

MB Housing Management Limited

Privacy Policy

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1. Introduction

1.1 MB Housing Management Limited (we, us, or our) was established to provide housing management and related functions to Housing Co-operatives (Co-operatives).

1.2 This policy aims to explain how we will collect, use, store and share personal information we collect whilst carrying out our role as the Managing Agent to the Co-operatives we manage.

1.3 The data we collect applies to tenants / co-operative members, residents, contractors, former tenants, household members, visitors, housing applicants and other individuals or organisations whose information we process in connection with our role.

1.4 We are committed to handling all personal information that we collect sensitively, fairly, lawfully and transparently and protecting it against loss, misuse or disclosure.

2. Personal Information

2.1 Personal information is information that alone or combined with other information may identify you. Under GDPR, personal data is defined as:

2.2 *"any information relating to an identified or identifiable natural person. This includes information that directly or indirectly identifies a person, such as names, identification numbers, location data, online identifiers, or even factors specific to their physical, physiological, genetic, mental, economic, cultural, or social identity".*

2.3 We do not consider personal information to include information that has been anonymised so that it does not allow you to be identified.

3. Responsibilities

3.1 **Data Controller** – Responsible for deciding why and how personal information is processed.

3.2 **Data Processor** – Responsible for processing the information.

3.3 At MB Housing, we act as the **Data Controller** when we process information to administer our own business, meet our legal obligations, maintain professional relationships with our clients, or deal with complaints.

3.4 We also act as a **Data Processor** on behalf of our client Co-operatives. As a processor, we will only process personal information in accordance with the Co-operative's instructions and our contractual obligations.

3.5 The dual responsibilities will always be set out in our service agreement with the Co-operative.

4. Information we collect

4.1 We will only collect information that we determine reasonably necessary for the purpose of our actions. Depending on the services we provide to the Co-operative, we may collect:

- ❖ Your name, household members names, contact details which may include your email address and telephone number and postal address.
- ❖ Dates of birth and other identifying information.
- ❖ Tenancy, occupancy and membership information.
- ❖ Rent and service charge, arrears and payment information.
- ❖ Information about household members.
- ❖ Bank details for as long as is necessary to process a payment or set up a direct debit.
- ❖ Information in relation to housing applications, allocations and eligibility
- ❖ Correspondence, complaints and records of communication.
- ❖ Information relating to housing management including but not limited to anti-social behaviour, tenancy breaches and all other housing management matters.
- ❖ Information about repairs and maintenance carried out, inspections and access to properties.

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- ❖ Information provided to us through contractors, local authorities, support agencies and other relevant agencies.
 - ❖ Photographs and CCTV images where applicable to the function being carried out.
 - ❖ Information to deal with legal proceedings or disputes.

5. Special categories

5.1 There may be times when delivering a housing management function that we process information that has additional protection under data protection law. This may include information relating to your:

- ❖ Race or ethnic origin
- ❖ Sexual orientation
- ❖ Physical or mental health
- ❖ Disability or support needs
- ❖ Religious or philosophical beliefs
- ❖ Biometric information (where applicable)

5.2 We will only process this type of information where there is a lawful reason to do so, and, where required, an additional legal condition for processing.

5.3 When processing sensitive information, we will limit access to only those who need it as part of their role within our organisation to deliver the service as stipulated in our service agreement.

6. Obtaining your information

6.1 There are numerous ways that we may collect your information ranging from; correspondence and emails, telephone calls, online services, your landlord, previous managing agent, local authority and contractors.

6.2 Other ways of collecting information less frequently is through legal representatives, publicly available sources when legal and proportionate to do so, public bodies, support agencies or other organisations involved in housing related services.

6.3 In cases where we obtain personal information from a source not listed at 6.1 or 6.2, we will provide information where required to do so by law.

6.4 We will adopt the Information Commissioners Office (ICO) requirements of providing the information within a reasonable period and no later than one month, subject to applicable extensions.

7. Why we use your information

7.1 We will only use your information for the purposes of fulfilling our contractual obligations under the terms of the service agreement with the Co-operative.

8. Legal

8.1 We will only process personal information where we have a legal basis under applicable data protection legislation.

9. Sharing your personal information

9.1 We will only share your personal information where it is relevant and necessary for the particular purpose.

9.2 We may share your information with:

- ❖ Officers of your committee or the management committee members where there is a lawful basis for doing so, whilst considering confidentiality, data protection rights and individual circumstances
- ❖ Tenants or members where disclosure is necessary and appropriate – eg, in connection with Co-operative Governance.
- ❖ Contractors and maintenance companies
- ❖ Insurers and claim handlers
- ❖ Professional advisors

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- ❖ Local authorities and other public bodies
 - ❖ Courts and Tribunals
 - ❖ Debt recovery agents for former tenants or where appropriate
 - ❖ Support agencies and safeguarding agencies where appropriate
 - ❖ IT, Communications, document management and other service providers where disclosure is otherwise lawful

9.3 We will never in any circumstance sell your personal information.

10. Contractors and other organisations

10.1 There will be times when we appoint external organisations to provide services such as IT, repairs and maintenance, communications, document storage, legal services and accounting.

10.2 Where an external organisation processes personal information on our behalf, we will take the appropriate steps to ensure that it is contractually required to protect the information and only use it for authorised purposes.

11. Information security

11.1 MB Housing uses appropriate technical and organisational measures to protect personal information and access to personal information is restricted to people who need it for legitimate work purposes.

11.2 We achieve this by:

- ❖ Having password and authentication controls
- ❖ Secure storage
- ❖ Secure disposal of information
- ❖ Encryption where appropriate
- ❖ Staff training that includes confidentiality requirements
- ❖ Backup and recovery procedures
- ❖ Identifying and responding to data breaches

11.3 We know that no method of transmitting or storing information is completely risk-free, but we are committed to taking reasonable and proportionate measures to reduce the risk.

12. Storing information

12.1 We will not retain personal information for longer than is reasonably necessary for the purpose of which it was collected.

12.2 We will maintain appropriate retention arrangements and securely delete or destroy information when it is no longer required, or at the end of a contract with a client co-operative following handover.

13. Accessing your rights

13.1 Under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, tenants have explicit data protection rights regarding how landlords collect, store, and use their personal information.

13.2 The table below shows your Core rights:

Right	Information
To be informed	Your landlord must have provided you with a clear privacy notice explaining what personal data is collected (e.g., names, IDs, financial details, references), why it is used, and who it is shared with.
Of Access (DSAR)	You can make a Data Subject Access Request to see all personal information a landlord or agent holds about you. Your landlord will generally have one calendar month to supply this data free of charge.
To rectification	You can ask your landlord to correct any inaccurate or incomplete personal records, such as wrong contact details or erroneous rent arrears history.
To erase	You can request the deletion or removal of your personal data when there is no longer a compelling legal reason or legitimate business need for your landlord to keep it (e.g., after a reasonable post-tenancy retention period).
To restrict or object	You can object to certain types of data processing, such as direct marketing or inappropriate sharing of details with third parties like utility companies.

14. How to exercise your rights

14.1 To exercise your rights, please contact:

Ashleigh Martin – Head of Housing and Governance
MB Housing Management Limited
enquiries@mbhousing.uk
167-169 Great Portland Street, Fifth Floor, London W1W 5PF
020 3924 2810

14.2 When you contact us, please provide sufficient information so that we can identify you and understand your request.

14.3 If we are processing your information on behalf of your landlord, we may need to refer your request to them, or work with them to respond depending on the processing arrangement.

15. Complaints

15.1 If you have concerns, or you are unhappy with the way in which we have handled your personal information, please contact us using the details provided at 14.1 of this policy.

15.2 You have the right to take your complaint to the ICO if you believe that your information has been handled unlawfully.

15.3 You can contact the ICO in the following ways:

- ❖ In writing to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
- ❖ By telephone: 03303 123 1113
- ❖ Online at: <https://ico.org.uk/>

16. Data Breaches

16.1 If we become aware of a personal data breach, we will carry out an assessment and take appropriate steps to contain, investigate and remedy it.

16.2 Where we are required to do so by law, we will notify the ICO and / or the affected individuals within the applicable timeframes.

16.3 In our capacity as a data processor for the Co-operative, we will notify them of any breaches in accordance with our contractual and legal obligations so that it can take any appropriate action in accordance with its data controller requirements.

17. Changes to this policy

17.1 We will review this policy annually or sooner to reflect changes in our services, legal requirements or the way we process personal information.