



## Awen Housing Group Privacy Notice

### 1. Identity and Contact Details of Your Organisation

Awen Housing Group (“we”, “us” or “our”) is a Registered Social Landlord in Wales, managing around 4,000 homes across Monmouthshire and south-east Wales. We also operate the Monmouthshire Common Housing Register via Homesearch ([Homesearch Privacy Notice](#)).

This notice applies to contract holders, leaseholders, residents (including children), shareholders, service users, website visitors, and anyone contacting us by email, phone, text, post, Live Chat, MyMHA App, social media, or in person. When handling personal data, we act as a data controller under the Data Protection Act 2018.

You can view our website cookie notice [here](#).

You can request a printed copy of this notice using the contact details below.

### 2. Our Contact Details

If you have any data protection questions, direct them to:

Email: [gdpr@awenhomes.co.uk](mailto:gdpr@awenhomes.co.uk)

Address: Nant Y Pia House, Mamhilad Technology Park, Pontypool, NP4 0JJ

Telephone: 0345 677 2277

ICO registration No. Z1434441

AHG appoint an external Data Protection Officer (DPO), please use the contact details below if you want to contact them directly.

Address: GDPR Sentry Ltd, Unit 434 Birch Park, Thorp Arch Estate, Wetherby, LS23 7FG

Tel: 0113 804 2035

Email: [info@gdprsentry.com](mailto:info@gdprsentry.com)

### 3. Types of personal information we process, why we process and our lawful bases

We only collect and process personal information where there is a clear lawful basis, and we will only use it for the purpose it was originally collected for (or a compatible purpose). We require this information to deliver housing services, meet our legal and regulatory obligations, and protect the health, safety and wellbeing of residents, staff and the wider community. We will tell you the relevant lawful basis at the point we collect your data. Our lawful bases for processing personal data include:

- Contract – where processing is necessary to fulfil a tenancy, lease or service agreement
- Legal obligation – where we are required to process data to comply with the law
- Consent – where you have given clear permission
- Legitimate interests – where processing is necessary for our legitimate organisational purposes
- Public task/public interest – where processing is necessary to perform a task in the public interest
- Vital interests – where processing is necessary to protect someone's life

For special category (sensitive) data, we rely on explicit consent, substantial public interest, vital interests, legal claims, and employment or social protection law where applicable.

#### Our legitimate interests

In some cases, we process personal data where it is necessary for our legitimate interests as a housing association. These interests include:

- Managing and maintaining our homes, properties and estates
- Preventing and detecting fraud, anti-social behaviour and crime
- Ensuring the safety and security of residents, staff and members of the public
- Improving our services, systems and customer experience
- Managing complaints, feedback and disputes
- Supporting effective business operations, planning and governance

Where we rely on legitimate interests, we carefully balance our interests against your rights and freedoms and only proceed where we are satisfied that the processing is fair and proportionate.

You have the right to object to processing carried out on this basis. If you wish to do so, please contact us using the details provided in this notice. We will consider your request and stop processing unless we can demonstrate compelling legitimate grounds that override your interests, rights and freedoms, or where the processing is required for legal claims.

The personal information we may process includes names, contact details, date of birth, demographic information, national insurance number, financial and employment details, housing needs, household environmental and energy information (such as humidity levels and energy usage), complaints and feedback, next of kin details, health and wellbeing information, and information relating to criminal offences.

We may obtain your information from partner organisations such as local authorities, Homesearch, other social landlords, the Department for Work and Pensions (DWP), health and social services, credit reference agencies, anti-fraud networks and the police.



We use CCTV at our headquarters and may also use surveillance systems or body-worn cameras to help prevent and investigate anti-social behaviour and support crime detection. Images are typically retained for up to 30 days, or longer where necessary for investigations.

We record inbound and outbound calls made via our main contact number. These recordings are typically retained for up to 6 months. Calls made directly to staff members may be retained for up to 30 days. Calls relating to complaints may be kept for longer where necessary. Recording will automatically pause when card payment details are being taken over the phone.

#### **4. Children's personal information**

We may hold and use personal information about children who live in a household we support (for example, to understand household needs, provide services safely, and respond to welfare or safeguarding concerns). We take extra care with children's information and only use or share it where we have a lawful basis and it is necessary.

If we are worried about a child's safety or wellbeing, we may share relevant information with appropriate agencies (such as social services, health services, the police, or the local authority) to help safeguard the child. We aim to share the minimum information needed and, where information sharing is regular, we put appropriate arrangements in place.

If you have any questions about how we handle children's data, please use the contact details above.

#### **5. Who we share your personal information with**

We will only share personal information where there is a clear lawful basis or legal obligation, and we will minimise what is shared. Data may be shared to deliver housing services (e.g. repairs and IT), protect health and safety, and meet legal and regulatory requirements.

This may include sharing with suppliers and contractors, local authorities, the Department for Work and Pensions, social and health services, the police, utility companies, insurers, legal representatives, auditors, Welsh Government and regulators, elected members, credit reference agencies, anti-fraud networks, other landlords, support providers, and third parties involved in property sales or purchases.

#### **6. How we secure your personal information**

We have policies, procedures and controls in place to keep personal information secure, aligned to the sensitivity and risk of the data. Staff are trained to handle information safely and securely. These measures are designed to prevent unauthorised access or disclosure.



## **7. How long we hold your personal information for**

We retain personal information only for as long as necessary, based on legal and operational requirements. Our data retention schedule sets out how long information is kept, and you can request a copy using the contact details above.

## **8. Transfers to third countries**

We may transfer personal information outside the UK and EEA. Where this occurs, we ensure appropriate safeguards are in place, such as adequacy decisions, International Data Transfer Agreements, codes of conduct, and supplementary measures including encryption, pseudonymisation, access controls and data minimisation.

## **9. Your rights**

Under data protection legislation you have a number of rights in relation to your personal information:

### **(a) The right to access (the personal information we hold on you)**

You have a right to ask us what personal information we hold about you, and to request a copy of your information, free of charge. This is known as a subject access request.

### **(b) The right to rectification**

You have the right to ask us to correct your personal information if you believe it is wrong.

### **(c) The right to erasure (right to be forgotten)**

You may have the right, in certain situations, to ask us to delete your data. We will need to consider the circumstances of any such request and balance this against our need to continue processing the data. If we are unable to agree to delete your data requested we will let you know why.

### **(d) The right to restrict us processing your personal information**

In some cases, you may be able to ask us to restrict our processing of your data. When processing is restricted, we are allowed to store the information, but not do anything with it.

### **(e) The right to object to processing**

You have the right to object to processing where we say it is in our legitimate business interests. We must stop using the information unless we can show there is a compelling legitimate reason for the processing, which override your interests and rights or the processing is necessary for us or someone else to bring or defend legal claims.

**(f) The Right to withdraw consent**

Whenever you have given us your consent to use your personal information, you have the right to change your mind at any time and withdraw that consent.

If the basis on which we are using your personal information is your consent, then we must stop using the information.

**(g) The right to be informed**

You have the right to be informed about the collection and use of your personal data including purposes for processing your personal data, retention periods and who it will be shared with at the time your personal data is collected from you.

**(h) The right to portability**

The right to data portability allows you to obtain and reuse your personal information for your own purposes across different services. It allows you to move, copy or transfer personal information easily from one IT environment to another in a safe and secure way. The right only applies to personal information you have provided to us where the reason we are relying on to use the information is either your consent or for the performance of a contract.

**(i) The right to object to automated decision making**

You have the right to object to decisions made about you solely by automated means.

If you wish to exercise your rights, we will respond within one calendar month or explain why we cannot.

For further information on your rights, you can visit the ICO's webpage [A guide to individual rights | ICO](#).

**10. Right to Complain to the ICO**

If you believe your personal information has not been handled correctly, or you are dissatisfied with our response, please contact us using the details above, or here: ([Contact Us - Awen Housing Group](#)) or at our above Head Office address.

If you remain dissatisfied, you can contact the Information Commissioner's Office (ICO).

Tel: 0303 123 1113

writing: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Online: [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns)



### **11. Artificial Intelligence (AI). Automated Decision-Making and Profiling**

To improve service delivery, we may use AI tools for administrative tasks and data analysis. AI is not used for automated decision-making.

#### **Changes to this Privacy Notice**

This notice is kept under review. It was last updated in May 2026.