

# Privacy Notice

Midland Heart Ltd makes records from our contact with you, including personal information that is subject to the UK General Data Protection Regulations (UK GDPR) and the Data Protection Act 2018 (DPA 18). We also collect information about you from third parties.

We will always protect the privacy of any personal information we hold about you.

This Privacy Notice describes the purpose of information updates, marketing or market research purposes.

If you wish to know more about our approach to Data Protection, please read this Privacy Notice:

## Introduction

We take your privacy seriously and you can find out more here about your privacy rights and how we collect, use, share and secure your personal data. This includes the personal data we already hold and the further personal data we might collect in the future, either from you or from a third party.

We obtain your personal data in order to conduct our normal business operations as a registered social housing provider. How we use your personal identifiable information depends on the products and services we provide to you.

Midland Heart's Data Protection Officer (DPO) provides help and guidance to make sure we correctly apply the law to the processing and protection of your personal data. If you have any questions about how we use your personal data, our DPO can be reached by email at [dataprotection@midlandheart.org.uk](mailto:dataprotection@midlandheart.org.uk) or by post to The Data Protection team, Midland Heart, 20 Bath Row, Birmingham, B15 1LZ.

We may change this Notice from time to time in accordance with the changes at Midland Heart Ltd or to reflect changes to regulation or legislation. Please check this page regularly to ensure that you're happy with any changes.

## Who we are

- Midland Heart Limited is a society registered under the Cooperative and Community Benefit Societies Act 2014, number 30069R. Our registered office is at 20 Bath Row, Birmingham, B15 1LZ, United Kingdom.

- Midland Heart Limited is registered as a 'Data Controller' on the Public Register of Data Controllers maintained by the Information Commissioner's Office under number Z9424056.

### **Your rights to the personal data that we hold about you**

Personal Data is data that relates to an individual or data that can identify an individual. It is data specifically about a person. For a full definition, you can see the UK [GDPR](#) Article 4.

### **The information we collect and why**

We collect or use the following personal information for information updates, marketing or market research purposes:

- Names and contact details
- Addresses
- Marketing preferences
- Personal information used for the purpose of research
- Records of consent, where appropriate

We also collect the following special category information for information updates, marketing or market research purposes. This information is subject to additional protection due to its sensitive nature:

- Racial or ethnic origin
- Religious or philosophical beliefs
- Health information
- Sexual orientation information

### **How we use your personal information**

We may use personal and sensitive personal information for customer profiling and segmentation work to help us improve services and deliver them in a more targeted way. This is to ensure fair and equal access for all to our services and to meet the requirements of the Regulator of Social Housing:

Segmentation is using information to divide customers into groups that are similar in specific ways, such as age, gender and ethnicity.

Profiling is using information to describe set of customers that includes demographic, geographic and other characteristics.

We may use personal and sensitive personal information for large scale analysis. For example, we may calculate the average rent arrears for tenants across different ages.

We may also send you information to ask about your experiences of using our services, or ideas for how we could improve. You are able to opt-out of receiving contact of this nature and we will record this on our database.

### **The lawful basis which allows us to process your personal data**

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR or you can find out more on the ICO’s website [A guide to lawful basis | ICO](#)

Which lawful basis we rely on may affect your data protection rights which are set out below under “Your rights”

Our lawful bases for collecting or using personal information for information updates, marketing or market research purposes are:

- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

### **Your rights**

Where we do hold personal data about you, you have rights to access that data. you have the right to be informed who is obtaining and using your personal data, how this data will be retained, shared and secured and what lawful grounds will be used to obtain and use your personal data.

You have the right to object to how we use your personal data in certain circumstances.

You also have the right to obtain a copy of the personal data we hold about you.

In addition, you can ask us to correct inaccuracies, delete or restrict the use of some of your personal data or to ask for some of your personal data to be provided to someone else.

You can make a complaint if you feel that we are using your personal data unlawfully and/or holding inaccurate, inadequate or irrelevant personal data which may have a detrimental impact on you or your rights.

These rights are not absolute. That means sometimes we don't have to grant these rights, but usually we should give you a reason.

If you would like to see what personal data we collect, use, share and secure about you, it would help us to identify what you would like to see.

For example:

- let us know what the matter was regarding
- provide a date range, or
- tell us know who was involved

We will try to answer any enquiries you make, but the more detail and help you can give us, the more quickly we can help you.

If you do want to see copies of your personal data, or to ask us to correct, delete or stop processing your personal data, please contact us at [dataprotection@midlandheart.org.uk](mailto:dataprotection@midlandheart.org.uk).

If you are dissatisfied with our response, please let us know so that we can address any concerns.

To make enquires for further information about exercising any of your rights in this Privacy Notice, please contact Midland Heart's Data Protection Officer, whose contact details are above.

### **Making a complaint**

We always ask that you contact us first if you have any complaints about the way we are processing your personal data. We will do everything we can, that the law allows, to respect your request.

If you have contacted us and you are still unhappy about the way we are processing your data, you can submit a complaint the UK Information Commissioner's Office:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint> to the Information Commissioner's Office at [ico.org.uk](https://www.ico.org.uk).

### **Where we get your information from**

We get personal information directly from you.

### **How long do we keep your personal data for**

For the duration of individual processing activities only.

For more information on how long we store your personal information or the criteria we use to determine this please contact us using the details provided above.

### **Security**

We are committed to ensuring that your information is secure. All of our staff have contractual obligations of confidentiality, enforceable through disciplinary procedures. All staff receive appropriate training about data protection, cyber security and confidentiality of information.

Policies and procedures are in place so that Midland Heart staff and organisations acting on behalf of Midland Heart have a framework for consistent, compliant, and safe operation.

We take relevant organisational and technical measures to ensure that the information we hold is secure, such as holding information in secure locations and restricting the access of information to authorised personnel. We protect personal and confidential information held

on equipment such as laptops and hand-held devices with encryption. However, the transmission of information via the internet is not completely secure and so we cannot guarantee the security of data sent to us electronically.

This policy was last updated in March 2026.