

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Data Subject</b>	<b>Type of Data</b>	<b>Purpose of Processing</b>	<b>Legal Reason for Processing</b>	<b>Legal Reason for Processing Special Category Data</b>
Employees, volunteers and board members	(a) Identity Data. (b) Contact Data. (c) Financial Data. (d) Behaviour Data including criminal convictions, proceedings and criminal acts.	(a) To support and manage Highstone's employees, volunteers and board members including where necessary sharing information with payroll providers, pension providers, personal safety contractors and public authorities.	(b) Necessary to comply with legal obligations. (c) Legal obligation. (d) Performance of a contract. (e) Necessary for our legitimate interests. (f) Employment Law. (g) Prevention and detection of crime.	GDPR Article 9 2(b) and the DPA 2018, Schedule 1, Part 1 (Employment and Social Protection Law).
Contractor or their staff to manage our relationship	(a) Identity Data. (b) Contact Data. (c) Financial Data. (d) Transaction Data.	(a) To manage our relationship with you which will include paying you monies owed under a contract. (b) Meeting our obligations to you under law and your contract with us. (c) Enforcing your obligations to us under law and your contact with us.	(a) Performance of a contract with you. (b) Necessary to comply with legal obligations. (c) Necessary for our legitimate interests.	Not applicable.
Website visitor or user	(a) Identity Data. (b) Contact Data. (c) Technical Data. (d) Usage Data.	(d) To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.	(a) Performance of a contract with you. (b) Necessary for our legitimate interests.	Not applicable.
Applicant for housing	(a) Identity Data. (b) Contact Data. (c) Financial Data. (d) Behaviour Data including criminal convictions, proceedings and criminal acts. (e) Health, medical, disability and carer details.	(a) To administer and register an application for a new customer. (b) To better understand your needs and provide a better service. (c) To assess the suitability of accommodation. (d) Identify the need for any adaptations or specialised accommodation. (e) To assess whether to recommend you to engage with support services as part of our supported accommodation units.	(a) Performance of a contract. (b) Necessary for our legitimate interests.	GDPR Article 9 2(b) and the Data Protection Act (DPA) 2018, Schedule 1, Part 1 (Social Protection Law).

		<ul style="list-style-type: none"> <li>(f) To support in the right allocation accommodation.</li> <li>(g) To check affordability.</li> <li>(h) Verifying your identity.</li> <li>(i) To provide information to our staff to enable them to deliver services to you to meet your needs and to train and protect them where necessary.</li> <li>(j) To allow us to safeguard our employees and the communities where we are the landlord.</li> </ul>		
Tenant or tenant household	<ul style="list-style-type: none"> <li>(a) Identity Data.</li> <li>(b) Contact Data.</li> <li>(c) Financial Data.</li> <li>(d) Behaviour Data including criminal convictions, proceedings and criminal acts.</li> </ul>	<ul style="list-style-type: none"> <li>(a) To allocate a new tenancy that is suitable for your needs.</li> <li>(b) Adminstrating the contract to ensure your understanding of tenancy obligations (making adjustments and arrangements for you if you lack capacity).</li> <li>(c) To respond to legal claims, to deliver our services, safeguarding, or the apprehension or prosecution of offenders.</li> </ul>	<ul style="list-style-type: none"> <li>(a) Performance of a contract.</li> <li>(b) Necessary for our legitimate interests.</li> <li>(c) Necessary to comply with legal obligations.</li> </ul>	GDPR Article 9 2(b) and the Data Protection Act (DPA) 2018, Schedule 1, Part 1 (Social Protection Law).
Tenant or tenant household	<ul style="list-style-type: none"> <li>(a) Identity Data.</li> <li>(b) Contact Data.</li> <li>(c) Financial Data.</li> </ul>	<ul style="list-style-type: none"> <li>(a) Making a financial arrangement related to your home, or to collect and recover monies owed to us.</li> <li>(b) Application of relevant welfare benefits, including direct payments from Housing Benefit &amp; Universal Credit Housing Costs.</li> <li>(c) To set up arrangements relating to your home, such as informing the Local Authority departments of your tenancy arrangements for council tax and benefit purposes.</li> <li>(d) To help other people or companies to provide services or utilities to your home.</li> </ul>	<ul style="list-style-type: none"> <li>(a) Performance of a contract.</li> <li>(b) Necessary for our legitimate interests.</li> <li>(c) Necessary to comply with legal obligations.</li> <li>(d) Consent.</li> </ul>	GDPR Article 9 2(b) and the Data Protection Act (DPA) 2018, Schedule 1, Part 1 (Social Protection Law).
Tenant or tenant household	<ul style="list-style-type: none"> <li>(a) Identity Data.</li> <li>(b) Contact Data.</li> <li>(c) Financial Data.</li> <li>Behaviour Data including criminal convictions, proceedings and criminal acts.</li> </ul>	<ul style="list-style-type: none"> <li>(a) To provide handy person service and dealing with adaptation requests to individuals in their own homes</li> <li>(b) To carry out our repairs as part of our repairs standards and obligations as part of the tenancy agreement.</li> </ul>	<ul style="list-style-type: none"> <li>(a) Performance of a Contract.</li> <li>(b) Necessary for our legitimate interests.</li> <li>(c) Necessary to comply with a legal obligation.</li> </ul>	GDPR Article 9 2(b) and the Data Protection Act (DPA) 2018, Schedule 1, Part 1 (Social Protection Law).

Tenant or tenant household	<ul style="list-style-type: none"> <li>(a) Identity Data.</li> <li>(b) Contact Data.</li> <li>(c) Financial Data.</li> <li>(d) Behaviour Data including criminal convictions, proceedings and criminal acts.</li> </ul>	<ul style="list-style-type: none"> <li>(a) To enforce and/or perform terms and conditions within tenancy agreements (e.g. property damage, repairs, termination or renewal of tenancies)</li> <li>(b) Enforce your obligations to us both under your tenancy agreement and the wider law (e.g. repairs; rent arrears claims; damage to property; anti-social behaviour and termination of tenancies)</li> <li>(c) Preparing cases for legal action, including breaches of tenancy</li> <li>(d) To conduct tenancy visits and inspections.</li> <li>(e) To carry out non-statutory fire checks with partner agencies</li> </ul>	<ul style="list-style-type: none"> <li>(a) Performance of a Contract.</li> <li>(b) Necessary for our legitimate interests.</li> <li>(c) Necessary to comply with a legal obligation.</li> </ul>	GDPR Article 9 2(b) and the Data Protection Act (DPA) 2018, Schedule 1, Part 1 (Social Protection Law).
Tenant or tenant household	<ul style="list-style-type: none"> <li>(a) Identity Data.</li> <li>(b) Contact Data.</li> <li>(c) Behaviour Data including criminal convictions, proceedings and criminal acts.</li> <li>(d) Details regarding health and special needs.</li> </ul>	<ul style="list-style-type: none"> <li>(a) To act in someone's best interests such as where we have concerns about a person's health or welfare and may need to involve and refer to such agencies as Social Services or the Police.</li> <li>(b) To support you in your tenancy in partnership with support agencies and meet our legal obligations as a registered social landlord</li> <li>(c) To deal with any medical or other emergencies if they arise.</li> </ul>	<ul style="list-style-type: none"> <li>(a) Necessary to protect the vital interests of yourself or another person.</li> </ul>	GDPR Article 9 2(b) and the Data Protection Act (DPA) 2018, Schedule 1, Part 1 (Social Protection Law).
Tenant or tenant household	<ul style="list-style-type: none"> <li>(a) Identity Data.</li> <li>(b) Contact Data.</li> <li>(c) Communication Data.</li> </ul>	<ul style="list-style-type: none"> <li>(a) Photographing a tenant or their family for publicity purposes, newsletters and website content.</li> <li>(b) To deliver information materials such as troubleshoots, or newsletters making note of particular preferences.</li> <li>(c) To market / promote our services</li> </ul>	<ul style="list-style-type: none"> <li>(a) Consent (for photos to be used)</li> <li>(b) Necessary for our legitimate interests.</li> <li>(c) Necessary to comply with a legal obligation.</li> </ul>	Consent
Tenant or Household	Ethnicity data, sexual orientation and religious beliefs	<ul style="list-style-type: none"> <li>(a) To ensure fair and equal access for all to our services</li> <li>(b) To help us collate statistics to give to our regulator or other government organisation</li> </ul>	<ul style="list-style-type: none"> <li>(a) Consent for equal opportunities monitoring.</li> <li>(b) Necessary to comply with a legal obligation.</li> </ul>	Consent
Tenant or Household	<ul style="list-style-type: none"> <li>(a) Identity Data.</li> <li>(b) Contact Data.</li> </ul>	<ul style="list-style-type: none"> <li>(a) To receive customer satisfaction feedback as part of our regulatory obligations</li> </ul>	<ul style="list-style-type: none"> <li>(a) Performance of a contract</li> <li>(b) Necessary for our legitimate interests.</li> </ul>	Not applicable.

		(b) To invite to housing events (c) To respond to complaints made by you or which relate to you		
Tenant or tenant household, family member, support providers employed on site or visitors	(a) Identity Data. (b) Contact Data. (c) Financial Data. (d) Behaviour Data including criminal convictions, proceedings and criminal acts.	(a) Taking CCTV footage for security purposes. (b) For the prevention and detection of crime (c) To support to keep support providers and tenants safe.	(a) Necessary for our legitimate interests (b) Necessary to protect the vital interests of yourself or another person	GDPR Article 9 2(b) and the DPA 2018, Schedule 1, Part 1 (Employment and Social Protection Law)
Individuals making enquires	(a) Identity Data (b) Contact Data	(a) To deal with and respond to general enquires by phone, email, letter or online. (b) Recording individuals onto a waitlist for under development properties.	(a) Necessary for our legitimate interests	Not applicable

We do not sell or rent personal data which you provide to us.

If you have any questions about the contents of the above table (for example, if you would like to understand what our 'legitimate interests' are for any specific processing activity) please contact our Data Protection Representative by email at [GDPR@highstoneha.co.uk](mailto:GDPR@highstoneha.co.uk) or by telephone on 01484 609189.