



PROSPECTIVE TENANTS

This section will detail what personal information we collect about you and use if you are a prospective tenant.

What personal data will we collect?

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" includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, nationality and gender.

"Contact Data" includes correspondence address, email address and telephone numbers, and previous address data.

"Next of kin details" includes contact details for next of kin.

"Language Data" includes information about your language needs.

"Financial Data" includes bank account and payment card details.

"Eviction Data" details around any previous eviction.

"Reference Data" details received from a referee provided.

"Relationship Data" details of relationship with other tenant.

"Armed Services Data" details around any service in the armed forces.

"Benefits and Pensions Data" details of any benefit and pension received.

"User Data" Customer self service log in and account details.

What special categories of personal data will we collect?

Sometimes we will ask for or obtain special categories of information (information relating to your health, genetic or biometric data, criminal convictions, sexual orientation, racial or ethnic origin, religious or philosophical beliefs) because it is relevant to the housing services we provide to you or information regarding criminal convictions for the purposes of preventing, detecting and investigating fraud. The types of special categories of personal data or information regarding criminal convictions that we may collect include;

- Health data, for example, medical conditions and whether any member of the household is pregnant.
- Details of any disability or vulnerability.
- Details of any previous harassment.
- Details of criminal convictions and/or anti social behaviour.
- Details of ethnicity and immigration status.

What will we use your personal data for?

We will use the categories of personal data and sensitive personal data in order to add you to the Housing Waiting List Database and, if your application is successful, in order to register you as a new tenant.

We have set out below, in a table format, a description of 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 for more than one lawful ground 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 on the Housing Waiting List Database and in order to register you as a new tenant | <p>Personal Data</p> <ul style="list-style-type: none"> (a) Identity data (b) Contact data (c) Language data (d) Eviction data (e) Reference data (f) Financial data (g) Relationship data (h) Armed services data | <p>Some personal data must be processed in order for us to take steps at the request of the you prior to entering into a contract and then when we have entered into a contract with you (i.e. a tenancy agreement)</p> <p>In other circumstances it is necessary for the legitimate interests of us in order to assess the suitability of the accommodation, provide you with appropriate accommodation and access and provide appropriate support.</p> <p>In certain circumstances we will process the personal data in order to comply with our legal and regulatory obligations (such as in relation to fraud and universal credit), and acting in the public interest</p> |
| | <p>Special Categories of Personal Data</p> <ul style="list-style-type: none"> (i) Health Data (j) Immigration status (k) Harassment Data (l) Eviction data (m) Criminal Data (n) Disability and vulnerability data (o) Anti-social behaviour data | <p>We minimise our holding and use of sensitive categories of personal information but, given the services we provide, there are times when we use it to ensure that we understand your needs (for example when providing accommodation for disabled persons, or persons with risks relating to medical conditions, harassment or criminal activity)</p> |

| | | |
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| | (p) Ethnicity | <p>and in order to help you access care services.</p> <p>We will usually be processing this information to allow us to comply with our legal obligations, act in the substantial public interest in relation to the services we provide, to provide you with social care, or to deal with any legal action. There may be times where we need to ask you for your consent to use this type of personal information, in which case we will always notify you and make this clear.</p> |
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Privacy Notice – Next of Kin and Emergency Contact Details

This section will detail what personal information Pine Court Housing Association (PCHA), collect about you and use if one of our tenants nominates you as next of kin and/or an emergency contact.

What personal data will we collect?

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

“Identity Data” includes first name, maiden name, last name, username or similar identifier, title and date of birth.

“Contact Data” includes correspondence address, email address and telephone numbers.

What will we use your personal data for?

We will use your personal data to contact you in case of emergency.

Legal Justification

PCHA process next of kin and emergency contact details for the purpose of legitimate interests. It is in the legitimate interests of the tenant concerned and the data subject (next of kin/emergency contact) to contact them if an emergency situation arises.

Retention

The retention of Next of Kin and Emergency Contact Details will be kept in line with the tenancy file retention of 6 years after the end of tenancy.

[View the full version of the Pine Court Housing Association Privacy Notice.](#)

Privacy Notice – Business Partners

This section will detail what personal information Pine Court Housing Association collect about you and use if you are working at an organisation which we work with in order to provide our services.

What personal data will we collect?

Personal data, or personal information, means any information about a living 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” includes first name, maiden name, last name, username (if you are a tenant) or similar identifier, marital status, title, date of birth and car registration numbers.

“Contact Data” includes correspondence address, email address and telephone numbers, and previous address data.

We do not actively collect any special categories of your personal information.

What will we use your personal data for?

We need to use your personal information for our legitimate interests such as in order to keep business and accounting records, manage our business operations, provide our services and to improve quality, training and security.



Privacy Notice – Members of the Public

This section will detail what personal information Pine Court Housing Collect about you and use if you are a member of the public.

What personal data will we collect?

Personal data, or personal information, means any information about a living 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” includes first name, maiden name, last name, username (if you are a tenant) or similar identifier, marital status, title, date of birth and car registration numbers.

“Contact Data” includes correspondence address, email address and telephone numbers, and previous address data.

What will we use your personal data for?

We will use your personal data to process complaints and insurance claims made to Pine Court Housing Association.

[View the full version of the Pine Court Housing Association Privacy Notice.](#)



INDEPENDENT LIVING TENANTS

This section will detail what personal information we collect about you and use if you are an independent living tenant with us.

What personal data will we collect?

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" includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, nationality and gender.

"Contact Data" includes correspondence address, email address and telephone numbers, and previous address data.

"Language Data" includes information about your language needs.

"Financial Data" includes bank account and payment card details.

"Eviction Data" details around any previous eviction.

"Reference Data" details received from a referee provided.

"Relationship Data" details of relationship with other tenant.

"Armed Services Data" details around any service in the armed forces.

"Benefits and Pensions Data" details of any benefit and pension received.

"User Data" customer self service log in and account details.

"Tenancy data" information relevant to your tenancy with us.

"Complaint data" information relevant to a complaint that you make.

We may collect, use, store and transfer different kinds of personal data to our telephone/care (including lifeline equipment and any peripherals e.g. falls detectors, door sensors, sensory aids etc.) response service, about you.

What special categories of personal data will we collect?

Sometimes we will ask for or obtain special categories of information (information relating to your health, genetic or biometric data, criminal convictions, sexual orientation, racial or ethnic origin, political religious or philosophical beliefs) because it is relevant to the housing services we provide to you or information regarding criminal convictions for the purposes of preventing, detecting and investigating fraud. The types of special categories of personal data or information regarding criminal convictions that we may collect include

- Health data, for example, medical conditions and whether any member of the household is pregnant.
- Details of any disability or vulnerability.

- Details of any previous harassment.
- Details of criminal convictions and/or anti social behaviour.
- Details of ethnicity.

What will we use your personal data for?

Once you are a tenant with us we will use your categories of personal data and sensitive personal data set out above in order to provide our services and other related services to you.

We have set out below, in a table format, a description of 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 for more than one lawful ground 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 |
|--|---|--|
| <p>To manage your tenancy, this includes:</p> <p>(a) Provision, maintenance and termination of the accommodation</p> <p>(b) Management of payments, fees and charges</p> <p>(c) Universal credit registration, claim and support</p> <p>(d) Support with independent living</p> <p>(e) Anti-social behaviour recording and police referrals</p> <p>(f) Collecting and recovering money owed to us</p> <p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> | <p>Personal Data</p> <p>(a) Identity Data</p> <p>(b) Contact Data</p> <p>(c) Language Data</p> <p>(d) Financial Data</p> <p>(e) Relationship Data</p> <p>(f) Benefits and Pensions Data</p> <p>(g) User Data</p> <p>(h) Tenancy data</p> <p>(i) Complaint data</p> | <p>Some personal data must be processed in order for us to take steps at the request of you prior to entering into a contract and then when we have entered into a contract with you (i.e. a tenancy agreement)</p> <p>In other circumstances it is necessary for the legitimate interests of us in order to assess the suitability of the accommodation, provide you with appropriate accommodation and access and provide appropriate support.</p> <p>In certain circumstances we will process the personal data in order to comply with our legal and regulatory obligations (such as in relation to fraud and universal credit), and acting in the public interest</p> |
| | <p>Special Categories of Personal Data</p> | <p>We minimise our holding and use of sensitive categories of</p> |

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| <p>(b) Asking you to leave a review or take a survey (c) Undertaking tenancy audits (d) Complaints and collective disputes</p> <p>To provide you with services related to your tenancy;</p> <p>(a) Safeguarding of both adults and children (b) Lifeline services (c) Community Development Fund Applications</p> | <p>(j) Health data (k) Disability or vulnerability data (l) Details of criminal convictions and/or anti social behaviour (m) Details of ethnicity</p> | <p>personal information but, given the services we provide, there are times when we use it to ensure that we understand your needs (for example when providing accommodation for disabled persons, or persons with risks relating to medical conditions, harassment or in relation to criminal activity and safeguarding) and in order to help you access care services.</p> <p>We will usually be processing this information to allow us to comply with our legal obligations, to act in the substantial public interest in relation to the services we provide, to provide you with social care, or to deal with any legal action. There may be times where we need to ask you for your consent to use this type of personal information, in which case we will always notify you and make this clear.</p> |
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[View the full version of the Pine Court Housing Association Privacy Notice.](#)

Board Members

The Sovini Group is 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) and the Data Protection Act 2018 with effect from 25th May 2018.

The Sovini Group consists of a number of different legal entities which includes Sovini Limited and a number of Group Members. Further information about our Group Members can be found here: <https://sovini.co.uk/our-group-members/>. For simplicity throughout this notice, 'we' and 'us' means the Sovini Group.

Data protection principles

We will comply with data protection law, which say 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.

How we use Board Member information

The categories of employee information that we collect, process, hold and share include:

- Personal information (such as name, employee number, address, national insurance number)
- Special categories of data including characteristics information such as gender, age, ethnic group
- Contract information (such as start dates, attendance, role(s) and remuneration information)
- Attendance/absence information (such as number of absences and reasons)
- Qualifications and employments details
- Medical information
- Details required for Statutory Registers (Companies House/FCA Registration/Charities Commission)

Why we collect and use this information

We use this data to:

- Enable the development of a comprehensive picture of Board Membership and how it is deployed
- Ensure the continued development of recruitment policies/processes
- Enable individuals to receive remuneration and for the Sovini Group to fulfil all other obligations under your contract
- Financial management of the Sovini Group
- Meet Legal and Statutory requirements

Lawful bases for processing of your data

The lawful bases for which we will process your data are:

- Where processing is necessary for the performance of the contract(s) to which you are party.
- Where processing is in our legitimate interests or that of a third-party
- Where processing is in your vital interests
- Where you have consented to such processing
- Where we are legally obliged to

Who we share this information with

We routinely share your information with partner agencies - examples include:

- The Regulator
- Companies House
- FCA
- Consultants working on our behalf
- Payroll
- HMRC
- IT Services
- Auditors

Sensitive Personal Data

In certain circumstances sensitive personal data may be processed or shared with third parties.

Other sensitive data may also be processed internally for the purpose of monitoring equality within the organization.

Website Profile

Your website profile (which contains your photograph) is also included on our website under the 'Meet the Board' section, but we will consult you on that in advance of it being included, and profiles are removed when someone steps down from the Board. The profile may also be shared with candidates being interviewed if you are an Interview Panel Member.

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.

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.

Data protection officer

We have appointed a data protection officer (DPO), Stephen Reilly, to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO on;

Email address: dpenquiries@sovini.co.uk

Telephone number: 0151 709 6878

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.



EXISTING AND FORMER TENANTS

This section will detail what personal information we collect about you and use if you are a tenant with us or you were formerly a tenant.

What personal data will we collect?

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" includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, nationality and gender.

"Contact Data" includes correspondence address, email address and telephone numbers, and previous address data.

"Language Data" includes information about your language needs.

"Financial Data" includes bank account and payment card details.

"Eviction Data" details around any previous eviction.

"Reference Data" details received from a referee provided.

"Relationship Data" details of relationship with other tenant.

"Armed Services Data" details around any service in the armed forces.

"Benefits and Pensions Data" details of any benefit and pension received.

"User Data" customer self service log in and account details.

"Tenancy data" information relevant to your tenancy with us.

"Complaint data" information relevant to a complaint that you make.

What special categories of personal data will we collect?

Sometimes we will ask for or obtain special categories of information (information relating to your health, genetic or biometric data, criminal convictions, sexual orientation, racial or ethnic origin, political religious or philosophical beliefs) because it is relevant to the housing services we provide to you or information regarding criminal convictions for the purposes of preventing, detecting and investigating fraud. The types of special categories of personal data or information regarding criminal convictions that we may collect include:

- Health data, for example, medical conditions and whether any member of the household is pregnant.
- Details of any disability or vulnerability.
- Details of any previous harassment.
- Details of criminal convictions and/or anti social behaviour.
- Details of ethnicity.

What will we use your personal data for?

Once you are a tenant with us we will use your categories of personal data and sensitive personal data set out above in order to provide our services and other related services to you.

We have set out below, in a table format, a description of 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 for more than one lawful ground 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 |
|---|--|--|
| <p>To manage your tenancy, this includes:</p> <ul style="list-style-type: none"> (a) Provision, maintenance and termination of the accommodation (b) Management of payments, fees and charges (c) Universal credit registration, claim and support (d) Support with independent living (e) Anti-social behaviour recording and police referrals (f) Collecting and recovering money owed to us <p>To manage our relationship with you which will include:</p> <ul style="list-style-type: none"> (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey (c) Undertaking tenancy audits | <p>Personal Data</p> <ul style="list-style-type: none"> (a) Identity Data (b) Contact Data (c) Language Data (d) Financial Data (e) Relationship Data (f) Benefits and Pensions Data (g) User Data (h) Tenancy data (i) Complaint data | <p>Some personal data must be processed in order for us to take steps at the request of you prior to entering into a contract and then when we have entered into a contract with you (i.e. a tenancy agreement)</p> <p>In other circumstances it is necessary for the legitimate interests of us in order to assess the suitability of the accommodation, provide you with appropriate accommodation and access and provide appropriate support.</p> <p>In certain circumstances we will process the personal data in order to comply with our legal and regulatory obligations (such as in relation to fraud and universal credit), and acting in the public interest</p> |
| | <p>Special Categories of Personal Data</p> <ul style="list-style-type: none"> (j) Health data | <p>We minimise our holding and use of sensitive categories of personal information but, given the services we provide, there are times when we use it to</p> |

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|---|---|--|
| <p>(d) Complaints and collective disputes (e) providing, signposting and/or recommending relevant support services for the purpose of your benefit and welfare. We may make suggestions and recommendations to you about services that may be of interest to you.</p> <p>To provide you with services related to your tenancy;</p> <p>(a) Safeguarding of both adults and children (b) Lifeline services (c) Community Development Fund Applications</p> | <p>(k) Disability or vulnerability data (l) Details of criminal convictions and/or anti social behaviour (m) Details of ethnicity</p> | <p>ensure that we understand your needs (for example when providing accommodation for disabled persons, or persons with risks relating to medical conditions, harassment or in relation to criminal activity and safeguarding) and in order to help you access care services.</p> <p>We will usually be processing this information to allow us to comply with our legal obligations, to act in the substantial public interest in relation to the services we provide, to provide you with social care, or to deal with any legal action. There may be times where we need to ask you for your consent to use this type of personal information, in which case we will always notify you and make this clear.</p> |
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OCCUPANT

This section will detail what personal information we collect about you and use if you are an occupant in one of our properties.

What personal data will we collect?

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" includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, nationality and gender.

"Contact Data" includes correspondence address, email address and telephone numbers, and previous address data.

"Language Data" includes information about your language needs.

"Financial Data" includes bank account and payment card details.

"Eviction Data" details around any previous eviction.

"Reference Data" details received from a referee provided.

"Relationship Data" details of relationship with other tenant.

What special categories of personal data will we collect?

Sometimes we will ask for or obtain special categories of information (information relating to your health, genetic or biometric data, criminal convictions, sexual orientation, racial or ethnic origin, religious or philosophical beliefs) because it is relevant to the housing services we provide to you or information regarding criminal convictions for the purposes of preventing, detecting and investigating fraud. The types of special categories of personal data or information regarding criminal convictions that we may collect include;

- Health data, for example, medical conditions and whether any member of the household is pregnant..
- Details of any disability or vulnerability.
- Details of any previous harassment.
- Details of criminal convictions and/or anti social behaviour.
- Details of ethnicity.

What will we use your personal data for?

If you are an occupant in one of our properties let to a tenant, we will use your categories of personal data and sensitive personal data set out above to ensure our accommodation services are appropriate for both the tenant and you as the occupant.

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 upon to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending upon 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 upon 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 and manage a tenancy agreement for a tenancy where you will be an occupant | <p>Personal Data</p> <ul style="list-style-type: none"> (a) Identity data (b) Contact data (c) Language data (d) Eviction data (e) Reference data (f) Financial data (g) Relationship data | <p>It is necessary for the legitimate interests of us in order to assess the suitability of the accommodation, to provide you and the main tenant and with appropriate accommodation, and access and provide appropriate support.</p> <p>In certain circumstances we will process the personal data in order to comply with our legal and regulatory obligations (such as in relation to fraud and universal credit), and acting in the public interest.</p> |
| | <p>Special categories of data</p> <ul style="list-style-type: none"> (h) Health Data (i) Immigration status (j) Harassment Data (k) Eviction data (l) Criminal Data (m) Disability and vulnerability data (n) Anti-social behaviour data (o) Details of ethnicity | <p>We minimise our holding and use of sensitive categories of personal information but, given the services we provide, there are times when we use it to ensure that we understand your needs (for example when providing accommodation for disabled persons, or persons with risks relating to medical conditions, harassment or in relation to criminal activity and safeguarding) and in order to help you access care services.</p> <p>We will usually be processing this information to allow us to comply with our legal obligations, to act in the substantial public interest in relation to the services we provide, to provide you with</p> |

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| | | social care, or to deal with any legal action. There may be times where we need to ask you for your consent to use this type of personal information, in which case we will always notify you and make this clear. |
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