

Our Privacy Notice

This privacy notice tells you what to expect when STAR Housing processes information, especially personal information.

Your privacy is important to us, and we are therefore committed to handling your personal data in accordance with the provisions of the General Data Protection Regulations (GDPR) and the Data (Use and Access) Act 2025.

Lawful Bases for General Personal Data (Article 6 UK GDPR)

- **Tenancy management:** We process your personal data to manage your tenancy agreement under the lawful basis of contract (Article 6(1)(b)).
- **Rent collection and arrears recovery:** We process financial information to collect rent and recover arrears under our legal obligations (Article 6(1)(c)) and legitimate interests (Article 6(1)(f)).
- **Customer engagement and satisfaction surveys:** We use your contact details to send satisfaction surveys based on our legitimate interests in improving services (Article 6(1)(f)).
- **Marketing communications (e.g. newsletters):** We send newsletters and service updates based on your consent (Article 6(1)(a)).
- **Employment applications:** We process job applicant data to assess suitability for employment under the lawful basis of legitimate interests (Article 6(1)(f)) and contract (Article 6(1)(b)).

Lawful Bases for Special Category Data (Article 9 UK GDPR)

- **Health-related support services:** We may process health information to provide tailored support services under Article 9(2)(h) — for the provision of social care.
- **Criminal offence data (e.g. anti-social behaviour):** Where necessary, we process data about criminal convictions under Article 10 and Schedule 1 of the Data Protection Act 2018, for safeguarding and tenancy enforcement.
- **Equality monitoring:** We collect data on race, religion, and sexual orientation for equality monitoring under Article 9(2)(g) — substantial public interest.

STAR Housing is committed to full compliance with the Data (Use and Access) Act 2025. We are actively reviewing and updating our data governance practices to align with DUAA's principles of transparency, accountability and ethical data use. This includes strengthening our data sharing protocols, enhancing audit traceability and embedding DUAA-aligned safeguards into our operational frameworks. Our privacy notice will continue to evolve to reflect these commitments.

How we collect personal information

We collect information in a variety of ways including using this website (see Information we collect via this website and Cookies); on various forms, tenancy agreements, and contracts; through our ongoing contact with you; in some cases we collect CCTV images; and calls to and from the following telephone numbers are recorded 0333 3212 200, 01743 210202, 01743 210212 and 01743 210214.

When you apply to become a STAR Housing customer, we request and hold on file any references necessary to assess your application including as appropriate (but not limited to) references from other housing providers/private landlords, your mortgage lender (if you own/have owned your own home), the Police, the Probation Service, support workers, social workers, mental health workers and credit reference agencies.

If you provide us with personal information relating to members of your family or your associates we will assume that you do so with their knowledge and their consent to the collection and processing of the information.

It is important that you notify us of any changes to your personal information.

Who the personal information relates to:

We collect personal information about:

Customers; This includes current, former and potential customers, who live in our properties or access our support and other services, and could also include their family and people associated with them.

Colleagues; This includes current, former and potential colleagues, as well as Board and Committee members, apprentices and volunteers.

Anyone who makes a complaint or enquiry and visitors to our website and offices.

How we use our records

We will collect, process, share and securely store personal information in compliance with data protection laws.

All information will be retained in accordance with the requirements of our retention schedule.

We keep these records to allow us to:

- Make allocations
- Manage tenancies
- Receive rent and service charges
- Ensure bills and benefits are accurate and paid accordingly
- Provide a repairs and maintenance service
- Provide home ownership products
- Offer help with debts and benefits
- Provide Support services which help customers achieve their goals
- Prevent & detect crime and resolve disputes

- Promote safety and the quiet enjoyment of our neighbourhoods & communities
- Engage with customers and make improvements to our products and services
- Promote equal opportunities and fair treatment for all colleagues and customers
- Provide employment and training advice and opportunities
- Manage employment and colleague development
- Work with partners to deliver mutual success
- Provide information (e.g. about products and services) you request from us
- E-newsletter

Details of our Records and Document Retention Policy can be provided upon request.

We use a third-party provider to deliver our monthly newsletter. We gather statistics around email opening and clicks using industry standard technologies including clear gifs to help us monitor and improve our e-newsletter.

Sensitive personal information

Under GDPR certain personal information is classified as “sensitive”. Sensitive data is information relating to physical or mental health, sex life, religious or philosophical beliefs, political opinions, membership of a Trade Union, allegations of criminal offences and criminal convictions and offences.

We minimise our holding and use of sensitive categories of personal information but, given the services we provide, there are times when we use it, for example when providing accommodation for disabled persons or those with problems around substance abuse, when resolving neighbourhood disputes involving alleged criminal activity or when helping someone to access care services.

When we collect specific sensitive data we will notify you of how we will use it, including who it may be shared with.

Job applicants and our current and former colleagues

Personal information about unsuccessful candidates will be held for 6 months after the recruitment exercise has been completed, it will then be destroyed or deleted. We retain de-

personalised statistical information about applicants to help inform our recruitment activities, but no individuals are identifiable from that data.

Once a person has taken up employment with STAR Housing, we will compile a file relating to their employment. The information contained in this will be kept secure and will only be used for purposes directly relevant to that person's employment. Once their employment with STAR Housing has ended, we will retain the file in accordance with the requirements of our retention schedule and then delete it.

Complaints or enquiries

We try to meet the highest standards in all areas of our business. We take any complaints we receive about this very seriously. We welcome any suggestions for improving our procedures. If you do make a complaint or enquiry we may collect and store personal information in relation to this matter, we will keep it secure and use it only for the purpose it was collected. When the matter is resolved or completed, we will retain the details in accordance with our retention schedule and then destroy them.

Cookies

Cookies are small text files that are placed on your computer by websites that you use. They are widely used to make websites work more efficiently. For further information about how we use cookies please see our Cookies Policy.

CCTV

Some of our properties have CCTV in public areas to deter crime and anti-social behaviour and to promote public safety by helping to identify and prosecute criminal offenders. You can ask for a copy of any CCTV images taken of yourself by making a subject access request.

Sharing your personal information

Normally, only STAR Housing staff will be able to see and process your personal information. However, there may be times when we will share relevant information with third parties for the purposes as outlined above, or where we are legally required to do so. When sharing personal information, we will comply with all aspects of GDPR.

Sensitive information about health, sexual life, race, religion and criminal activity for example is subject to particularly stringent security and confidentiality measures.

Where necessary or required, we may share your personal information as follows:

- With our contractors, in order to undertake repairs, maintenance or improvement works

- With third party service providers, in connection with services performed on our behalf. For example, if we use a research company to carry out a resident satisfaction survey or if we use a mailing house to distribute our newsletters
- Our relationships with such providers are governed by our contracts with them which include strict data sharing and confidentiality protocols
- With other housing associations, trusts and landlords, in connection with tenancy references and associated enquiries
- With community partners in connection with the delivery of coordinated local services.
- With utility companies (and their representatives) and Council Tax Offices, to ensure billing details are correct or in connection with unpaid bills
- With credit reference agencies and debt collection agencies, in connection with some housing applications and in relation to any outstanding charges
- With local authorities and government departments, as necessary for administering justice, or for exercising statutory, governmental, or other public functions
- With police and other relevant authorities (e.g. Probation Service, Department of Work & Pensions, HM Revenues & Customs) in relation to the prevention or detection of crime and fraud; the apprehension or prosecution of offenders and the assessment or collection of tax or duty
- With other statutory organisations, e.g. social services & health authorities, as necessary for exercising statutory functions
- With our regulator, the Homes & Communities Agency (HCA), to comply with our regulatory obligations

This list is not exhaustive as there are other circumstances where we may also be required to share information, for example:

- To meet our legal obligations
- In connection with legal proceedings (or where we are instructed to do so by Court order)

To protect the vital interests of an individual (in a life-or-death situation)

Access to your personal information

Under GDPR you have a right to ask us what personal information we hold about you and to request a copy of your information. This is known as a 'subject access request' (SAR). SARs need to be made in writing, and we ask that your written request is accompanied by proof of your identity.

If someone is requesting information on your behalf, they will need written confirmation from you to evidence you consent for us to release this and proof of ID.

Please be as specific as you can be about the information you are requesting, for example about a particular matter or from a particular period of time. It helps if you clarify the details of what you would like to receive in your written request.

In response to SARs, we will provide you with a copy of the information we hold that relates to you. This will not generally include information about your property such as repair logs, details of contractor visits or general property maintenance information as this is not classed as personal information. We will respond to SARs within one month of receiving the request, and responses will be in electronic format unless requested otherwise at the time of receiving the SAR.

Please be aware that we may need to edit some information out if it relates to other people, as we must protect the privacy rights of all individuals.

If you have any queries about accessing your information, please contact your Housing Officer.

Security of information

For further information on how we maintain the security of your information, please see our Data Protection Policy. Our contact for data protection queries can be contacted by emailing enquiries@starhousing.org.uk.

Changes to our privacy notice

We keep our privacy notice under regular review, and we will place any updates on our website. To make sure that you keep up to date, we suggest that you revisit this notice from time to time.

This privacy notice was last updated December 2025.

Link to other websites

The notice is limited to this website only. If you follow a link to an external site, we recommend that you check the privacy notice of that site before giving any personal details.