

Third party service providers	For example, email providers, platform providers, analytics providers and search engine providers that assist us in improving and optimising our website and services.
Regulators and ombudsman services	Where we are under a legal obligation to provide information to the relevant regulator or ombudsman.
Government bodies and law enforcement agencies	Where sharing is required depending on the circumstances, including safeguarding, fraud prevention, legal compliance, referrals, or other statutory functions.
Other companies within the emh Group	To provide consistent support across services and ensure relevant teams have the information they need.
Insurers and legal advisers	To obtain legal advice, manage claims, or respond to disputes and formal requests.

## Example retention periods

We only hold information about you for as long as it is needed for the purpose or purposes it was collected, or as required by law. Some examples of retention periods are set out below.

Personal data	Example retention period
Name and address	Until end of tenancy or service relationship, plus 6 years
Photographs	Until end of tenancy or service relationship, plus 6 years
Survey Results	2 years from date of survey

## Your rights

Under data protection law, you have rights including: the right of access, the right to rectification, the right to erasure, the right to restriction of processing, the right to object to processing, the right to data portability, the right to withdraw consent where consent is the lawful basis, the right to object to direct marketing, and rights relating to profiling and automated decision-making. These rights apply in certain circumstances and may be subject to exemptions.

## 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. Under the Data Use and Access Act 2025, there is a right to complain to us first, and we will do our best to resolve your concerns.
- 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.
- Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

We have appointed a Data Protection Officer to oversee our compliance in line with Data Protection legislation. 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.