Registered office: Bradmere House, Brook Way, Leatherhead, Surrey KT22 7NA
www.transformhousing.org.uk | info@transformhousing.org.uk
Registered charity: 264133 | **Company limited by guarantee registered in England and Wales:** 01057984
Registered provider of social housing: H2452 | **Registered with Ofsted**: 2791302

Privacy Notice: Clients and Visitors

Who are we?

Transform Housing & Support is committed to protecting the privacy and security of your personal information. In this notice, whenever you see the words 'we,' 'us,' 'our,' or 'Transform," it refers to Transform Housing & Support.

Any personal data we collect about you will be strictly in accordance with UK Data Protection Legislation (including the UK General Data Protection Regulation (UK GDPR), tailored by the Data Protection Act 2018). As a data controller we are responsible for deciding how we hold and use personal information about you.

This privacy notice tells you what to expect when we collect and store personal and sensitive information. It tells you about the purposes for which we will process your personal information and the legal basis for the processing ('processing' includes us keeping your personal information).

Please find below our registration numbers:

- ICO registration number: ZA 1600063;
- Registration charity number: 264133;
- Company limited by guarantee registered in England and Wales: 01057984;
- Registered provider of social housing: H2452;
- Registered with Ofsted: 2791302

Who the personal data relates to

We collect and hold personal information about:

- **Clients** – This includes current, former and potential clients who live in our properties or access our support and other services and includes members of their family and people associated with them.

- **Visitors** – Visitors to our website and our offices, those who email, call, message us via a social media application or write to us, including anyone who makes a complaint or enquiry to Transform.

Are you required to provide personal information?

The personal data we request from you is necessary for us to provide our services, fulfil our contractual obligations, and comply with applicable legal and regulatory requirements.

Where personal data is required to enter into or perform a contract with you, failure to provide the requested information may prevent us from delivering the relevant services or fulfilling our obligations. In some cases, we are required by law to collect certain personal data. Where the provision of personal data is optional, we will make this clear at the point of collection.

What type of personal data is collected?

The personal information we collect will depend on our relationship with you and the services we are providing. We will only collect the information necessary to fulfil our obligations to you and in accordance with the legal bases set out below.

Clients

When you apply to become a Transform client, we obtain information to determine your housing needs.

You will provide us with information through your referral form. We will also use information from third parties such as other housing providers/private landlords, local authorities, appropriate to help us to assess your application.

We may collect the following personal data from you:

- Name and contact details (including email, telephone numbers and your current, previous and forwarding addresses).
- Identification information (including your date of birth and gender).
- Family details (including next of kin and marital status).
- Financial information (including your income, welfare benefit entitlements and bank account details).
- National identifiers (including National Insurance, social security number, passport or driving licence number).
- Online identifiers (including IP address or cookies).
- Device identifiers (for example identifiers for a smartphone).
- Signature and /or photographic identification.
- Photographs, CCTV images, films and telephone recordings.
- Whistleblowing (confidential reporting) information.
- We may also need additional information from you concerning:

Disabilities or vulnerabilities – We use this information to tailor our service to better meet your needs. We may also use this information for safeguarding of colleagues or clients.

Health information – to provide housing related support services.

Financial information – In order to ensure that arrears payments are settled quickly, we may collect additional information to help us to work out a payment plan with you. In addition, to provide welfare, benefits and budgeting advice as a free service to help you budget, pay your bills, or to apply for funding on your behalf.

Identification – Photo ID, bank statements, payslips or income details may be used to evidence your right to rent and to provide budgeting advice and information to ensure you are able to pay your rent and maintain your accommodation.

We will record information whenever you contact us or use our services and we will note any action taken, for example logging repairs, and feedback from our contractors about appointments with you, so that we have a record of what happened and of our contact with you. We minimise collection and use of sensitive information, however, given the services we provide, there are times when we use it to understand our clients and their needs better, such as providing accommodation for clients with disabilities or when dealing with neighbourhood disputes involving alleged criminal activity.

We will usually be processing this information to allow us to comply with our legal obligations, act in the substantial public interest or protect your vital interest in relation to the services we provide, to provide you with support, or to deal with any legal action. If we do not hold this information, we may not be able to provide all our services to you.

Visitors

We will keep a record of your contact with us, whether by phone, email, or in person. This may include CCTV images, logs of calls to our colleagues or, any requests or conversations that took place with us.

For visitors to the website, in order for our website to work correctly, we automatically collect the following information:

- Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, make and model, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform and if you access our website via your mobile device we will collect your unique phone identifier.

- Information about your visit, including, but not limited to the full Uniform Resource Locators (URL) and query string, clickstream to, through and from our website (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as but not limited to scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number and the terms that you use to search our website.

For further information, please contact us. Details are available later in this document.

CCTV

Some of our sites have CCTV in place to help protect colleagues, clients, our visitors, and our properties. CCTV will only be viewed when necessary (e.g. to detect or prevent crime) and footage is stored for a set period of time after which it is recorded over. Signage is in place to inform people that cameras are in operation. Access to our recorded CCTV footage is limited to those with the appropriate training and security clearance.

Further details are available in the **CCTV policy**.

Photographs and Videos

We may take photographs and record videos at our events, properties and within our communities for general marketing and publicity purposes. We will always seek appropriate consent before taking, recording or using any photographs or videos.

How we use your personal data

Your personal data will be collected and used to help us deliver activities or services or to complete a task raised at your request.

What we do with your information will depend on the nature of our relationship with you and how you interact with our various services and website.

Enter into, or manage any contract we have with you under Article 6 (1) (b) UK GDPR:

- Processing applications and requests for, but not limited to, rental accommodation;
- Managing tenancies including collecting rent and service charges;
- Ensuring compliance with the conditions of any agreement between us;
- Providing repairs, maintenance and adaptions at our properties;
- Provide support for elderly and vulnerable customers.

Comply with our legal and regulatory obligations, and acting in the public interest (Article 6 (1) (e) UK GDPR), such as:

- Preventing and detect crime and resolve disputes;
- Preventing and detect fraud and money laundering;
- Promoting safety and the quiet enjoyment of our neighbourhoods and communities;
- Promoting equal opportunities and fair treatment for all our clients;
- Meeting the obligations we owe to our funders and regulators.

Provide you with services and benefits in both our legitimate interests (Article 6 (1) (f) UK GDPR)

- Monitor, analyse, deliver and improve our services to you and home members.
- Ensure the proper management of your tenancy and give you appropriate support where needed.
- Assist you in the management of account charges, payments and arrears

- Provide information about support or services to allow you to better manage your home.
- Respond to your enquiries, keep in touch with you to understand your needs and preferences
- Promote our products and services and invite you to events.

Children's personal data

We do not usually process data on children aged under 18 who live in our properties, as all our clients are adults.

Where our clients are aged 16 and 17 and are looked after children or care leavers we will hold the same information as for all clients. As part of our responsibilities under OFSTED, we will also hold details of next of kin, authorised addresses, education and learning establishments, health issues and any incidents or accidents.

Where children in our accommodation are not our primary client, we retain the responsibilities of a landlord and also have a duty to safeguard children. Information collected will be used for those purposes. We record children's basic information if they are resident in one of our properties, including their name and date of birth. This is required for checking the property is not overcrowded and to assess other tenancy management issues where all householders and ages are required to be known.

We may also receive children's information if we are involved in the housing and tenancy aspects of a welfare case as part of a multi-agency working solution.

How we share your personal data

During the course of our business, we will restrict disclosure of personal information to limited individuals (i.e. relevant colleagues, insurers, professional advisors, agents, solicitors, suppliers or contractors) and we may disclose your personal data where we are required under a legal obligation – for instance, in certain circumstances we may be required to provide information about housing benefits to a local authority or central government department – and/or we believe it is in your interest to do so

Where we share data with a third-party organisation or statutory agency, we will ensure that the organisation or agency understands how the data is to be used, what information is to be shared and when it will be destroyed. We may provide more detailed information to you about any data sharing that takes place, or you can ask us for more information about it.

Our colleagues are trained in data protection and know the importance of keeping your data safe and secure.

The list overleaf sets out specific examples of where we may share your information, but this is not an exhaustive list:

Public authorities such as	Organisations not designated as public authorities, such as
■ The emergency services – fire service, police, ambulance and NHS ■ Local authorities (including the police and children's services) ■ The Home Office, Department for Work and Pensions (DWP) and Her Majesty's Revenue and Customs (HMRC), Ministry of Housing, Communities and Local Government (MHCLG). ■ Department of Energy Security & Net Zero (DESNZ) ■ Housing Ombudsman ■ Some academic institutions ■ Members of Parliament and Councillors ■ The courts ■ The Information Commissioner's Office ■ Other Regulatory Authorities including the Regulator for Social Housing, the Charities Commission, OFSTED, the Fundraising Regulator and Companies House	■ Specialist care provider organisations and charities ■ Utility providers ■ Interpretation services ■ Insurance services, solicitors, auditors, and consultants ■ Maintenance companies in a contract with us ■ Credit reference agencies ■ Medical professionals ■ Other housing providers and landlords

We do not sell or provide your personal information to other organisations for their marketing purposes.

We will not share your personal information with anyone who claims to represent you unless we are satisfied that you have appointed them or they act in some recognised official capacity.

International data transfers

Your personal data may be transferred outside the UK. We will ensure that all international transfers comply with applicable data protection laws by implementing appropriate safeguards in compliance with Chapter V UK GDPR.

For example, when we appoint data processors and personal data is transferred internationally, this will be limited to approved countries that have met the Data Protection Test, or other

appropriate safeguards such as, binding corporate rules, international data transfer agreements, standard contractual clauses, or other permitted mechanism.

The restricted transfers we make include transferring personal data to the EU (Germany and Ireland), New Zealand, and the US under the UK extension of the EU:US Data Privacy Framework and/or standard contractual clauses. Further information about the safeguards related to the international transfers we make can be provided on request. Please contact us using the details below.

How long we keep your personal data

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We will usually keep:

- Any application for accommodation for 6 years following acceptance of the offer of accommodation.
- Information on your tenancy file for 6 years following the end of your tenancy with us.
- Support plans and related documents permanently, or until transferred to a subsequent provider.
- Call logs and voice mail messages for 6 months, CCTV video footage 30 days unless the footage is being used to investigate an alleged crime or incident in which case it may be retained for up to 2 years following the conclusion of any investigation or legal action.

We may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes. In some circumstances, you can ask us to delete your personal data. Please see below for more information about your right to erasure.

Details of retention periods for different aspects of your personal information are available in our retention policy.

Your rights

Under UK data protection law, you have rights including:

- **Your right of access** - You have the right to ask us for copies of your personal information.

- **Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.
- **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- **Your right to object to processing** - You have the right to object to the processing of your personal information in certain circumstances.
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.
- **Your right to withdraw consent** - If the lawful basis for processing is consent, you have the right to withdraw that consent at any time. Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent, and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain services to you.
- **Your right to object to direct marketing** – If we use your personal data for direct marketing, you have the right to object at any time. This includes any profiling connected to that marketing. Where permitted by the Data Use and Access Act, Transform Housing may use the soft opt-in rules for charities to contact you about fundraising, promotional activities, or other charitable purposes where this is in our legitimate interests.

You also have the **right to object** to and not to be subject to a decision based solely on automated processing including profiling. We do not carry out automated processing or profiling. **To exercise any of these rights, please contact us using the contact details further in this document.**

Making a complaint

If you are concerned about how your personal data is being used, you have the right to make a complaint to us as the data controller in the first instance. We will investigate your complaint and respond to you as soon as possible.

If you remain dissatisfied with our response, or if you believe that we are processing your personal data in a way that does not comply with data protection legislation, you have the right to make a complaint to the Information Commissioners Office (ICO).

Information Commissioners Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

Telephone: 0303 123 1113
Website: **www.ico.org.uk/concerns**

Use of cookies

Like many websites, our website uses cookies. ‘Cookies’ are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow the website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. Navigate to our **Cookie Policy page** to manage your consent preferences and to understand more about how we collect and store cookies.

Links to other websites

Our website may contain links to other websites run by other organisations. This privacy notice applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies of other sites (even if you access them using links found on our site).

Changes to our privacy policy

We may update this Privacy Notice from time to time by posting an amended version on our website. If at any time we decide to use your personal data in a different manner than was stated at the time it was collected, we will notify you directly via email.

Our contact details

If you have any questions in relation to this document or how we use your personal data they should be sent to:

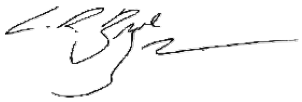
Bradmere House, Brook Way, Leatherhead, Surrey KT22 7NA	**01372 387 100**
gdprinfo@transformhousing.org.uk	Contact us | Transform Housing & Support

Our **Data Protection, Performance & Project Manager, Georgie Brazier**, can be contacted on **01372 387174**

Data Protection Officer

We are supported in our compliance with, and management of, data protection matters by:

Data Protection People Limited
The Tannery, 91 Kirkstall Road
Leeds LS3 1HS
Tel: 0113 869 1250

Signature: 

Date: 30 July 2026

Record of Change History

Issue	Description of Change	Approval	Date of Issue
1	Initial Issue	Chief Executive	14 February 2025
2	Updated with Data Use and Access Requirements	Chief Executive	July 2026

The privacy notice was last updated in July 2026 and subsequently will be updated to reflect changes either to the way in which we operate or changes to data protection legislation. We will bring any significant changes to your attention but to make sure that you keep up to date, we suggest that you revisit this notice from time to time.