

Southward Housing Co-operative – Privacy Notice – July 26

1. Who We Are

Southward Housing Co-operative (“the Co-operative”, “we”, “us”) is your landlord and the **Data Controller** for the personal data we collect and use.

Contact details:

Data Controller
Southward Housing Co-operative
3 Lydden Grove, Wandsworth, London SW18 4LJ

Email: admin@southwardhousing.co.uk
Telephone: 07907 631 333

We are not required to appoint a Data Protection Officer. However, you may contact us using the details above for any data-protection queries.

2. What Personal Data We Collect

We collect and process the following categories of personal data so we can operate as your landlord:

2.1 Standard Personal Data

- Names, titles, aliases
- Contact details (address, telephone numbers, email addresses)
- Date of birth, age, gender, nationality
- Household composition, dependants
- Tenancy records, rent account information
- Correspondence with the Co-operative

2.2 Special Category Data (Sensitive Data)

We may process:

- Racial or ethnic origin
- Religious or philosophical beliefs
- Health information (mental or physical)
- Information relating to vulnerabilities or support needs

We only collect this where necessary and with an appropriate legal basis.

3. How We Obtain Your Data

We collect data:

- Directly from you (application forms, correspondence, meetings)
- From third parties where necessary, such as:
 - Local authorities
 - Managing agents
 - Support services
 - Contractors
 - Utility providers
 - Legal representatives

We will always tell you if we obtain information from another source unless legally restricted.

4. Why We Use Your Data (Purposes of Processing)

We use your personal data to:

- Manage your tenancy and provide landlord services
- Maintain properties and arrange repairs
- Communicate with you by post, email, phone or text
- Manage rent accounts, arrears and payments
- Meet legal and regulatory obligations
- Ensure health, safety and safeguarding
- Monitor equality and diversity
- Maintain Co-operative governance and administration
- Handle complaints, disputes and legal claims

5. Our Lawful Bases for Processing (Article 6 UK GDPR)

We process your personal data under the following lawful bases:

- **Contract** – to manage your tenancy agreement
- **Legal obligation** – compliance with housing, safety, financial and regulatory laws
- **Legitimate interests** – ensuring efficient administration, property management and service delivery
- **Consent** – only where we rely on your explicit agreement (e.g., certain special-category data)

Where legitimate interests are used, we ensure they do not override your rights.

6. Lawful Basis for Special Category Data (Article 9 UK GDPR)

We process special-category data only when one of the following applies:

- **Explicit consent**
- **Substantial public interest**, including equality monitoring and safeguarding
- **Legal claims**
- **Vital interests**, where you are unable to give consent

We will always explain why such data is needed.

7. Who We Share Your Data With

We may share your data with trusted third parties when necessary:

- Local authorities
- Managing agents
- Contractors and maintenance providers
- Utility companies
- Legal advisers
- Housing regulators
- Financial Conduct Authority (where relevant)

All third parties must keep your data secure and use it only for the purpose we specify.

We do **not** sell your data.

8. International Transfers

We do **not** transfer your personal data outside the UK.

If this ever changes, we will inform you and ensure appropriate safeguards are in place.

9. Automated Decision-Making and AI

We do **not** use automated decision-making or AI systems that produce legal or significant effects on you.

If this changes, we will provide a separate notice explaining the logic involved and your rights.

10. How Long We Keep Your Data

We keep your data only for as long as necessary:

- **During your tenancy** – all relevant tenancy and contact information
- **After tenancy ends** – only where legally required or where rent arrears or disputes remain
- **Statutory records** – retained permanently where required by law

We apply secure deletion and retention schedules in line with ICO guidance.

11. Your Rights

You have the following rights under UK GDPR:

- **Right of access** – to request copies of your personal data
- **Right to rectification** – to correct inaccurate or incomplete data
- **Right to erasure** – to request deletion where data is no longer needed
- **Right to restrict processing** – to limit how your data is used
- **Right to object** – to certain types of processing
- **Right to data portability** – to request transfer of your data to another provider
- **Right to withdraw consent** – where consent is the lawful basis

We will respond within **one month**.

12. How to Make a Complaint

12.1 Complaints to Us

If you have concerns about how we handle your data, please contact us first:

Email: admin@southwardhousing.co.uk

Address: Data Controller, Southward Housing Co-operative, 3 Lydden Grove Wandsworth London, SW18 4LJ

We will follow our internal data-protection complaints procedure and respond promptly.

12.2 Complaints to the ICO

If you remain dissatisfied, you can contact the Information Commissioner's Office:

Website: <https://ico.org.uk>

Telephone: 0303 123 1113

Address: ICO, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

13. Changes to This Privacy Notice

We review this notice regularly and will inform you of any significant updates.

14. Contact Us

For any questions about this notice or your personal data, contact:

The Data Controller

Southward Housing Co-operative, 3 Lydden Grove Wandsworth London, SW18 4LJ