

Privacy Notice

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TWO RIVERS HOUSING: Privacy Notice Summary

1 Who are we

- 1.1 Two Rivers Housing is the Data Controller whose head office is located at Rivers Meet, Cleeve Mill Lane, Newent, Gloucestershire, GL18 1DS.
- 1.2 We own over 4700 properties in Gloucestershire, Herefordshire and Worcestershire and employ around 200 staff, mostly based at our head office.
- 1.3 We are a Charitable Community Benefit Society, and our TwoCan for profit Estate Agency, www.twocan.estate. We may also operate as a Data Processor for our commercial customers.

2 What this notice is about

- 2.1 This Privacy Notice is a public document and applies to all customers of Two Rivers Housing and subsidiaries to explain how the organisation collects and processes personal information to conduct normal business activities as a Charitable Community Benefit Society. We are a Registered Social Landlord (RSL) regulated by the Regulator of Social Housing (RSH). Services include:
 - a) Providing social and other types of housing.
 - b) Property and grounds maintenance and repair.
 - c) Managing your housing, tenancy/lease and account as your landlord.
- 2.2 We also provide additional services including:
 - a) Promoting, organising and assisting community events.
 - b) Offering opportunities to be involved (co-regulation).
 - c) Providing welfare, benefits and debt advice (WBDA).
 - d) Adaptations made to the properties we manage.
 - e) Marketing, buying, selling and letting of properties and/or land.

3 How we collect can collect your information

- 3.1 Two Rivers Housing collects information about you in a number of ways. This includes when you apply for a property or service, complete a form, contact us by phone, post or email, meet with us in person, or take part in a survey. We may also collect information when you use our website, social media pages, or your **My Account** online service.

- 3.2 Our landline phone calls are recorded for training and monitoring purposes and our recordings are usually held for a period of six months. Notes may be made using AI translate in our CRM system about conversations that take place.
- 3.3 We operate CCTV at our Rivers Meet office premises to help prevent and detect crime. The system operates continuously, and recordings are kept for up to one month.
- 3.4 From time to time, we may use CCTV, sound recording and/or photography in certain shared areas, such as communal bin stores, shared entrances or areas, and development sites. This is to collect evidence of suspected breaches of tenancy, anti-social behaviour, or criminal activity. We follow the ICO's CCTV Code of Practice and display clear signage where CCTV is in use. We do not use covert CCTV.
- 3.5 We take photographs at our properties, events and within our communities for record-keeping, marketing and publicity purposes. Photographs of identifiable individuals will only be used for marketing or publicity where the individual has given their consent.
- 3.6 We may receive information about you from third parties including:
- a) Your local council or benefits office in connection with your housing.
 - b) Previous landlords and credit reference agencies when you apply for housing.
 - c) Police, welfare, or support organisations involved in supporting you.
 - d) Councillors, Members of Parliament, or other representatives acting on your behalf or with your permission.
 - e) Financial institutions when you apply for our services.
 - f) Individuals or organisations that make an enquiry or submit a complain

4 What information do we collect about you

- 4.1 The basic information required from all customers is your name and contact details, such as email, telephone or address.
- 4.2 The personal information we may need from tenants or leaseholders includes:
- a) Your full name and proof of identity (such as photo identification).
 - b) Your date of birth.
 - c) Your National Insurance number, where required as a unique identifier.
 - d) Your contact details, including telephone number, email address, or correspondence address.
 - e) Details of anyone authorised to act on your behalf, where applicable.
 - f) Basic details (name and date of birth) of other people living in your

household.

- g) Bank account details where rent is paid by Direct Debit.
- h) Card payment details where payments are made by card (note that card details are not stored).
- i) Evidence of housing eligibility and details of any interest or equity you hold in other property.
- j) Other personal information, where necessary, which may vary depending on the circumstances, for example to investigate or resolve tenancy breaches, alleged anti-social behaviour, or suspected fraud.

4.3 The information may also collect the following types of personal information about you where it is necessary:

- a) Information about disabilities, support needs, or vulnerabilities. We use this information to tailor our services to better support your individual circumstances.
- b) Financial information. This may be used to carry out pre-tenancy affordability and sustainability checks, help manage rent arrears, and, where you choose to access them, provide free welfare, benefits, or debt advice to support budgeting, bill payments, or funding applications made on your behalf.
- c) Health information or other details about your circumstances where required to support applications for grants or funding for property improvements or adaptations. Further details are provided if you use these services.
- d) Next of kin or emergency contact details you choose to provide, which may be used in an emergency. You should only provide this information where the individual has agreed to act as your emergency contact and understands that Two Rivers Housing may contact them about you.
- e) Other special category information used for statistical reporting and analysis, including to meet regulatory and equality monitoring requirements.
- f) Identification and financial evidence, such as photo ID, bank statements, payslips or income details, where required to process a house or land sale, purchase, or letting.
- g) Data from shared utility systems or smart home technology, where installed, which is used to monitor and manage your home.

4.4 If you do not provide the information we need, we may be unable to provide all of our services to you. In some cases, this may mean that you cannot hold a tenancy or lease with us, or sell, purchase, or let a property through us.

5 What processing we do with information collected

- 5.1 The information we collect from you is used to manage your tenancy or leasehold agreement, or any other contract between you and Two Rivers Housing. Please read your contract carefully, as the legal basis for processing your personal information and carrying out our activities is usually the **performance of a contract**.
- 5.2 Our main processing activities include:
- a) Managing your rent and service charges, payments, arrears, debts and recharges.
 - b) Managing repairs, maintenance and property adaptations.
 - c) Ensuring compliance with tenancy or contract conditions, including managing rent arrears, debt, anti-social behaviour (ASB) and fraud.
 - d) Marketing, buying, selling and letting properties and/or land.
 - e) Complying with relevant legal and regulatory requirements.
- 5.3 We may also process warning and vulnerability information as part of the legitimate functions we carry out to safeguard our workforce, including contractors.
- 5.4 Two Rivers Housing undertakes research and statistical analysis to improve our business processes, the services we provide to customers, and to assess our performance against benchmarks. Where possible, this information is anonymised or pseudonymised.
- 5.5 We regularly and periodically carry out customer surveys to understand satisfaction and identify areas for service improvement.
- 5.6 We use a range of information and communications systems and technologies to operate efficiently. Personal data is stored and managed within these systems, which are maintained to ensure high standards of Confidentiality, Integrity and Availability (CIA), in line with best practice cyber security standards.
- 5.7 Information held in our IT systems may be copied for testing, backup, archiving and disaster recovery purposes. All data held on Two Rivers Housing–owned systems is stored within the UK.
- 5.8 We also use a number of third-party and hosted systems, such as Microsoft 365. These services may store data on servers located in Europe, the European Economic Area (EEA), or outside the EEA. We only work with organisations that confirm compliance with UK data protection legislation, EU GDPR, or equivalent privacy standards.

6 Additional voluntary services

- 6.1 Two Rivers Housing conducts a number of additional voluntary services including organising community events, providing debt advice, adapting the property you live in and gathering information to improve our services.
- 6.2 For these voluntary services, where your personal information is needed and your consent is required, we will always explain the service and obtain your consent to proceed, usually by way of a sign up/consent form for that service.
- 6.3 For these additional services, much of the information set out in our Privacy Notice remains applicable. This includes details about Two Rivers Housing as the Data Controller, how to contact the Data Protection Officer, and your rights under data protection legislation, such as the right to withdraw consent and the right to raise a complaint.

7 Children's information

- 7.1 Two Rivers Housing does not usually process children's personal information as part of a tenancy, as all tenants are adults. However, we do record limited information about children living in our properties, such as their name and date of birth. This information is needed to ensure properties are not overcrowded and to support tenancy management activities where it is necessary to understand household composition and ages.
- 7.2 We may also receive and process children's information when it relates to housing or tenancy matters, for example as part of an anti-social behaviour (ASB) case, a welfare concern, or where we are working with other agencies as part of a multi-agency approach.

8 Property information

- 8.1 Most of the information we use relates to our properties and their repair and maintenance. Property-related information linked only to the property address is not considered personal data. Examples include the age of a kitchen, the results of an asbestos survey, planned window replacements, or details of a tap repair.
- 8.2 We are generally happy to answer any questions you may have about the property you live in and the work that has been carried out to it.
- 8.3 When property information is combined with your name, contact details, or other personal data—such as when arranging or completing a repair visit—it is treated as personal information.

9 How we will communicate with you

- 9.1 Two Rivers Housing needs to communicate with our customers, usually in writing or by telephone. Increasingly, however, communication is taking place electronically as we move towards paperless services. Many of our services are now provided online, as this is generally more convenient for you and more efficient for us. Our secure online tenant service is called “**My Account.**”
- 9.2 If you use the **My Account** service, it is important that you keep your login details secure and do not share them with anyone else. The security and privacy of your personal information, as with any online service, relies on you keeping your username and password confidential and choosing a strong password that cannot easily be guessed. Where there is a joint tenancy, each tenant has their own individual **My Account**.
- 9.3 Our tenants receive our newsletter, **Tenant Topics**, which provides updates about what is happening within the organisation and in our communities. We are required by our regulator to keep tenants informed and to offer opportunities for involvement. You may opt out of receiving this newsletter at any time by updating your **My Account** communication preferences or by contacting customerservices@2rh.org.uk
- 9.4 Tenants may also receive promotional information about community events that are relevant to them or taking place in their local area. You can opt out of these communications by updating your **My Account** preferences or by contacting customerservices@2rh.org.uk
- 9.5 We will only discuss or share details about your tenancy or lease with individuals named on the agreement, or with those you have authorised. You can provide temporary authorisation verbally over the phone, or permanent authorisation by contacting incomecollection@2rh.org.uk and completing our written authorisation form.

10 Communicating with other customers

- 10.1 Where Two Rivers Housing needs to communicate with individuals who are not tenants or residents, this will usually be because you are a supplier, partner, buyer or seller, freeholder or leaseholder, stakeholder, or a member of the public.
- 10.2 We typically work with suppliers, partners, buyers and sellers, and freeholders or leaseholders under a formal agreement or contract, or during the process of entering into a contractual relationship.

10.3 We may also communicate with stakeholders or members of the public where we have a legitimate interest to do so as part of our normal business activities. This may include responding to enquiries, requesting information, or keeping you informed about matters that involve or relate to you or your role.

11 Who we share data with and how long we keep information

11.1 Two Rivers Housing shares limited personal information with contractors who delivery services on our half and developers and their sub contractors on homes in the end of defects liability period. All contractors are required to comply with relevant legislation and our data processing agreements to ensure that personal data is handled securely and used only for specified purposes. This may include operating our out-of-hours telephone service and carrying out emergency, responsive or planned repairs and property improvements.

11.2 We may also share your information with a language translation service where it is necessary to translate information to or from a foreign language for you.

11.3 In some circumstances, Two Rivers Housing may need to share personal information with government departments and agencies, our regulator and auditors, utility providers, or other organisations where we are legally permitted or required to do so.

11.4 Information relating to a tenancy or lease agreement is retained for as long as the agreement remains active, while any contractual matter or obligation is unresolved, or while money remains owed on the account. This information is then retained for a period of up to seven years in accordance with our Data Retention Policy.

11.5 Where a property or land sale is involved, we may need to share relevant information with property or landowners or freeholders, solicitors, agents, mortgage brokers, financial advisers, court agents, surveyors and valuers

11.6 Further information is available in the Policies section of our website library, including:

- a) [Privacy notice for tenants and buyers](#)
- b) [Submit social housing lettings and sales data \(CORE\) - GOV.UK](#)

12 What we will not do

12.1 We will not send unsolicited direct marketing communications to individuals without their consent. However, we may carry out business-to-business marketing activities.

12.2 We do not sell personal information to third parties.

12.3 We will not share your personal information with unrelated third parties unless we are legally permitted or required to do so, or unless you have given us your explicit consent.

13 Your rights to information, Your rights to complain

13.1 You have the right to request a copy of the personal information we hold about you by making a Subject Access Request (SAR). We do not usually charge a fee for this service and will respond within one month of receiving your request. To help us locate the relevant information more efficiently, it is helpful if your request is as specific as possible, including details about the information you wish to access, what it relates to, and the relevant time period. Broad or general requests will require further clarification and will delay our response. We may also need to request information from you to confirm your identity. If you wish to submit a SAR please use the following link [Subject Access Request](#) or if you have questions about your personal information, please contact customerservices@2rh.org.uk and we will always aim to help as part of our friendly and supportive service.

13.2 You also have the right to request that we correct inaccurate information, ask for your personal information to be erased, request a restriction on how your information is processed, or withdraw your consent where processing is based on consent. If you wish to exercise any of these rights, please contact customerservices@2rh.org.uk

13.3 Further information about your data protection rights is available on the Information Commissioner's Office (ICO) website at:
<https://ico.org.uk>

13.4 You have the right to complain about any matter relating your home or our service and how we use your personal information:

- a) In the first instance please contact our Customer Services Team on 03333 55 44 33, e-mail complaints@2rh.org.uk or visit our website to raise a complaint.
- b) If you are still not happy with our service, you may complain to the Housing Ombudsman Service <http://www.housing-ombudsman.org.uk>
- c) If you wish to complain about our use of your personal information, you can contact our Customer Services on 03333 55 44 33, e-mail complaints@2rh.org.uk or visit our website to raise a complaint.

- d) If you remain unhappy with our response you have the right to complaint to the Information Commissioner's Office (ICO) at <https://ico.org.uk> Our ICO registration number is Z9137407.

14 Lawful processing

14.1 We process your personal information in accordance with data protection laws (UK General Data Protection Regulation (UK GDPR 2021) and Data Protection Act 2018).

14.2 Data protection law requires us to rely on one or more lawful grounds to process your personal information. We may process your personal data under the following:

- a) Performance of a Contract
- b) Consent
- c) Performance of a task in the public interest
- d) Legal Obligation
- e) Vital Interests
- f) legitimate Interests.

14.3 Recognised Legitimate Interests

14.4 We may also process your personal information where it is necessary for a recognised legitimate interest. This lawful basis allows us to use information for certain purposes the law has identified as being in the public interest. These include:

- a) Safeguarding vulnerable individuals
- b) Crime prevention and detection
- c) Responding to emergencies
- d) Public health
- e) Safeguarding national security or public safety

14.5 Special Category Data

14.6 Sometimes Two Rivers Housing processes special category information about you. Special category data is a type of personal information that is more sensitive and needs stronger protection and an additional lawful basis. Special Category data includes things like your health information, race or ethnic origin, religious beliefs, sexual orientation and biometric data used to identify you.

14.7 We may process this type of personal information in the following circumstances:

- a) With your explicit consent
- b) Where we are carrying out our legal obligations
- c) It is necessary for reasons of substantial public interest

14.8 Less commonly we may process it to protect your vital interests or in the defence of legal claims.

15 Further information

15.1 Two Rivers Housing produces several different leaflets designed to inform you about our services and other useful topics. There is a leaflet on 'Compliments, Comments and Complaints' available from the Policies section of our website library.

15.2 For further information about Two Rivers Housing, please see our website at www.tworivershousing.org.uk where you will find out website terms & conditions and information about website cookies, or contact our Customer Services Team.

16 Changes to our Privacy Notice

16.1 Our Privacy Notice may be updated from time to time. The latest full version is always available from our website at www.tworivershousing.org.uk

17 Other websites

17.1 Our websites contains links to third party websites. We are not responsible for the content or privacy practices of third party websites.

18 Future enhancements

18.1 We regularly improve our **My account** on-line service and include a Privacy Dashboard where you can set or remove consent for various optional services and opt out of receiving communications.