



CDS Co-operatives Privacy Notice

CDS Co-operatives (CDS) respects the privacy of its residents and customers. We are a landlord with rented, shared ownership and leasehold and sold freehold stock with estate service charges. CDS is the data controller for any data that we collect and process in respect of our own tenants and leaseholders.

We also provide housing management and associated services to a number of independent housing co-operatives and other resident groups. When we are performing our duties under any contractual arrangement to provide services for a client landlord we act as a data processor. Depending on the services that we provide, we will collect and process data about the residents and leaseholders of our client landlords in the same ways set out in this privacy notice but also in accordance with our contractual agreement with the client landlord.

Your contact with us generates records including records of some personal information that is subject to the Data Protection Act 2018, the UK General Data Protection Regulation 2021 (UK GDPR) and the Data (Use and Access) Act 2025. Where personal data is processed outside the UK, we rely on approved transfer mechanisms such as the UK-US Data Bridge or an International Data Transfer Agreement (IDTA).

This privacy notice explains our approach to data protection.

How we collect personal information

We collect information in a variety of ways including via our website, on various forms and contracts, through our ongoing contact and correspondence with you, with other support agencies that relate to you (such housing benefit offices, welfare or support organisations) and from people associated with you such as family, friends and neighbours. We may also operate CCTV systems at some of our estates for the detection of crime, which operates continuously. We may also record telephone calls for training, monitoring and the investigation of complaints.

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 consent. Information you give us relating to those that live with you will be retained and processed as this information is necessary for us to carry out our duties as landlord as set out in the tenancy agreement.

It is important that you notify us of any changes to your personal information as soon as possible so that we can contact you easily.

What information we hold

When you apply to become a CDS resident, we obtain information to determine your housing needs. In order to help us assess your application, we may take up 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.

Once you become a CDS resident, we will also need benefit and council tax information, feedback from our contractors about their appointments with you and other aspects of our routine contact with you. We will record information whenever you contact us or use our services and we will note any action taken, for example logging repairs, so that we have a record of what happened. We may also keep photographic records of you in order to help us identify tenancy fraud. We may hold your bank account details if you make payments to us by direct debit or we have to make payments to you. We may collect information from you about disabilities or vulnerabilities, which we use to tailor our service to better meet your particular circumstances or needs. We may use this information for safeguarding of staff.

We might take photographs at events that we organise and host. We may use the images on our website, in brochures and other publicity material (such as newsletters) and provide them to the media for publication in local or national newspapers. We will always give you the option not to be included in a photograph. Where group shots are to be taken there will be a sign warning that photographs are being taken and any individual photographs will only be taken with your consent in writing.

Who the personal information relates to

We collect and hold personal information about:

- **Customers** – This includes current, former and potential customers who live in our properties and includes members of their family and people associated with them.
- **Clients** – Details of client landlords for whom we provide services and where relevant to the services provides details of their customer – i.e. the current, former and potential customers who live in their properties and the members of their family and people associated with them.
- **Visitors** – Visitors to our website and our offices. Anyone who makes a complaint or enquiry to CDS Co-operatives.

How we use our records

We keep records to allow us to:

- Make allocations of accommodation
- Manage tenancies including collecting rent and service charges
- Provide a repairs and maintenance service
- Monitoring and ensuring that our homes meet our health and safety obligations
- Ensuring that people are safe when working for us or on our behalf
- Provide home ownership products
- Offer help with debts and benefits
- Keep in touch with our customers, understand your needs and preferences and invite you to events
- Prevent and detect crime and resolve disputes



- Prevent and detect fraud and money laundering
- Promote safety and the quiet enjoyment of our neighbourhoods and communities
- Engage with customers and make improvements to our products and services
- Promote equal opportunities and fair treatment for all our customers
- Provide information (e.g. about products and services) you request from us
- Develop new products and services to meet the future needs of our communities
- Meet our legal obligations, including those owed to our funders or regulators

Special Category Personal Data

Under the Data Protection Act 2018 and UK GDPR, certain personal information is classified as “Special Category Personal Data”. Special category personal data is information relating to physical or mental health, sex life, religious or philosophical beliefs, political opinions, membership of a Trade Union, biometric information, 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 to understand our customers and their needs better, for example when providing accommodation for disabled persons, when resolving neighbourhood disputes involving alleged criminal activity or when helping someone to access other services. When we collect specific special category personal data we will notify you of how we will use it, including who it may be shared with, and seek your consent to this.

Children’s Information

We do not normally process children’s information as part of a tenancy, as all tenants are adults. However, we record children’s basic information if they are resident in our properties including their name and date of birth. This is required for checking that the property is not overcrowded and to assess other tenancy management issues where all householders and ages are required to be known.

We may receive children’s information if we are involved in the housing and tenancy aspects of a welfare case as part of a multi-agency working solution.

Consent

If you have a tenancy agreement or lease with CDS, the data we collect and process is used to fulfil our contractual obligations. As such we are not relying on your consent as our legal basis of processing your data. If there are any circumstances where we might need to process your data in respect to additional voluntary services we will always notify you of this fact before we process your data and obtain your consent to proceed.

Retention of Data

If you have a tenancy agreement or lease with CDS, we will retain the data we hold on you for the duration of the agreement and for a six-year period after the agreement comes to an end.



Call Recording

We may record telephone calls made to our offices for the purposes of training, monitoring and the investigation of complaints. As we record calls, when a resident calls to make a debit card payment over the telephone our staff will take a contact number and call the resident back straight away suppressing call recording so that no card details are recorded.

We also collect GPS location data from our lone-worker safety system to protect staff welfare.

Direct marketing

We never provide your personal information to other companies for their marketing purposes. We will never send you unsolicited marketing material.

What we will not do

We will not sell your personal data to third parties.

We will not pass on your personal data to unrelated third parties unless we are required to do so by law or we have your explicit permission to do that.

Where we transfer data outside the UK, we rely on the UK-US Data Bridge or an International Data Transfer Agreement (IDTA).

We will send you marketing only where we have your explicit consent or a 'soft opt-in' under the Privacy and Electronic Communications Regulation (PECR) 2003. You may opt out at any time.

Cookies

A "cookie" is a piece of software that attached to the hard drive of your computer or mobile device and remembers information about the configuration of your computer. We may use this information to track your movements through our website to find out how it is being used and to assess its usefulness.

Personal information about you is not collected during the tracking process. You can disable the cookies that we attach if your browser supports this. However, you should bear in mind that if you exercise this option, you may be unable to access certain parts of our site.

Third Party Websites

Because we want your experience of our website to be as informative and useful as possible, we may provide links to websites operated by third parties. Please be aware that we do not control such third party websites and that such websites may send their own cookies to users, or otherwise collect data or solicit personal information gathering practices of Third Party Websites that you are able to access through our site, and we encourage you to review each Third Party Website's privacy policy before disclosing any personally identifiable information.



Sharing your information

We will keep your personal information secure and confidential. Our staff have restricted access to personal information on a “need to know” basis. We may share information with contractors, or agencies we work with, such as Local Authorities, Social Services, Police, other social landlords when we believe it is in your, or the public’s interest to do so. We will also disclose information as required by law.

In particular, please be aware:

- We may share current or forwarding addresses with utility companies and Council Tax offices to ensure billing details are correct.
- If you default on any tenancy/licence conditions, we may provide information about you to authorised debt recovery agencies, to enable them to recover the debt. This may affect future applications for tenancies, credit and insurance.
- We will pass information about you to contractors who are working on our behalf so that they are able to contact you. We may provide these contractors with information about you or your home that we feel they need to know to ensure that they are safe in your home or to ensure they give you the best possible service.
- We may discuss your financial situation, rent payments (including any arrears) and any claims made for welfare benefits with an external debt advice agency, Welfare rights advisor, the housing benefit department or the local authorities housing advice and homeless prevention team to make sure that benefits are paid correctly.
- We may pass data about your rent payment record to credit reference agencies. This will enable them to assist other organisations to assess your financial standing if you apply for products and services.
- We may pass your contact information to a third party to conduct surveys and research on our behalf, which allow us to gather feedback and improve the services we offer you. The third party will be bound to strict terms and conditions outlined by us and will not share your data with other organisations. Should you choose not to participate in the surveys the third party will securely destroy your data.
- We may share your National Insurance number to verify your Universal Credit application and manage these payments.
- We may also share your National Insurance number in order to prevent and investigate tenancy and right to buy applications fraud.

Profiling

The UK General Data Protection Regulation defines profiling as any form of automated processing intended to evaluate certain aspects of an individual, in particular to analyse or predict characteristics.

Your rights

You have the right to ask us in writing not to process your personal information if it is causing or likely to cause substantial damage or distress, or for direct marketing. There may also be other specific circumstances where you may wish for us to stop processing your data, such as if you agreed to take



part in a survey or signed up to an optional service. However, we need to maintain certain records to enable us to provide you with the services you enjoy.

You have the right to request that we correct any information that we hold that is inaccurate.

You have the right to access any personal information we hold about you. If you would like copies of some specific information from your files, we will try to provide it as quickly as possible. Please contact our office, your Housing Officer or the Corporate Services Director.

If you require a substantial amount of your personal information, there is a formal process for this, under the data Protection Act 2018 and UK GDPR, known as a Subject Access Request (SAR).

You also have the right to claim compensation if we fail to comply with the Data Protection Act 2018 and UK GDPR and you suffer damage as a result.

What you need to know about making a SAR:

- The right of subject access under the Data Protection Act 2018 and UK GDPR is an individual one. This means that we cannot process joint requests – they have to be treated separately.
- You can write to us to make your request and, if necessary, we will provide you with a SAR form for completion. Please write to the Corporate Services Director, CDS Co-operatives, Unit A, Arc House, 82 Tanner Street, London SE1 3GN.
- We will require proof of your identity and address – we will let you know this when we receive your request.
- When we receive your request and have confirmed your identity to our satisfaction, we shall respond within one month. We aim to and provide your information within one month, but complex requests may take up to three months.

Changes to our privacy notice

We will update this privacy notice to reflect changes either to the way in which we operate or changes to data protection legislation. We will bring any significant changes to your attention but to make sure that you keep up to date, we suggest that you revisit this notice from time to time at <https://www.cds.coop/privacy/>

Contacting us

We welcome any queries you may have regarding this privacy notice, or any information we hold about you. Please contact:

Corporate Services Director
CDS Co-operatives
Unit A, Arc House
82 Tanner Street



London SE1 3GN

TalkToUs@cds.coop

Other Resources

The Information Commissioners Office (ICO) is the UK's independent body who upholds information rights in the public interest. Arches Housing are registered as a Data Controller with the ICO. Their contact details are below:

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

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number
Fax: 01625 524 510

Website: <https://ico.org.uk/>

This privacy notice was reviewed and updated in September 2025.