



# Privacy Policy

November 2023

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## Who we are

Agudas Israel Housing Association (AIHA) is a non-profit organisation which is registered under the Industrial & Provident Societies Act 1965 and is registered with the Housing Corporation.

AIHA exists to respond to the housing and housing related needs of the Orthodox Jewish Community. Its Aims and Objectives are to develop high quality homes, suitable and affordable for those of the Community who need them most.

AIHA is a controller of personal information for the purposes of the UK General Data Protection Regulation (UK GDPR – as supplemented and amended by the Data Protection Act 2018)

## Reason for Notice

As part of the services we offer, we are required to process personal data about our tenants, service users, staff and volunteers, contractors, and suppliers and, in some instances, the friends or relatives of our stakeholders. "Processing" can mean collecting, recording, organising, storing, sharing, or destroying data.

We are committed to providing transparent information on why we need your personal data and what we do with it. We are committed to treating your information securely, with respect and in line with data protection law.

This Privacy Notice tells you what to expect when AIHA processes your personal information. This is the main Privacy Notice for AIHA. However, some of our services may have additional privacy notices which will be provided to you when you engage or register for such a service. It is important for you to read this policy in full to understand what information we hold about you, why we need to hold this information, how we may use it and your rights in relation to your data.

We keep our Privacy Notice under regular review. If you would like to receive a hard copy of our current Privacy Notice, please let us know.

## Data Controller contact information

If you have any concerns or questions, please contact the Data Protection Officer:

Mrs Chaya Spitz  
Agudas Israel Housing Association Ltd  
206 Lordship Road London N16 SES  
[chaya.spitz@aihaltd.co.uk](mailto:chaya.spitz@aihaltd.co.uk)  
Tel: 020 8815 3072

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## What information we need to collect

In order for AIHA to provide a professional service and operate as a provider of housing, we need to keep certain records about you. Below is a set of purposes for which AIHA may be processing data, depending on your relationship with the organisation.

### Tenants and Service Users

We may record the following data about you, and if relevant, your household:

- Basic details and contact information, including date of birth, telephone numbers, email addresses, and details of NOK, guardians, or anyone you may choose to represent you
- Your national insurance number, income and benefit details and employment status
- Your financial details e.g., details of how you pay us for services or your funding arrangements
- Copy of ID including passport, driving license
- Financial services information
- Your employment status
- Information about your history, for example regarding credit status or offences (if we need it to look after our staff, business, or anyone else)
- Details relating to the repair, maintenance, and servicing requirements of your home (although this information will not necessarily constitute your personal data)
- To ensure our services are accessible, that we take account of any support needs in our dealings with you and to improve our communications with you. For example, if you are involved with a carer, social worker, or other advocate, if there are considerations we need to apply when we visit you at home, if you need large print or translated text
- When profiling you for services and to target our resources

We may also record the following data which is classified as 'sensitive data':

- Health and Social Care data about you, which might include both your physical and mental health data
- Any communication and accessibility requirements
- Details of any disability
- Medical information
- Data about your religion, race, ethnic origin, sexual orientation, relationship status, caring responsibilities

We will apply additional security and confidentiality measures when processing your sensitive personal information.

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## Contractors and Suppliers

We hold relevant information about our contractors and suppliers with the same level of security.

## Legal basis for processing

We often have more than one main legal basis for processing personal data. Firstly, where it is necessary for the purposes of the legitimate interests pursued by AIHA or by a third party to process your information. We can do that so long as we do not interfere with your fundamental rights or freedoms.

Secondly, because we have your consent (i.e. agreement) to us processing your personal information. Under the UK GDPR, consent is a legal basis for processing personal information. You can withdraw your consent at any time.

Thirdly, an obligation under a contract to process/disclose the information, i.e. your tenancy agreement.

The other reasons we can rely upon to process your personal information under UK GDPR is where we need to protect the vital interests (i.e. the health and safety) of you or another person or because it is necessary to process the personal information to comply with a legal obligation.

Some personal information is treated as more sensitive (for example information about health, sexuality, ethnic background and others – see footnote below for a full list<sup>1</sup>). The legal basis for processing these special categories of personal information is more limited. To lawfully process special categories of personal data, we must identify a lawful basis for the processing and meet a separate condition for the processing. The bases we can use are:

- With your consent;
- Where we need to protect the vital interests (i.e. the health and safety) of you or another person and you are incapable of giving consent;
- Where you have already made your personal information public;
- Where we or another person needs to bring or defend legal claims; and/or
- Substantial public interest grounds.

To process personal data about criminal convictions or offences, we must have both a lawful basis for the processing and either legal authority or official authority for the processing.

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<sup>1</sup> Special categories of personal data is defined within the UK GDPR and covers racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a person's sex life or sexual orientation

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## Where this information comes from

Most information we hold will be collected from you but we may also collect information from third parties such as the local authority, your doctor (or other health professional), a previous landlord, property agents or other relevant community partner. In addition, we may also obtain information from publicly accessible sources or engage the service of market research organisations to validate, or where appropriate, enhance the information that we hold.

## Details of any change in circumstances

You are obliged to inform us of any changes in circumstances.

## Recorded data

To assist with personal security and prevention and detection of crime, we may capture your image on our CCTV systems if you visit an estate, office or community facility which is covered by this.

For further information please request a copy of our CCTV policy.

## Why we have to collect and process this information

We will only collect personal information from service users and tenants when we need this. The type of information we need from you will vary depending on our relationship with you. When we ask you for information, we will make it clear why we need it. We will also make it clear when you do not have to provide us with information and any consequences of not providing this.

Some of the reasons AIHA needs to process personal data in order to deliver our services to you:

- To assess an individual to provide appropriate services
- To prioritise and assess all applications and service eligibility
- To provide, manage and develop affordable housing
- To provide property management and property maintenance services
- To manage your tenancy or lease e.g. income collection, essential servicing, access for maintenance and improvements or to enforce the terms of your tenancy/lease
- In the provision and management of care and support services
- To market, sell and manage shared ownership homes
- To deliver on our ambition to 'transform lives and communities'
- To comply with our regulatory and legal obligations including but not exclusively to, the Care Quality Commission, Local Authorities, NHS, Health & Safety Executive
- To assess in assessment of eligibility for funding where grants and public funding is applied

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- To report on service performance where public funding or grant funding has been applied for
  - To reply to compliments and also investigate and respond to complaints
  - To contact you about services and any changes to the organisational structure
  - To understand how we're performing
  - For statistical analysis
  - To facilitate communication

We require this data so that we provide services to you. By law we need to have a lawful basis for processing your personal data, and we are required to do so to prevent fraud.

Where processing also concerns household members, it is in our legitimate interests to ensure that we are meeting the needs and expectations of all service users.

It is in our legitimate interests to understand how we are performing so we can meet our mission statement and objectives.

## Sharing information

AIHA may disclose personal data to third parties but only where it is necessary to comply with a legal obligation, or where permitted under Data Protection Legislation.

When we need to share personal data with our contractors, third party suppliers and business partners, our relationships are governed by our contracts with them which include strict data sharing and confidentiality protocols.

Some of the third parties we may share your information with include, Local Authorities, Social Workers, Safeguarding Teams, CQC, GPs and Hospitals, Clinical Commissioning Groups, Police and other law enforcement agencies, DWP, HMRC.

Where 'sharing' is in our 'legitimate business interests', we may share your information without seeking your consent first. This may be with:

- Our contractors to facilitate repairs, maintenance or improvement works
- Other organisations in the AIHA
- Debt and money management advisors
- Local authority teams such as housing, social services, environmental health and benefit agencies
- Utility companies (and their representatives) and Council Tax Departments to ensure billing details are correct
- Independent mortgage advisors and solicitors

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- Third parties providing services on our behalf. For example, a mailing company distributing our newsletter; a research company carrying out a customer satisfaction survey, or a debt collection agency pursuing former tenant arrears
  - Agencies committed to protecting public funds and/or preventing fraud in line with the National Fraud Initiative. More information can be found on the work undertaken by the Cabinet Office at: <https://www.gov.uk/government/collections/national-fraud-initiative>
  - Police and other relevant authorities (e.g. Department of Work & Pensions, Probation Service, HM Revenue and Customs) in relation to the prevention and detection of crime, the apprehension of offenders or the collection of tax or duty
  - Other statutory organisations e.g. social services, health authorities, Homes England, the Greater London Authority (GLA), the National Housing Federation, as necessary for exercising statutory functions
  - Referral of disputes to a Beth Din (Jewish Legal Court)

## Data Security

AIHA will apply appropriate technical and organisational measures to ensure your personal information is secure. For example, we have systems in place to ensure that access to personal information is restricted to authorised individuals on a strictly need-to-know basis.

AIHA will never sell your personal data to third party organisations for marketing purposes.

AIHA is committed to upholding your rights in respect of your personal data.

## Data Retention

AIHA only holds records during the period of our relationship and for a set period afterwards to allow us to meet our legal obligations including resolving any follow up issues between us.

We have a document retention schedule which sets out how long we keep different types of information for. This is based on National Housing Federation guidance, CQC regulations, legal requirements and best practice.

## Further Processing

If we wish to use your personal data for a new purpose, we will seek your prior consent to the new processing.

## Your Rights

You have a number of rights under the UK GDPR:

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### Access to personal information

Under the UK GDPR, you have a right to ask us what personal information we hold about you, and to request a copy of your information. This is known as a 'subject access request'. We will provide the information you have asked for without undue delay and within one month (unless extended). We may rely on an exemption to restrict disclosure of some information.

### Rectification

If you need us to correct any mistakes contained in the information we hold about you, you can let us know by contacting us on the details provided at the commencement of this notice.

### Erasure ('right to be forgotten')

You have the right to ask us to delete personal information we hold about you. You can do this where:

- the information is no longer necessary in relation to the purpose for which we originally collected/processed it
- where you withdraw consent
- where you object to the processing and there is no overriding legitimate interest for us continuing the processing
- where we unlawfully processed the information
- the personal information has to be erased in order to comply with a legal obligation

We can refuse to erase your personal information where the personal information is processed for any of the following reasons:

- to exercise the right of freedom of expression and information
- to enable functions designed to protect the public to be achieved e.g. government or regulatory functions
- to comply with a legal obligation or for the performance of a public interest task or exercise of official authority
- for public health purposes in the public interest
- archiving purposes in the public interest, scientific research historical research or statistical purposes
- the exercise or defence of legal claims
- where we have an overriding legitimate interest for continuing with the processing

### Restriction on processing

You have the right to require us to stop processing your personal information. When processing is restricted, we are allowed to store the information, but not do anything with it. You can do this where:



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- You challenge the accuracy of the information (we must restrict processing until we have verified its accuracy);
  - You challenge whether we have a legitimate interest in using the information;
  - If the processing is a breach of the UK GDPR or otherwise unlawful;
  - If we no longer need the personal data but you need the information to establish, exercise or defend a legal claim.

If we have disclosed your personal information to third parties, we must inform them about the restriction on processing, unless it is impossible or involves disproportionate effort to do so.

We must inform you when we decide to remove the restriction giving the reasons why.

### Objection to processing

You have the right to object to processing where we say it is in our legitimate business interests. We must stop using the information unless we can show there is a compelling legitimate reason for the processing, which override your interests and rights or the processing is necessary for us or someone else to bring or defend legal claims.

### Withdrawal of consent

You have the right to withdraw your consent to us processing your information at any time. If the basis on which we are using your personal information is your consent, then we must stop using the information. We can refuse if we can rely on another reason to process the information such as our legitimate interests.

### Right to data portability

The right to data portability allows you to obtain and reuse your personal data across different services. It allows us to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way. The right only applies to personal data you have provided to us where the reason we are relying on to use the information is either your consent or for the performance of a contract. It also only applies when processing is carried out by us using automated means.

To exercise any of the above rights, please write to the Data Protection Officer:

Mrs Chaya Spitz  
Agudas Israel Housing Association  
206 Lordship Road  
London N16 SES  
[Chaya.spitz@aihalted.co.uk](mailto:Chaya.spitz@aihalted.co.uk)

Include information to identify yourself, proof of identity and address and information to which your request relates.

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## Complaints

For independent advice about data protection, privacy, e-privacy and data sharing issues, you can contact the Information Commissioner. A lot of useful information is accessible on their website.

Information Commissioner  
Wycliffe House, Water Lane  
Wilmslow  
Cheshire SK9 SAF  
Phone: 0303 123 1113  
Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)  
Website: [www.ico.org.uk](http://www.ico.org.uk)

**Agudas Israel Housing Association**

206 Lordship Road, London N16 5ES

Tel: 020 8802 3819

reception@aihaltd.co.uk

**Housing**  
Ombudsman Service

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