



# Privacy Notice

This policy explains how **MRS Lettings CIC** and **Second Chance Housing Support Charity** uses the personal information collected from you for the operation of our lettings scheme. It also describes how long that information is kept for and the limited circumstances in which we might disclose it to third parties.

## Who we are

MRS Lettings CIC is a letting agency working as a Community Interest Company (Company Number 09808322) alongside the Second Chance Housing Support Charity (Charity Number 1166740).

Our address is;  
MRS Community Hub  
105 High Street  
Chatham  
Kent  
ME4 4DH

Our general email is: [info@mrs.plus](mailto:info@mrs.plus)  
Our office telephone number is: 01634 408840 / 403340

## Personal details we collect and hold

MRS Lettings CIC and Second Chance Housing Support Charity collects personal information from 4 different groups of people which allow us to manage the Lettings scheme:

1. **Potential Tenants** – we ask for the following personal data so that we can assess your application for a tenancy.
  - Name
  - Contact Details
  - References
  - Financial details
  - Benefit details

2. **Tenants** we ask for the following details for the purpose of running a tenancy

- Name
- contact details
- References
- records of calls, emails and postal interactions from our tenants,
- payment details
- benefit details
- emergency contact details

3. **Landlords**

- Name
- Contact details
- Payment details.
- Records of calls, emails and postal interactions from our landlords

4. **Employees and Volunteers** we ask for the following details

- Name
- Contact details
- Bank details for payment
- Emergency Contact Details
- References



## The Personal Data that we collect from you will be used for the following purposes

- For the processing of your application for a tenancy which could include
  - Checking your details
  - Checking references
  - Undertaking a financial assessment
  - Checking your eligibility for benefit where appropriate

All for determining your ability to take on a tenancy agreement

- For the running of your tenancy if you are provided with one. This will be undertaken on the lawful basis of running a contract
- If you are a landlord your information will be used to help us run the tenancy. This will be undertaken on the lawful basis of running a contract.

## Our legal basis for processing your data

### Contract



When you apply for a tenancy you enter into a pre-contract agreement and if you are issued with a tenancy agreement it is a contract.

On this basis the personal information that we obtain from you and process as part of this contract does not require your specific consent. This is because we need your personal details in order for the contract to function.

When you become one of our landlords you also enter into a contract with MRS Lettings CIC and so this is our legal basis for processing your personal data.

### Legal Obligation

Under Law we are obliged to keep some records for specific periods of time. Therefore our legal basis for keeping such information is Legal Obligation.

These include

- Tenancy records have to be kept by law for 6 years
- References for tenants have to be kept for 1 year
- Employee records need to be kept for 6 years

### Length of time information will be held

In order to comply with the General Data Protection Regulations, your details will only be kept for the shortest time required. This will vary according to the type of data being held.

- Application details are kept for a period of one month and then they are deleted if there are no suitable tenancies
- Tenancy details are kept for a period of 6 years after the end of tenancy.
- Landlord details - 6 Years
- Lamplight – REAP project clients will be kept for 6 years with consent due to project funders requirements

### Sharing personal information with third parties

Once you have become a tenant we will share relevant parts of your data with

- Your landlord
- Contractors who are required to carry out repairs
- Legal authorities who require us to do so
- Housing benefit (with your permission)
- Any public body who has worked with us to provide you with a tenancy

If you signed a REAP form your data will be shared with the following local charities should you request their help. All Saints Community Project, Homestart Medway, Medway Foodbank, MEGAN, Strood Community Project (recently ceased to exist) who are our REAP partners. Please note that we all have access to the Lamplight Database as this enhances our ability to help you if you are receiving help from more than one organisation.

### **How to access your personal data**

If you wish to see full details of the MRS Lettings CIC and Second Chance Housing Support Charity holds in connection with you, you will need to make a Subject Access Request under the General Data Protection Regulations. To initiate a Subject Access Request, email: [manager@mrs.plus](mailto:manager@mrs.plus) with Subject Access Request in the heading or call us on 01634 408840

### **Keeping your details secure**

MRS Lettings CIC and Second Chance Housing Support Charity has a contract with Thintec who provide our server where we store some of your data. These systems are ISO 27001 compliant and are in a UK Data Centre.

Your data therefore will not be sent overseas as part of the normal operation of MRS Lettings CIC and Second Chance Housing Support Charity. Some data is stored on paper work which is kept in locked filing systems in our office.

If you receive housing advice or support from MRS Lettings CIC or Second Chance Housing Support Charity your information will be kept on a systems called Lamplight which is a secure cloud based client database.

Appropriate back-up and disaster recovery solutions shall be in place.

We do not store entire credit/debit card numbers, nor do we keep records of the security code of customers' credit or debit cards. These details will be requested during the processing of specific transactions.

### **Breach**

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Charity shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO.

### **Processing of Data**

Personal data will be stored for the shortest time necessary in order to manage the MRS Lettings CIC and Second Chance Housing Support Charity, including payments, account management and

enquiries. Our retention timescales are quoted in our Privacy Policy.

Under the GDPR you have the following rights to request information from the company:

- Right of access to the data (Subject Access Request)
- Right for the rectification of errors
- Right to erasure of personal data (please note, this is not an absolute right)
- Right to restrict of processing or to object to processing
- The right to portability.

Processing is not based on receiving your consent; however, we must inform you that you have the right to withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal. If your consent is withdrawn, MRS Lettings CIC and Second Chance Housing Support Charity would still be able to use the legal basis of Contract and Legal Obligation to collect, process and store data.



**You have the right to lodge a complaint with a supervisory authority (in the UK that is the Information Commissioners Office).**

If we are to process the personal data we hold for a purpose other than that for which it was originally collected, then we will provide the you with information on what that other purpose is prior to that further processing taking place. The extra information will include any relevant further information as referred to above including the right to object to that further processing.

**The source the personal data originates from and whether it came from publicly accessible sources.**

Occasionally your personal data will have been obtained from a third party for the purpose of providing a tenancy.

Once a tenancy is agreed the details are then obtained directly from the “data subject”, that is you, “the tenant”.

**Whether the provision of personal data part of a statutory or contractual requirement or obligation and possible consequences of failing to provide the personal data .**

A tenancy is a contract and the personal data is required to fulfil that contract, without this information it would not be possible for that contract to function.

**The existence of automated decision making, including profiling and information about how decisions are made, the significance and the consequences.**

At the present time all tenancy decisions are made by a person and not by any electronic means. Even if a credit reference is received that is not favourable other factors will be taken into consideration by a person.

### **Privacy Notice Updates**

Further updates to this Privacy Notice will be published in the future in order to keep in line with GDPR and the functions of MRS Lettings CIC and Second Chance Charity.



## **MRS Lettings CIC and Second Chance Housing Charity Lawful Basis for Data Processing under GDPR**

**In order to process the data, you must have a valid and lawful basis to do so. There are six lawful bases to process data under:**

- consent
- contract
- legal obligation
- vital interests
- public task
- legitimate interests

We only collect and process your personal data when there is a lawful basis to do so. Under GDPR we use the following lawful basis:

- **Contract** : the processing is necessary to perform our Lettings Service contract.
- **Legal obligation**: the processing necessary to comply with a legal obligation, e.g. the legal requirement to keep administrative records for a certain period of time, or the legal obligation to share certain data on a police order for criminal investigation purposes.
- **Consent**: where you gave us explicit consent to process the data concerned, for example when you are signed up for REAP.
- **Legitimate interest**: for example; a legitimate commercial interest to process certain of your personal data, e.g. for running our business.

**Tenancy Support • Housing Management • Property Services • Lettings & Sales**

**MRS Lettings CIC is the trading name of MidKent Residential Services CIC • Registered in England and Wales No: 09808322  
Second Chance Housing Support Charity • Registered Charity Number 1166740  
Registered Office: MRS Community Hub, 105 High Street, Chatham, Kent ME4 4DH**