

RBKC and United Living Joint Privacy Statement - Treadgold House

The Royal Borough of Kensington and Chelsea (“**RBKC**”) engages United Living (South) Limited (“**United Living**”) (together referred to as “**we**”, “**us**” or “**our**” within this privacy statement) for the purpose of carrying out repair and maintenance works at Treadgold House.

RBKC and United Living are joint controllers, responsible for your personal data collected for the purpose of scheduling and carrying out repair and maintenance works at your property. RBKC and United Living have entered into a data sharing agreement to govern the sharing of personal data between the two organisations for this purpose, to ensure that such data sharing complies with data protection law.

Each of our website privacy policies contain detailed information about our independent data processing activities, however this joint privacy statement provides you with specific information about the personal data that we collect, process and share between us as joint controllers for property repair and maintenance purposes.

Categories of personal data

We will collect personal data from you directly when you provide this to us over the phone or when you complete a consent form.

We may collect, use, store and transfer the following personal data about you:

- Identity information: name
- Property information: address, together with the nature and description of the works required at your property
- Contact data: telephone and e-mail address
- Any information about special requirements or adjustments you need us to make when attending your property. This may include special category information about your health or disabilities, or may enable us to infer information about your health or disability.

Purpose and basis of processing

We will only use your personal data for the purpose for which we collected it, which includes to schedule, carryout and make reasonable adjustments for repair and maintenance works at your property (the “**repair and maintenance purposes**”).

Under data protection law, we can only use your personal data if we have a legal basis for doing so (and if a special category processing condition applies, if the personal data is special category data).

RBKC will rely on the **public task** lawful basis to process your personal data for repair and maintenance purposes. This is because the processing is necessary in the exercise of official authority vested in RBKC.

United Living will rely on the **legitimate interests** lawful basis to process your personal data for repair and maintenance purposes. This is because the processing is necessary for United Living’s legitimate interests to deliver repair and maintenance services and your and RBKC’s legitimate interests to have repair and maintenance work carried out at your property.

Both parties will rely on **explicit consent** to process any **special category information** about you that you decide to provide at your sole discretion so that we can make necessary adjustments when attending your property, for example health or disability information. This consent will be captured verbally over the telephone or in-person via a consent form. You can withdraw your consent at any time, however please note that if you do so we may not be able to make specific adjustments when attending your property. We will advise you if this is the case at the time you withdraw your consent.

We will never use information provided by you for repair and maintenance purposes to send marketing communications to you.

Disclosures of your personal data

Your personal data will be shared between RBKC and United Living for the purposes listed above.

Both RBKC and United Living will engage external third party service providers which will process any personal data stored and processed on their systems, for example the provider of United Living's Works Management System from time to time.

We will only allow third party service providers to process your personal data if we are satisfied they take appropriate measures to protect your personal data. We impose contractual obligations on service providers to ensure they can only use your personal data to provide services to us and to you.

Under certain circumstances, we may also be required to disclose your personal data to defend a legal claim, to comply with a legal obligation or in response to valid requests by public bodies (e.g. a court or a government department).

We will not transfer your personal data collected and processed in accordance with this privacy statement outside of the United Kingdom.

Retention

We will not retain your personal data for longer than necessary for the purposes set out in this privacy statement. Different retention periods apply for different types of personal data.

When it is no longer necessary to retain your personal data, we will delete or anonymise it.

As an indication, we will keep your personal data whilst we are completing the repair and maintenance works at your property. Thereafter, we will keep your personal data for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf
- to show that we treated you fairly
- to keep records required by law

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of 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.

You can request further details of retention periods by contacting us via **Telephone:** 0800 389 2005 or **E-Mail:** Lancasterwestoffice@rbkc.gov.uk

Security

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine need to access it for their job role. Those processing your data will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breaches. We will notify you and any applicable regulator of a data security breach where we are legally required to do so.

Your rights

You have the following rights, which may be applicable to the processing covered by this joint privacy statement. You can exercise these rights free of charge by contacting either RBKC or United Living using the contact details set out below:

Access	The right to be provided with a copy of your personal data
Rectification	The right to require us to correct any mistakes in your personal data
To be forgotten	The right to require us to delete your personal data—in certain situations

Restriction of processing	The right to require us to restrict processing of your personal data—in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object: —at any time to your personal data being processed for direct marketing (including profiling); and —in certain other situations to our continued processing of your personal data, e.g. processing carried out for the purpose of our legitimate interests.
To withdraw consent	Where we are relying on consent to process your personal data you can withdraw your consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent we may not be able to make specific adjustments when attending your property. We will advise you if this is the case at the time you withdraw your consent.

For further information about your rights you can also refer to guidance provided by the Information Commissioner's Office (ICO).

Contact us

You can contact either RBKC or United Living using the contact details set out below if you have any questions about this privacy statement or the data we hold about you, to exercise a right under data protection law or to make a complaint. RBKC and United Living will assist each other to ensure that any queries, requests or complaints are properly dealt with.

RBKC DPO: dataprotection@rbkc.gov.uk

Contact email address for RBKC: Lancasterwestoffice@rbkc.gov.uk

United Living DPO:

Contact for United Living: <https://unitedliving.co.uk/contact-us/>

Making a complaint

Please contact us if you have any queries or concerns about our use of your data. We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with the ICO. The ICO may be contacted at <https://ico.org.uk/make-a-complaint> or via telephone at: 0303 123 1113