

We respect your privacy and are committed to protecting your personal data. This privacy notice will tell you how we look after your personal data and tell you about your privacy rights.

This privacy notice applies regardless of how you provide personal data to us.

Purpose of this Privacy Notice

This privacy notice tells you how Alliance Homes collects and processes your personal data obtained by any method, including data you may provide through our website, when you make an enquiry, raise a problem or query, sign up to our newsletter, apply for a tenancy or any housing provided by us, participate in a shared ownership scheme, purchase a property from us, move into a property we provide service to, request to use or be supplied with any of our (or our contractors') services, complete a survey or provide us with information.

We have a separate privacy notice for people who work for us. If you are an occupier of one of our homes and you apply to work for us, then we will give you further information about the personal data that we will need and how we will use it.

We also offer a number of specialist support services. It is important that you read this privacy notice together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you (for example in relation to our support services) so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Changes to the privacy Notice and your duty to inform us of changes

We keep our privacy notice under regular review. This version was last updated in January 2025. Historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third Party links on our website

Our website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy notices. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Cookies on our website

We use cookies to enable us to provide the best user experience on this website. We use necessary cookies to make our website work, and we would also like to set analytics cookies that help us make improvements by measuring how you use our site. Third-party content may also set additional cookies. These will be set only if you consent to the use of all cookies. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we set, see our [cookie policy](#).

Controller

Alliance Homes is the controller and responsible for your personal data (collectively referred to as "we", "us", or "our" in this privacy notice).

We have appointed a data protection officer who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data protection officer using the details set out below.

Contacting us

Our full name: NSAH (Alliance Homes) Limited is a housing association regulated by the Regulator for Social Housing (number L4459). NSAH (Alliance Homes) Limited is a registered society under the Co-operative and Community Benefit Societies Act 2014 (registration number IP29804R).

Registered office: 40 Martingale Way, Portishead, North Somerset, BS20 7AW

ICO registration number: Z9355710

Name or title of data protection officer: Director of Business Services

Email address: businessservices@alliancehomes.org.uk

Postal Address: 40 Martingale Way, Portishead, North Somerset, BS20 7AW

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 (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

The data we collect 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).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** including first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender, and image.
- **Contact Data** including home address, email address and telephone numbers. We will ask for your preferred method of contact and try to use that whenever we can.
- **Marketing and Communications Data** including your preferences in receiving marketing from us and our third parties and your communication preferences.

Where we provide you with housing or are your landlord, we will additionally collect the following data:

- **Identity Data** including the names of any appointees to help with benefit applications or rent payments and anyone who will live with you), date of birth, employment status, National Insurance number, and address.
- **Household Data** including the number and age of members of your family and anyone else living with you.
- **Financial Data** including bank account and payment card details where we take payments from you for our services. Bank statements, details of income and expenditure for the purposes of affordability checks and budgeting support
- **Transaction Data** including details about payments to and from you and us, for example the amount and timing of payments for rent made by you to us.

- **Profile Data** including details of your housing needs when you apply for housing so that we know who needs housing most urgently, and your interests, preferences, feedback and survey responses.
- **Contract Data** including the date of completion, lease start and expiry date, complaints, repair raised, including detail of repairs, stage of complaints, internal notes & comments detailing the complaint, Ombudsman referrals, enforcement actions, gas safety checks, electrical certificates, and utilities supply.
- **Vulnerability Data** which is data that our Regulator asks us to collect to ensure that we can provide support to residents. This includes data about health and disabilities, capacity, and housing life events such as whether you need any additional support in relation to having recently left care, being a refugee or asylum seeker, or are being impacted by anti-social behaviour or domestic violence.

We also collect, use, and share Aggregated Data such as statistical or demographic data. Aggregated Data may be derived from your personal data but is not considered personal data in law as you cannot be identified from this data. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

Special Categories of Personal Data

We may in certain circumstances collect Special Categories of Personal Data about you, in particular where you provide us this type of data and we treat it as Vulnerability Data. This includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, and information about your health, medical records and treatment plans, and genetic and biometric data.

Where we collect Special Categories of Personal Data, we ensure that we meet a legal condition for us to process this data. This will generally be either that we have obtained your informed consent to this processing, that the processing of this data is necessary for the purposes of us providing you with housing, or that our processing is necessary for safeguarding purposes.

Criminal offence data

We may also collect information about criminal convictions and offences. We will do this only where it is relevant to your use of our services or housing provided by us, for example convictions for arson, housing fraud, sexual offences or the use or supply of drugs.

For our specialist support services we may collect other types of data. If that is the case we will tell you when you use the service.

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

How your personal data is collected

Direct interactions: You may provide us with your personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for housing or shared ownership,

- create an account on our website;
- subscribe to our service or publications;
- complete surveys or forms
- use our services;
- provide feedback.

Automated technologies or interactions: As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy on our website for further details. We may also monitor and record telephone calls. CCTV cameras operating at our offices or estates may record your image. We use CCTV for the detection and prevention of crime. CCTV, sound recordings and photography may be used to capture evidence of breaches of tenancy agreements, alleged anti-social behaviour and crime. For more information about how long we will retain CCTV for, please contact us.

Third parties or publicly available sources: We may receive personal data about you from various third parties and public sources such as:

- Department of Work and Pensions;
- Ministry of Housing Communities and local Government
- Other landlords;
- Debt collection agencies;
- Health Authorities or Health Professionals.
- Police

We may also be provided with further personal data by other individuals. This will vary on a case-by-case basis but could include data provided in relation to alleged anti-social behaviour, complaints, fraud and breaches of tenancy agreements or leases.

We sometimes receive data from other referral agencies for our specialist support services and where this is the case we will inform you of the data we hold when you are referred to our service.

How we use your personal data

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

- **Performance of a contract:** Where we need to perform our obligations under a contract we are about to enter into or have entered into with you.
- **Legitimate interests:** 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; for example, to monitor a rent account, identify and recover any debts. Legitimate interests means our interest in conducting and managing our business to enable us to give you the best service. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not rely on legitimate interests to use your personal data for activities where our interests are overridden by the impact on you.

- **Legal obligation:** Where we need to comply with a legal or regulatory obligation and appropriate safeguards are in place to protect your fundamental rights; for example, to establish the right of an individual to rent a home from us or where we collect Vulnerability Data in order to provide you with support, as required by our regulator.
- **Vital interests:** Where we need to process your data in order to protect you, or another person's vital interests.
- **Consent:** Where you have provided consent to us processing your data for a specific purpose.

Special Categories of Data

Where we process special categories of data, in addition to the grounds set out above we must also meet a legal condition. Most commonly this will be one of the following conditions:

- **Housing:** Where we need to process your data in order to carry out our obligations and exercise our rights in the field of employment, social security and social protection law, which includes the provision of housing.
- **Legal claims:** Where our processing of your data is necessary for the establishment, exercise, or defence of legal claims.
- **Substantial public interest:** Where we need to process your data for reasons of substantial public interest, which can include safeguarding.
- **Vital interests:** Where we need to process your data in order to protect your, or another person's vital interests, and you are not physically or legally able to provide consent.
- **Consent:** Where you have provided explicit consent to us processing your data for a specific purpose.
- **Archiving and statistics:** Where our processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email.

An exception is when you use our support services. In this instance we rely on your consent to collect and process data necessary for that service.

Where we do rely on consent, we will always explain what data we are collecting and why and ask you to make a positive choice to consent. You have the right to withdraw consent at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data on different lawful grounds depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as an applicant for housing	(a) Identity (b) Contact (c) Household (d) Criminal convictions (e) Financial information	(a) Performance of a contract with you (b) Necessary to comply with our legal obligations (c) Necessary for our legitimate interests (to progress your application)
To process and deliver our service including: (a) Manage payments, fees, and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover sums and debts due to us)
To administer and protect our operations	(a) Identity (b) Contact (c) Household (d) Special Category Data (e) Criminal convictions	(a) Necessary for our legitimate interests (b) Necessary to comply with our legal obligations (c) Necessary for reasons of substantial public interest
To provide you with support and services which are tailored to your and your household's needs	a) Identity b) Contact c) Household d) Vulnerability e) Special Category Data f) Profile	a) Necessary for our legitimate interests b) Necessary to comply with our legal obligations The legal condition we rely upon for processing Special Category Data is either that it is necessary for reasons of substantial public interest being usually safeguarding, or that it is necessary for our provision of housing to you.

1. For our legitimate interests, or for those of other people or organisations:
 - a) for the good governance and good management of our business and website
 - b) for the good management of our homes (including their upkeep and condition)
 - c) for the good management of our communities, our estates, and neighbourhoods
 - d) to monitor communications with and activity of our customers
 - e) for market research, analysis and developing statistics
 - f) to send communications about our business and how it supports our occupiers
 - g) to establish and defend our legal rights
 - h) in the event of a merger, reorganisation, or restructuring.
2. To carry out our obligations in law:
 - a) dealing with requests under data protection law and regulation
 - b) for activities relating to the prevention, detection, and investigation of crime
 - c) to verify identity, check immigration status, prevent fraud and money laundering
 - d) providing our residents with support taking into account their diverse needs, as required by our regulator.
3. Reasons of substantial public interest:
 - a) The prevention of crime and unlawful acts
 - b) Safeguarding
 - c) to monitor and review equality of opportunity to access our products and services

If you have given your consent (for example when using one of our specialist support services) then we rely on that consent as the lawful basis for processing data.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We partner with Microsoft Clarity and Microsoft Advertising to capture how you use and interact with our website through behavioural metrics, heatmaps, and session replay to improve and market our products/services. Website usage data is captured using first and third-party cookies and other tracking technologies to determine the popularity of products/services and online activity. You can manage your cookie preferences through our cookie settings panel, accessible via the cookie banner or footer of our website.

Additionally, we use this information for site optimisation, fraud/security purposes, and advertising. For more information about how Microsoft collects and uses your data, visit the [Microsoft Privacy Statement](#).

You may receive marketing communications by post from us if you have requested information from us or purchased from us or if you provided us with your details and, in each case, you have not opted out of receiving that marketing.

Opting out

You may opt out of receiving these communications from us at any time. Where you opt out of

receiving these marketing messages, this will not apply to personal data provided to us as a result of your tenancy or any other contract, service, or other transaction with us.

We do not share your personal data with any third party for marketing purposes.

Change of purpose

We will only use your personal data 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data 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 data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law, for example where there is a medical emergency or a safeguarding issue.

Sharing your personal data

We may share your personal data with the parties set out below:

- Service providers acting as processors who provide IT, payment and system administration services or carry out repairs, improvements, or cleaning at our properties.
- Third parties who conduct customer surveys on our behalf in order for us to continuously improve our services and to collect Vulnerability Data.
- Professional advisers, including lawyers, bankers, auditors, and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Local Authorities such as district, borough and city councils or government departments such as the Department for Work and Pensions and Ministry of Housing Communities and Local Government where we are under a legal obligation to provide them with your personal information, or where we share information to assist us to provide you with certain services.
- Grant Funders, whereby the conditions of the grant funding require anonymised data to be provided.
- The police where necessary to protect the safety of our tenants, staff and third parties and to prevent damage to property.
- Fraud prevention, credit reference and debt collection agencies, and utility companies where we are required to do so to deal with occupiers' debt.
- Third parties to whom we may choose to sell, transfer, or merge parts of our operations or our assets. Alternatively, we may seek to acquire other operations or merge with them. 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.
- In an emergency, with another party where doing so will protect a person's vital interest.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own

purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

If you use one of our specialist support services, then we may share your special category data with other parties with your explicit consent.

We may also share data with anyone else if you ask us to do so, for example landlord references, enquiries you make through a third party, at your request.

International transfers

We do not typically transfer your personal data outside the United Kingdom (UK).

If we do transfer any personal data abroad, this will typically simply be because a service provider carries out some operations from other countries, such as IT help desks.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including 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.

Where we collect data in order to assess your application for a service (for example when you apply for housing) we will keep that data only for as long as we need it to make the assessment and to deal with any queries that arise from that decision.

For legal reasons we have to keep basic information about our customers and tenants (including Contact, Identity, Household, Financial and Transaction Data) for six years after they cease being customers or tenants.

We will keep the most basic information (your name, the property address, and dates of tenancy) about your tenancy for 60 years so that we have a record if you wish to take part in any Right to Buy schemes in the future.

Where you have applied for a shared ownership property, we will keep all applications for 6 months and shortlisted applications for 12 months. Details of shared owners will be kept for 6 years after they have moved on or purchased the property.

Whilst we have general retention periods, we may need to depart from these from time to time where there is good reason to do so, for example where there are statutory or regulatory requirements, or we need to keep the information to deal with any legal claims.

In some circumstances you can ask us to delete your data: see below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Your legal rights

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data:

- **Request access to your personal data** (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request for an erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing of your personal data** 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data: -
 - if you want us to establish the data’s accuracy;
 - where our use of the data is unlawful, but you do not want us to erase it;
 - where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims;
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- **Request the transfer of your personal data to you or to a third party.** We will provide you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided with consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time where we are relying on consent** to process your personal data. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us in writing via email to businessservices@alliancehomes.org.uk, by post to Business Services, Alliance Homes, 40 Martingale Way, Portishead, North Somerset, BS20 7AW or by telephone 03000 120 120.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.