

Customers living in supported, sheltered or extra care housing accommodation

This privacy information should be read alongside our customers and members of the public privacy notice.

To deliver services to LiveWest's customers in an effective and efficient way, and to meet obligations as a landlord, LiveWest will collect and use customer data. The lawful basis for this processing is:

- Contract
- Legitimate interest
- Legal obligation
- Vital interests
- Consent

(Descriptions of the lawful basis can be found in our customer privacy notice)

How does LiveWest collect customer data?

LiveWest may collect customer information

- As part of the lettings process
- When a customer makes contact with a member of staff
- As part of the housing management process, including the management of rent accounts
- As part of a support plan to meet support needs. This includes customer support history
- From third party organisations working on the customers behalf
- From feedback provided during customer research
- CCTV installed at LiveWest schemes
- Family members or representatives, where LiveWest has permission to do so

This is not an exhaustive list, and LiveWest may collect data from additional sources if legally allowed to do so.

What types of information does LiveWest hold?

LiveWest will hold different types of data depending on the customer/organisation relationship. Examples of the data that LiveWest hold are:

- Basic personal data such as name, address, and date of birth
- Customer contact details
- Equality and diversity information*
- Information to help LiveWest provide services to its customers such as support needs or health conditions*
- Contact details for support services that maybe working with the customer
- Information relating to customer rent accounts including copies of benefits documents
- Photographs or images on CCTV Footage
- Feedback provided via customer research
- Support plans including support and housing history*
- Next of kin or emergency contact details

* Special category data. Please see the customers and members of the public privacy notice for information relating to special category data.

This is not meant to be an exhaustive list. On occasions it may be necessary to collect additional information to help LiveWest meet customer support needs.

Sharing personal data

To manage customer housing needs and meet obligations as a landlord, LiveWest are required to share certain information with third party organisations. These could include:

- Discussing financial situations, including rent payments or welfare benefits with the housing benefit department.
- Providing information such as name, address, contact details and limited information regarding tenancy flags, to ensure the health and safety of LiveWest contractors. This includes providing this information, where relevant, with out of hours teams.
- Debt recovery agencies should the customer default on the tenancy conditions, to enable the recovery of debt relating to rent arrears.
- Regulators, auditors and other organisations where legally allowed to do so.
- Sharing information with LiveWest partners that work within our communities, such as the police to ensure tenancy conditions are met, and to prevent and detect crime.
- Agencies that contact LiveWest on the customers behalf, such as Councillors or MP's, this is done based on implied consent, unless the disclosure of special category data is necessary, where LiveWest would gain the customers explicit consent.
- CCTV footage taken on LiveWest CCTV systems may be shared with third party organisations such as the police, and local authorities, when it is legal to do so.
- Third party contractors who carry out research on behalf of LiveWest.

- Local authorities if there are safeguarding concerns about the customer.
- Other landlords who request tenancy references as part of the moving out process.
- With LiveWest legal representatives.
- Other agencies to meet regulatory requirements set out by the social housing regulator or other relevant regulations or laws.
- In connection with legal proceedings.
- Partner organisations who provide support and assistance in helping to meet customer support needs. Within sheltered housing schemes, this could include sharing information with lifeline services*

* Special category data. Please see the customers and members of the public privacy notice for information relating to special category data.

This is not an exhaustive list and there will be occasions where LiveWest shares data when legally allowed to do so.

CCTV and photographs

At some LiveWest sites there are CCTV systems installed. LiveWest staff do not constantly monitor CCTV, they are installed to provide evidence of any incidents, and will only view footage in these circumstances. Only specified members of staff, which can also include out of hours staff employed by third party organisations, can view the footage. When appropriate, CCTV footage can be shared with the police for the purpose of detection and prevention of crime or for the apprehension of an offender.

At some sites LiveWest may ask for a photograph of each customer. This is solely for the purpose of site security. The photograph is stored securely and can only be viewed by specified members of staff. This can also include out of hours staff employed by third party organisations. The photograph will only be viewed if it is necessary to identify a customer residing at the premises out of normal office hours or if there are concerns about customer health and safety and are required to share it with emergency services.

How long do we keep your data?

Provided there is no ongoing contact between the customer and LiveWest, such as the collection of rent arrears when the customer moves out, LiveWest will retain the information for six years. After six years, the information will be deleted or securely destroyed.

If there is ongoing contact following the end of a customers tenancy, data will be retained for six years after last contact.

Any support plans will be retained for one year following the end of support, after which point, they will be deleted or securely destroyed.

LiveWest are required to keep some information, to prove that a customer held a tenancy, if

required to do so in the future.