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|---------------|----------------------------|------------------------------------------------------------------------------------|
| Policy Name:  | <b>AHCL PRIVACY NOTICE</b> |  |
| Version       | <b>001</b>                 |                                                                                    |
| Reviewed Date | May 2026                   |                                                                                    |

## 1. Who we are

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Affordable Housing and Communities Ltd (AHCL) is a registered provider of social housing, regulated by the Regulator of Social Housing (RSH). We provide affordable rented homes and manage housing services for our residents.

AHCL is registered as a data controller with the Information Commissioner's Office (ICO).

**ICO Registration Number: ZB257337**

**Registered address:** Affordable Housing and Communities Ltd, Tringham House  
Deansleigh Road, Bournemouth, Dorset, BH7 7DT

**Data Protection Officer:** Grace Robinson [gl@ahh.org.uk](mailto:gl@ahh.org.uk) | 01202 531 635

## 2. Who this notice applies to

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This privacy notice applies to you if you are:

- a current or former resident or tenant of AHCL
- an applicant for social housing managed or allocated by AHCL
- a shared ownership leaseholder or applicant
- a member of a resident's household or someone named on a tenancy
- a visitor to our offices, website or communal areas
- someone who contacts us by phone, email, letter or social media

A separate privacy notice applies to employees, contractors and board members (Employee Privacy Notice). A separate notice applies to Platinum Skies retirement living customers.

### 3. What information we collect

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#### 3.1 Standard personal information

We may collect and hold the following about you:

- full name, date of birth and identity documents
- contact details – address, telephone number, email address
- National Insurance number
- household composition and details of people living with you
- income, employment and financial information (for eligibility and arrears management)
- tenancy or lease details, including rent and service charge accounts
- records of repairs, maintenance requests and property inspections
- correspondence and records of contact with us
- complaints, feedback and survey responses
- CCTV images where cameras are in use on our estates

#### 3.2 Special category (sensitive) data

We may also hold sensitive data about you where it is necessary to provide appropriate services. This includes information about:

- health or disability – to tailor our services, arrange adaptations or assess housing needs
- mental health or vulnerabilities – where relevant to tenancy support or safeguarding
- racial or ethnic origin – for equality monitoring
- alleged or actual criminal offences – where relevant to anti-social behaviour cases

We handle special category data with extra care under UK GDPR Article 9 and will only process it where there is a clear legal basis.

## 4. Why we use your information and our lawful basis

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Under UK GDPR we must have a lawful basis for processing your personal data. The table below sets out the main purposes for which we use your information and the basis we rely on.

| Purpose                                                            | Lawful Basis                                                           |
|--------------------------------------------------------------------|------------------------------------------------------------------------|
| Processing housing applications and allocations                    | Legal obligation (Art. 6c); Public task (Art. 6e)                      |
| Managing your tenancy or lease, including rent and service charges | Contract (Art. 6b)                                                     |
| Carrying out repairs, maintenance and property inspections         | Contract (Art. 6b); Legal obligation (Art. 6c)                         |
| Managing rent arrears and service charge debts                     | Contract (Art. 6b); Legitimate interests (Art. 6f)                     |
| Investigating and responding to anti-social behaviour              | Legal obligation (Art. 6c); Public task (Art. 6e)                      |
| Safeguarding residents, including children and vulnerable adults   | Legal obligation (Art. 6c); Vital interests (Art. 6d)                  |
| Neighbourhood and estate management                                | Legitimate interests (Art. 6f)                                         |
| Responding to complaints and enquiries                             | Legal obligation (Art. 6c); Legitimate interests (Art. 6f)             |
| Providing tenancy support and floating support services            | Contract (Art. 6b); Consent (Art. 6a) where required                   |
| Preventing and detecting fraud, money laundering and crime         | Legal obligation (Art. 6c)                                             |
| Meeting obligations to the RSH, Homes England and other regulators | Legal obligation (Art. 6c)                                             |
| Meeting obligations to lenders and funders                         | Legal obligation (Art. 6c)                                             |
| Equality monitoring and diversity reporting                        | Legal obligation (Art. 6c); Substantial public interest (Art. 9(2)(g)) |
| Statistical analysis and service improvement                       | Legitimate interests (Art. 6f)                                         |

## 5. Who we share your information with

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We only share your information where there is a lawful basis to do so. We may share your information with:

- contractors carrying out repairs, maintenance or other services on our behalf – bound by data processing agreements
- local authorities – for housing registers, council tax, and support referrals
- the Regulator of Social Housing (RSH) and Homes England – as required by our regulatory obligations
- our lenders and funders – where required under loan covenants
- the police and law enforcement agencies – to prevent or detect crime or protect public safety
- social services and safeguarding authorities – where there is a safeguarding concern
- debt collection and legal services – in cases of unresolved arrears or legal proceedings
- utility companies and Council Tax offices – when you move in or out
- our external auditors and the ICO – for audit and compliance purposes
- IT and cloud hosting providers – who process data on our behalf under strict contractual controls

We do not sell your personal information. We do not share it for marketing purposes without your explicit consent. AHCL and its service providers are based in the UK and we do not routinely transfer your data outside the UK.

## 6. How long we keep your information

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We only keep your information for as long as it is needed, in line with our Data Retention Policy. As a guide, we will usually keep:

| Type of record                             | Typical retention period                            |
|--------------------------------------------|-----------------------------------------------------|
| Housing application records (unsuccessful) | 2 years from decision                               |
| Tenancy file and related correspondence    | 6 years from end of tenancy                         |
| Rent account records                       | 6 years from end of tenancy                         |
| Repairs and maintenance records            | 6 years from completion                             |
| ASB case records                           | 6 years from case closure                           |
| Safeguarding records                       | As directed by statutory guidance; may be permanent |
| Complaints records                         | 6 years from resolution                             |

|                                       |                                           |
|---------------------------------------|-------------------------------------------|
| Legal proceedings and court orders    | 12 years from conclusion                  |
| CCTV footage (where applicable)       | 31 days unless required for investigation |
| Equality monitoring data (anonymised) | Indefinitely in anonymised form           |

## 7. How we keep your information safe

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- Personal data is stored in secure IT systems with access controls, accessible only to staff who need it.
- Paper records are held in secure, locked environments.
- All staff with access to personal data receive data protection training and are bound by confidentiality obligations.
- We use encryption for data in transit and at rest.
- Any data processors acting on our behalf are required by contract to maintain equivalent security standards.
- We will notify the ICO within 72 hours of becoming aware of a serious data breach, and will notify affected individuals where required.

## 8. Your data protection rights

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Under UK GDPR you have the following rights. Contact us using the details in section 9 to exercise any of them. We will not charge you and must respond within one month.

| Right                        | What it means                                                                                                  |
|------------------------------|----------------------------------------------------------------------------------------------------------------|
| Right to be informed         | To know how and why we process your personal data – this notice fulfils that obligation.                       |
| Right of access (DSAR)       | To request a copy of the personal data we hold about you.                                                      |
| Right to rectification       | To ask us to correct inaccurate or incomplete data.                                                            |
| Right to erasure             | To ask us to delete your data in certain circumstances (we may have legal obligations to retain some records). |
| Right to restrict processing | To ask us to pause processing your data in certain circumstances.                                              |
| Right to data portability    | To receive your data in a portable format in certain circumstances.                                            |
| Right to object              | To object to processing based on legitimate interests or for direct marketing.                                 |

|                               |                                                                                                     |
|-------------------------------|-----------------------------------------------------------------------------------------------------|
| Rights re automated decisions | Not to be subject to solely automated decisions that significantly affect you without human review. |
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## 9. How to contact us

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To exercise your rights, make a Subject Access Request, ask a question about how we use your data, or report a concern, please contact our Data Protection Officer:

**Data Protection Officer:** Grace Robinson

**Email:** [gl@ahh.org.uk](mailto:gl@ahh.org.uk)

**Telephone:** 01202 531 635

**Post:** Data Protection Officer, Affordable Housing and Communities Ltd, Tringham House Deansleigh Road, Bournemouth, Dorset, BH7 7DT

## 10. Your right to complain to the ICO

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If you are not satisfied with how we have handled your personal information, you have the right to complain to the ICO – the UK's data protection regulator. We would welcome the opportunity to resolve any concern directly first, so please contact us before approaching the ICO.

**Website:** [www.ico.org.uk/make-a-complaint](http://www.ico.org.uk/make-a-complaint)

**Telephone:** 0303 123 1113

**Post:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

## 11. Changes to this notice

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We may update this notice from time to time. If we make significant changes, we will notify residents by letter, email or by posting a notice in our communal areas and on our website. The current version is always available on request.

**Last updated:** May 2026 | Version 001

## Version History

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| Version | Date     | Author         | Sections Updated | Principal Changes                                                                                                          |
|---------|----------|----------------|------------------|----------------------------------------------------------------------------------------------------------------------------|
| 001     | May 2026 | Grace Robinson | All              | New document – full rewrite of AHH Group Privacy Notice as AHCL-specific social housing privacy notice, aligned to UK GDPR |
|         |          |                |                  |                                                                                                                            |