

My Genesis privacy policy

Notting Hill Genesis (“we” or “us”) are committed to protecting your privacy. This privacy policy (together the [Customer App Terms of Use](#) describes the ways in which we collect personal information from you when you use the Genesis Customer mobile application software (“the Customer App”) available via the relevant app stores (the official app stores for Android, Apple and Windows devices as applicable) once you have downloaded a copy of the Customer App onto your smart device, or personal information which you otherwise provide to us, and what we may use it for. Please read the following carefully to understand our views and practices regarding your personal data. By visiting and using the Customer App you are accepting and consenting to the practices described in this policy.

For the purposes of the Data Protection Act 1998, the data controller is Notting Hill Genesis of Bruce Kenrick House, 2 Killick Street, London, N1 9FL.

1. What data do we collect from users of the Customer App?

We may collect the following personal data (“Customer Data”) from you when you use the Customer App. The Customer Data you give us may include your name, address, email address, phone number, and other registration information and financial and credit card information.

1.1. Information you give us:

- 1.1.1. Information you provide by filling in forms on the Customer App. This includes information provided when registering to use the Customer App, updating your contact details, reporting repairs, making payments, subscribing to our digital customer magazine or any other service requiring you to subscribe or making enquiries via the ‘Contact Us’ function in the Customer App.
- 1.1.2. Information you provide when you report a problem with the Customer App;
- 1.1.3. If you contact us (by phone, letter, email, the Contact Us form in the Customer App or other means), we may keep a record of that correspondence;
- 1.1.4. We may also collect Customer Data that you provide to us when you visit our premises.

1.2. Information we collect about you

- 1.2.1. Technical information including the make and type of smart device you use, the platform your smart device uses (e.g. Android, iOS) and the version of the Customer App that you are using you’re your registration date and IMEI Number (unique number that identifies your mobile device).

1.3. Information we receive from others:

- 1.3.1. We may receive information about you if you use any of the other services we provide. We may also receive information from third parties such as sub-contractors in maintenance services, technical and payment services, analytics providers, search information providers, credit reference agencies Local Authorities and referral agencies.

2. What use do we make of Customer Data?

We will use your Customer Data for the following purposes:

- 2.1. Effectively managing our services to you (for example in respect of your tenancy, rent and service charge information and payments and building maintenance) ;
- 2.2. Dealing with your enquiries and requests;

- 2.3. Administering your Customer App account including notifying by email you about changes to services available through the Customer App;
- 2.4. Statistical monitoring to improve or tailor the services we provide through the Customer App by monitoring the number of downloads of the App which are made and the use to which it is put; and
- 2.5. Providing you with information and offers from us that we believe you may find useful or interesting, such as marketing or promotional materials, if you have opted-in to receive such information via our mailing list.

3. Disclosure

- 3.1. We may make Customer Data available to other parts of our organisation, including to any member of our group of companies and successors in title to our business (if our business is acquired by a third party). It is also necessary for us to share your Customer Data with other organisations in order to provide our services to you. These organisations include:
- 3.2. As part of the Rental Data Exchange, we may share your Customer Data with credit reference agencies and other third party suppliers. This will enable us to:
 - 3.2.1. Assess and manage any new tenancy agreements you may enter into
 - 3.2.2. Verify your identity and address to help us make decisions about services we offer to you
 - 3.2.3. Assess your financial standing in order to provide you with suitable services
 - 3.2.4. Contact you about your accounts and recovering any debts that you may owe
- 3.3. Research organisations – in confidence for bona fide research purposes
- 3.4. Utility providers – in order to assist in the transfer of the supply into your name
- 3.5. Housing associations and local authorities – we may pass Customer Data relating to a transfer application to any housing association or local authority to whom you wish to move or who advertises their property in a choice-based lettings scheme
- 3.6. Our subcontractors – our suppliers who carry out repairs and maintenance on our behalf
- 3.7. This list is not exhaustive and we may engage other third party organisations and individuals to facilitate our services, to provide the services on our behalf and to perform services related to administration of our services or the Customer App (including, without limitation, payment processing via www.allpay.net, maintenance, hosting and database management services).
- 3.8. Any relevant third party may have access to or be provided with your Customer Data only to perform these tasks on our behalf. However any third parties that operate through websites (such as allpay.net) may have their own privacy policies. We encourage you to read their privacy policies and other terms of such websites before using the services.

4. Legal and regulatory requirements

- 4.1. While it is unlikely, we may be required to disclose your Customer Data without your consent to other third party organisations in the following circumstances (which are non-exhaustive):
- 4.2. To help the police in the investigation of a crime
- 4.3. To help Social Services, the Probation Service or the Fire Service in the fulfillment of their statutory duties
- 4.4. To help local authorities to identify those persons liable to pay Council Tax
- 4.5. To assist the Department for Work and Pensions (DWP) and associated agencies in the processing of a benefits claim. Please be aware that we are also legally obliged to notify the local authority where we suspect that a customer is receiving housing benefit to which they are not entitled
- 4.6. With our solicitors in the event that we take legal action against you

- 4.7. To national or local government departments and regulatory bodies that govern the work of, or provide grant funding to housing associations including the Department of Communities and Local Government (DCLG), the Homes and Communities Agency (HCA) and the Greater London Authority (GLA)
- 4.8. To the National Fraud Initiative for the purposes of the prevention of crime
- 4.9. By a court order or to comply with other legal requirements

5. No commercial disposal to third parties:

- 5.1. We will not sell, rent, distribute or otherwise make Customer Data commercially available to any third party without your prior permission.

6. Storage of user data

- 6.1. The Customer Data we collect from you will not be transferred to, and stored at, a destination outside the European Economic Area ("EEA").. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

7. The internet

- 7.1. Given that the internet is a global environment, using the internet to collect and process Customer Data necessarily involves the transmission of data on an international basis including outside the European Economic Area. Therefore, by using the Customer App and communicating electronically with us, you acknowledge and agree to our processing of your Customer Data in this way.
- 7.2. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Customer Data, we cannot guarantee the security of your Customer Data transmitted through the Customer App; any transmission is at your own risk. Once we have received your Customer Data we will use procedures and security features to try to prevent unauthorised access. You are responsible for keeping your passcode for the Customer App secure and you should not share your passcode with anyone.
- 7.3. The Customer App may, from time to time, contain links to other Sites which are outside our control and are not covered by this Privacy Policy, including online payment provider Allpay (www.allpay.net). If you access other Sites using the links provided, the operators of these sites may collect information from you which will be used by them in accordance with their privacy policy, which may differ from ours. We do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

8. Changes to Privacy Policy

- 8.1. This Privacy Policy may be amended by us at any time. Any changes we may make to our Privacy Policy in the future will be made available via the link to our website set out in the Customer App and, where appropriate, notified to you by email or through revisions to the policy that will be notified to you on login or when you restart the Customer App.

9. Your Rights and Access to information

- 9.1. You have the right to ask us not to process your personal data for marketing and promotional purposes. We will inform you before collecting your data if we intend to use your Customer Data for such purposes.
- 9.2. You have the right to access copies of any personal data we are holding about you.

9.3. If you wish to exercise this right, please contact us at the following email address: mygenesisapp@genesisha.org.uk. We may ask you to verify your identity and for more information about your request.

10. Information about us

10.1. Notting Hill Genesis is a Registered Society as provided for by the Co-Operative & Community Benefit Societies Act 2014 and regulated by the Financial Conduct Authority (FCA). The Association is further regulated by the Homes & Communities Agency as a Registered Provider of social housing. Its Registered Office is at Bruce Kenrick House, 2 Killick Street, London, N1 9FL.

11. **Please contact us** with any questions and/or complaints about this Privacy Policy or our service to you.