



Privacy Notice

**Providing quality services that
make a real difference to people's
lives**

Issued:

Author:

Privacy Notice

Calico Homes Limited

This privacy notice explains how Calico Homes Limited collects, uses, shares and protects personal information. It also explains your rights and how to complain if you are unhappy with the way we handle your personal information.

We aim to be clear, open and honest about how we use personal information. We only use personal information where we have a lawful basis to do so and where it is necessary for the services we provide, our legal duties, the protection of individuals, or the effective management of our organisation.

1. Who we are

Calico Homes Limited is the data controller for the personal information covered by this notice. This means we decide why and how personal information is used.

Registered address: Calico Homes Limited, Centenary Court, Croft Street, Burnley BB11 2ED.

Data Protection Officer: You can contact our Data Protection Officer by writing to the address above or by emailing dataprotection@calico.org.uk.

Customer Services: You can contact our Customer Services team on 0800 169 2407 or 01282 686 300, or by emailing contact@calico.org.uk.

2. Who this notice applies to

This notice applies to tenants, leaseholders, housing applicants, household members, former tenants, service users, complainants, visitors, people who contact us, people who use our website or tenant portal, representatives acting on behalf of individuals, and other people whose information we process as part of our housing and related services.

3. Personal information we collect

Depending on your relationship with us and the services you use, we may collect and use the following types of personal information:

- identity and contact details, such as your name, date of birth, address, telephone number, email address, National Insurance number and proof of identity;
- household information, including details of household members and authorised representatives;
- tenancy, lease, application, repair, maintenance and property records;
- financial information, including rent accounts, arrears, benefits, payment details and affordability information;
- communications with us, including calls, emails, letters, complaints, enquiries, survey responses and records of contact;
- information needed to investigate tenancy breaches, anti-social behaviour, fraud, safeguarding concerns, complaints or legal claims;
- images, CCTV, call recordings, photographs and other evidence where necessary for security, service delivery, record keeping, consent-based publicity, or investigation purposes;
- website, portal and system information, including login details, online interactions and security information.

4. Special category and criminal offence data

Some personal information needs extra protection. This may include information about health, disability, vulnerability, racial or ethnic origin, religion or belief, or other equality information. We only use this information where it is necessary and where we have both a lawful basis under Article 6 UK GDPR and a separate condition under Article 9 UK GDPR.

We may also process information about criminal allegations, offences, convictions, anti-social behaviour, fraud, safeguarding, security incidents or tenancy enforcement where this is necessary and lawful. Where required, we will identify an Article 10 UK GDPR basis and an appropriate condition under Schedule 1 of the Data Protection Act 2018, and maintain an appropriate policy document.

5. How we collect personal information

We collect personal information directly from you when you apply for housing or services, complete forms, contact us, use our website or tenant portal, respond to surveys, attend meetings, make a complaint, or otherwise interact with us.

We may also receive information from third parties, including local authorities, benefits officers, previous landlords, credit reference agencies, support organisations, police, health or social care bodies, MPs, councillors, representatives acting on your behalf, contractors, regulators, courts and other organisations where this is necessary and lawful.

6. Why we use personal information and our lawful bases

Data protection law requires us to have a lawful basis for each purpose for which we use personal information. The table below explains the main reasons we use personal information and the lawful bases we rely on.

Purpose	Personal information used	Lawful basis
Managing housing applications, tenancies, leases and accounts	Identity, contact, household, tenancy, lease, account and financial information	Contract, Article 6(1)(b); legal obligation, Article 6(1)(c); legitimate interests, Article 6(1)(f)
Providing repairs, maintenance, adaptations and property services	Contact details, property records, access needs, repair history, vulnerability or health information where relevant	Contract, Article 6(1)(b); legal obligation, Article 6(1)(c); legitimate interests, Article 6(1)(f); where special category data is used, Article 9 UK GDPR conditions may also apply
Managing rent, arrears, payments, benefits advice and debt support	Financial information, rent account records, benefit information, income details and communications	Contract, Article 6(1)(b); legal obligation, Article 6(1)(c); legitimate interests, Article 6(1)(f); consent for optional services, Article 6(1)(a)
Investigating complaints, tenancy breaches, anti-social behaviour, fraud, safeguarding, security incidents or legal claims	Contact details, tenancy records, communications, evidence, CCTV, photographs, witness information, warning markers, safeguarding information and criminal	Legal obligation, Article 6(1)(c); legitimate interests, Article 6(1)(f); vital interests, Article 6(1)(d); legal claims and substantial public interest conditions under Article 9 UK GDPR where special category data is used; Article 10 UK

	offence data where relevant	GDPR and Schedule 1 Data Protection Act 2018 conditions where criminal offence data is used
Keeping people safe and protecting staff, contractors, customers and communities	Vulnerability information, risk information, emergency contact details, safeguarding information, warning markers, CCTV and incident records	Legal obligation, Article 6(1)(c); legitimate interests, Article 6(1)(f); vital interests, Article 6(1)(d); where special category data is used, Article 9 UK GDPR conditions may also apply
Improving services, carrying out surveys, reporting and meeting regulatory requirements	Contact details, service records, feedback, complaints, equality information and anonymised or aggregated data where possible	Legal obligation, Article 6(1)(c); legitimate interests, Article 6(1)(f); consent where required, Article 6(1)(a); substantial public interest under Article 9 UK GDPR where equality monitoring or special category data applies
Communicating with you and managing customer involvement	Contact details, communication preferences, customer records, involvement records and feedback	Contract, Article 6(1)(b); legal obligation, Article 6(1)(c); legitimate interests, Article 6(1)(f); consent where required, Article 6(1)(a)
Marketing, publicity and community engagement	Contact details, preferences, photographs, stories, case studies or event information	Consent where required, Article 6(1)(a); legitimate interests for appropriate service-related communications, Article 6(1)(f); legal obligation where communications are required by regulation, Article 6(1)(c)
Managing our website, tenant portal, IT systems, security, backups and business continuity	Login details, online activity, system records, audit logs, technical information and security information	Contract, Article 6(1)(b); legal obligation, Article 6(1)(c); legitimate interests, Article 6(1)(f)

Where we use special category data, we will also identify an Article 9 UK GDPR condition. Where we use criminal offence data, we will identify an Article 10 UK GDPR basis and a relevant condition under the Data Protection Act 2018, unless processing is carried out under official authority.

7. Consent and withdrawing consent

We do not rely on consent for most of our core housing services because we usually need to use personal information to provide services, manage contracts, comply with the law, protect people, or pursue legitimate interests.

Where we do rely on consent, we will explain what we are asking for, why we need it, and how you can withdraw it. You can withdraw consent at any time. This will not affect any processing carried out before consent was withdrawn.

8. Who we share personal information with

We only share personal information where it is necessary, lawful and proportionate. Depending on the circumstances, we may share relevant information with:

- contractors, repairs providers, maintenance providers, out-of-hours services and other suppliers acting on our behalf;
- local authorities, benefits teams, social services, safeguarding bodies, health or care organisations and support agencies;
- police, probation services, courts, tribunals, fraud prevention bodies, debt recovery agencies, legal advisers and insurers;
- credit reference agencies, previous landlords, other registered providers, managing agents, surveyors, valuers, mortgage brokers and financial advisers where relevant;
- utility companies, Council Tax offices and other organisations involved in property or tenancy administration;
- regulators, auditors, ombudsman services, government departments and public bodies where required;
- translation services, community partners, representatives acting on your behalf, MPs or councillors where appropriate.

Where we use processors to provide services on our behalf, we require them to protect personal information, only use it for agreed purposes, and comply with data protection law. We do not sell personal information to third parties.

9. Confidential patient information and national data opt-out

Where any of our services process confidential patient information, we will identify whether the Control of Patient Information Regulations 2002 and the national data opt-out apply. At the date of this notice, we do not share confidential patient information for research or planning purposes where the national data opt-out would apply. We will review this position regularly.

10. How long we keep personal information

We keep personal information only for as long as we need it for the purpose it was collected, including to provide services, meet legal and regulatory requirements, manage risk, resolve disputes, respond to complaints, support audits, or defend legal claims.

Tenancy and lease records are usually kept while the tenancy or lease is active and for a defined period afterwards in line with our retention schedule. Some limited core records, such as who held a tenancy, at which property and when, may be kept for longer where this is necessary for property history, legal, regulatory or safeguarding reasons. We regularly review retention periods and securely delete or anonymise information when it is no longer needed.

11. International transfers

We do not routinely transfer personal information outside the UK. Where we use suppliers or systems that involve international transfers, we will make sure the transfer complies with UK GDPR requirements and that appropriate safeguards are in place.

12. Children's information

We may process children's information where they live in one of our properties, are part of a household application, are involved in safeguarding or welfare matters, or where their information is relevant to the housing or support services we provide. This may include name, date of birth, household details, support needs, safeguarding information or information needed to assess property suitability.

We will only use children's information where necessary and will take extra care to protect it. Where privacy information is aimed directly at children, we will aim to make it clear and age appropriate.

13. Your data protection rights

Under data protection law, you have rights over your personal information. These rights are not absolute and may depend on the circumstances and the lawful basis we rely on. Your rights include:

- the right to be informed about how we use your personal information;
- the right of access to obtain a copy of your personal information;
- the right to rectification if information is inaccurate or incomplete;
- the right to erasure in certain circumstances;
- the right to restrict processing in certain circumstances;
- the right to object to processing in certain circumstances, including direct marketing;
- the right to data portability where this applies;
- rights relating to automated decision-making and profiling, where this applies.

To exercise your rights, contact dataprotection@calico.org.uk or write to the Data Protection Officer at the address in this notice. We may need to confirm your identity before responding.

14. Data protection complaints

You have the right to complain if you are unhappy with how we use your personal information or how we respond to a data protection request. You can complain by contacting Customer Services or the Data Protection Officer using the contact details in this notice.

Under the Data (Use and Access) Act 2025, we must have a process for handling data protection complaints. We will acknowledge receipt of a data protection complaint within 30 days, take appropriate steps to respond without undue delay, make appropriate enquiries, keep you informed where appropriate, and tell you the outcome without undue delay.

If you remain unhappy with our response, you can complain to the Information Commissioner's Office, the UK supervisory authority for data protection. You can contact the ICO at www.ico.org.uk. Our ICO registration number is Z4571092. Complaints about housing services may also be referred to the Housing Ombudsman Service where appropriate.

15. How we communicate with you

We may contact you by post, telephone, email, text message, tenant portal, online account, or another appropriate method. We will use your communication preferences where we can, but we may need to contact you using a particular method where this is necessary for service delivery, safety, legal, regulatory or contractual reasons.

16. Marketing, newsletters and customer involvement

We will not send unsolicited direct marketing where consent is required. We may send service-related communications, newsletters, regulatory information, customer involvement opportunities and community information where this is relevant to our services, our regulatory duties, or our legitimate interests. You can update your preferences or opt out of optional communications by contacting us.

We will only use photographs, case studies, stories or testimonials for publicity or marketing where we have an appropriate lawful basis and, where required, your consent.

17. Website, tenant portal and cookies

If you use our website, tenant portal or online services, we may collect information about your account, login activity, online interactions and technical information needed to operate, secure and improve those services. Information about cookies and similar technologies should be provided in our cookie information or website terms.

18. Additional voluntary services

Some services are optional, such as community events, customer involvement activities, debt advice, support services, adaptations, surveys, property-related services or promotional activity. Where a service is optional, we will explain what information is needed, why it is needed, the lawful basis we rely on, and whether you can withdraw consent or opt out.

19. Changes to this notice

This privacy notice was last updated in July 2026. We will review and update it when necessary to reflect changes in our services, data protection law, including the Data (Use and Access) Act 2025, ICO guidance, or how we use personal information. The latest version should be available on our website.