

West Bromwich Homes Limited Privacy Notice

Your personal information and what we do
with it March 2026



Your personal information and what we do with it

Although you may not have direct contact with West Bromwich Homes Limited, we hold your personal information as a result of your tenancy with us and/or your relationship with Leaders Roman Group. Leaders Roman Group is engaged by West Bromwich Homes Limited to provide certain services in relation to the lettings and administrative functions of West Bromwich Homes Limited. West Bromwich Homes Limited is a wholly owned subsidiary of West Bromwich Building Society. This privacy notice therefore applies to your personal information.

The meaning of some terms that we use in this privacy notice:

Automated decision making means a process where we make decisions about you, such as your suitability for a tenancy or other suitable services, using a computer based and automated system without a person being involved in making that decision (at least first time around).

Profiling means any form of automated processing of your personal information to evaluate certain personal aspects about you, such as to analyse or predict aspects concerning your economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

Process or processing includes everything we do with your personal information from its collection, right through to its destruction or deletion when we no longer need it. This includes for instance collecting it (from you), obtaining it (from other organisations), using, sharing, storing, retaining, deleting, destroying and transferring it overseas.

Legitimate interests is mentioned in our privacy notice because data protection laws allow the processing of personal information where the purpose is legitimate and is not outweighed by your interests, fundamental rights and freedoms. Those laws call this the legitimate interests legal ground for personal data processing.

Who we are and how to contact us and our Data Protection Officer

West Bromwich Homes Limited of 2 Providence Place, West Bromwich B70 8AF, is a data controller of your personal information. This means information that is about you or from which you can be identified. This privacy notice describes how we deal with your personal information. We are the data controller of this information under relevant data protection laws because in the context of our business relationship with you we decide how and why it is processed in the ways explained in this privacy notice. When we use terms such as we, us and our in this notice, we mean West Bromwich Homes Limited. Where we use terms such as you and yours, we mean the tenant or prospective or former tenant to whom this notice is given.

Where this notice is given to more than one person it is given to each of you separately.

Our Data Protection Officer can be contacted at any time including if you have queries about this privacy notice or wish to exercise any of the rights mentioned in it.

You will see at the end of this privacy notice that we mention the privacy notice of Credit Reference Agencies (CRAs). We do need to share this with you. Please read it carefully and contact those organisations if you have questions (their details are in their notices).

This privacy notice may be updated from time to time. You should check the webpage [www.westbrom.co.uk/ subs-privacy-notice](http://www.westbrom.co.uk/subs-privacy-notice) regularly so that you can read the up-to-date version.

Why we are giving you this notice

We are required by law to give you this notice. We must be open with you about why information is collected about you and then what is done with it. We must act fairly in relation to this information. You have various legal rights relating to this information which are set out in more detail in this notice.

In order that we can collect or use information about you there must be a legal basis for doing so. This notice identifies the relevant legal basis for the various types of information we collect and hold about you.

Under data protection legislation we can only process data "as necessary" and only to the extent that it is needed. For example, we can use your bank details in connection with payments and other limited purposes only. However, in certain instances, as necessary, we can share any of your data, e.g. with our own professional advisers or letting and managing agents. We may also share any of your data, as necessary, with the police/law enforcement agencies or regulatory authorities.

What is the source of your personal information?

We will generally collect your personal information indirectly from Leaders Roman Group when they introduce you to us.

Leaders Roman Group includes the following registered data controllers; LRG (ICO No. ZA781332),

LRG is registered at Building 1, Meadows Business Park, Blackwater, Camberley, GU17 9AB.

Their privacy notice is available to view at <https://www.lrg.co.uk/privacy/>. The notice may be updated from time to time and you should check the webpage regularly so that you can read the up to date version.

In addition, we obtain your personal information from other sources such as Fraud Prevention Agencies, Credit Reference Agencies (CRAs), your employer, former landlord, other lenders, HM Revenue and Customs (HMRC), Department for Work and Pensions (DWP), publicly available directories and information (e.g. telephone directory, social media, internet, news articles), debt recovery and/or tracing agents, other organisations to assist in prevention and detection of crime, police and law enforcement agencies. In addition, some of your personal information may come from other members of the West Bromwich Building Society Group if you already have a relationship with them.

Some of the personal information obtained from CRAs will have originated from publicly accessible sources. In particular, CRAs draw on court decisions, bankruptcy registers and the electoral register (also known as the electoral roll). We explain more about CRAs on page 7. We have also mentioned on page 3 in the lists of personal information that we process some of the CRAs' other sources of information (which are our own source of information too).

What kinds of personal information about you do we process?

We use different ways to collect data about you including the information you supply to us or the Leaders Roman Group when applying for a tenancy.

As necessary the following personal data is processed by us and/or the Leaders Roman Group:

- Your title, full name, your contact details, including for instance your email address, home and mobile telephone numbers;
- Your home address, correspondence address (where different from your home address) and address history;
- Your date of birth and/or age, e.g. to make sure that you are eligible to apply for the tenancy and/or services that are suitable for you;
- Your nationality, if this is necessary for us to comply with our legal and regulatory requirements;
- Records of how you have contacted us and, if you get in touch with us online, details such as your mobile phone location data, IP address and MAC address;
- Personal information which we obtain from Fraud Prevention Agencies (see the section on 'Fraud Prevention Agencies' on page 8); and
- Some special categories of personal data such as about your health or your personal circumstances (more details on page 6).
- Your financial details e.g. your salary and details of other income, details of your savings, details of your expenditure, and details of account(s) held with other providers if you pay your rent from those account(s);
- Details about all of your existing borrowings and loans;
- Personal information about your credit history which we obtain from Credit Reference Agencies (CRAs) including data which originates from Royal Mail (UK postal addresses), local authorities (electoral roll), the insolvency service, Companies House, other lenders and providers of credit (who supply data to the CRAs), court judgments, decrees and administration orders made publicly available through statutory public registers (see the section on 'Credit Reference Agencies' on page 7);
- Information about your employment status including whether you are employed, retired or receive benefits;
- Information about your occupier status, such as whether you are a tenant, live with parents or are an owner occupier of the property in which you live at the time of your application;
- Information which is relevant for your residency and/or citizenship status, such as your nationality, your length of residency in the UK and/or whether you have the permanent right to reside in the UK;
- Your marital status, family, lifestyle or social circumstances if relevant to the tenancy (e.g. the number of dependents you have or if you are a widow or widower); and
- Where relevant, information about any guarantor which you provide in any application.

Joint applicants and guarantors

If you make a joint application with your spouse, partner or family member, we will also collect the personal information mentioned earlier about that person. You must show this privacy notice to the other applicant and ensure they confirm that they know you will share it with us for the purposes described in it. If you look now at the 'What are the legal grounds' section (on page 4) you will see reference to consent and a description of some limited scenarios where it may be relevant to what we do with personal information. If we ask you to

obtain consent from the joint applicant (such as for marketing) you should do that using the consent capture mechanism that we give or make available to you for that purpose.

If you apply for a tenancy with a guarantor, that person will receive a privacy notice when they submit their own personal information to us because they must provide their details within the tenancy agreement.

What are the legal grounds for our processing of your personal information (including when we share it with others)?

Data protection laws require us to explain what legal grounds justify our processing of your personal information (this includes sharing it with other organisations). For some processing more than one legal ground may be relevant (except where we rely on a consent). Here are the legal grounds that are relevant to us:

- 1) Processing necessary to perform our contract with you for the tenancy or for taking steps prior to entering into it (during the application stage):
 - a) Administering and managing your tenancy and services relating to that, updating your records, tracing your whereabouts to contact you about your tenancy and doing this for recovering debt;
 - b) All stages and activities relevant to managing your tenancy including enquiry or application, administration and management or setting up/ changing/removing guarantors; and
 - c) When we do what we will call throughout this privacy notice 'profiling and other automated decision making'; by 'automated decision making' we mean making decisions about you, such as your suitability for a tenancy or other suitable services, using a computer based and automated system without a person being involved in making that decision (at least first time around) and by 'profiling' we mean doing some automated processing of your personal information to evaluate personal aspects about you, such as analysing or predicting your economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.
- 2) Where we consider that, on balance, it is appropriate for us to do so, processing necessary for the following legitimate interests which apply to us and in some cases other organisations are:
 - a) Administering and managing your tenancy and services relating to that, updating your records, tracing your whereabouts to contact you about your tenancy and doing this for recovering debt;
 - b) To test the performance of our services and internal processes;
 - c) To adhere to all applicable legislation from time to time in force together with guidance and best practice under the regimes of governmental and regulatory bodies such as HMRC, the Financial Conduct Authority, the Prudential Regulation Authority, the Financial Ombudsman Service, the Information Commissioner's Office and the Financial Services Compensation Scheme;
 - d) For management and audit of our business operations including accounting;
 - e) To carry out searches at Credit Reference Agencies as and when required. These may be carried out by Leaders Roman Group on our behalf;
 - f) To carry out monitoring and to keep records;
 - g) To administer our good governance requirements and those of other members of

the West Bromwich Building Society Group;

h) For market research and analysis and developing statistics;

i) For some of our profiling and other automated decision making, in particular where this does not have a legal effect or otherwise significantly affect you; and

j) When we share your personal information with these other people or organisations:

- Your guarantor (if you have one);
- Joint account holders, trustees and beneficiaries, and any person with power of attorney over your affairs (in each case only if relevant to you);
- Members of the West Bromwich Building Society Group and/or Leaders Roman Group;
- Our legal and other professional advisers, auditors and actuaries;
- Financial institutions and trade associations;
- Governmental and regulatory bodies such as HMRC, the Financial Conduct Authority, the Prudential Regulation Authority, the Financial Ombudsman Service, the Information Commissioner's Office and the Financial Services Compensation Scheme;
- Tax authorities who are overseas for instance if you are subject to tax in another jurisdiction we may share your personal information directly with relevant tax authorities overseas (instead of via HMRC);
- Trades people to arrange repairs and maintenance of your property;
- Other organisations and businesses who provide services to us such as debt recovery agencies, back up and server hosting providers, IT software and maintenance providers, document storage providers and suppliers of other back office functions;
- Buyers and their professional representatives as part of any restructuring or sale of our business or assets;
- Actual or proposed transferees, acquirers or assigns of all or part of our rights and obligations;
- Any party with whom we or our agents have, or are considering entering into, a contractual agreement in relation to your tenancy;
- Credit Reference Agencies and their professional advisers; and
- Market research organisations who help us to develop and improve our services.

3) Processing necessary to comply with our legal obligations:

a) For compliance with laws that apply to us;

b) For establishment, defence and enforcement of our legal rights or those of any other member of the West Bromwich Building Society Group and/or Leaders Roman Group;

c) For activities relating to the prevention, detection and investigation of crime;

d) To carry out identity checks, anti-money laundering checks, and checks with Fraud Prevention Agencies as and when required;

e) To carry out monitoring and to keep records;

- f) To deal with requests from you to exercise your rights under data protection laws;
 - g) To process information about a crime or offence and proceedings related to that (in practice this will be relevant if we know or suspect fraud); and
 - h) When we share your personal information with these other people or organisations:
 - Your guarantor (if you have one);
 - Joint account holders, trustees and beneficiaries, and the person with power of attorney over your affairs;
 - Fraud Prevention Agencies;
 - Law enforcement agencies and governmental and regulatory bodies such as HMRC, the Financial Conduct Authority, the Prudential Regulation Authority, the Financial Ombudsman Service, the Information Commissioner's Office and the Financial Services Compensation Scheme (depending on the circumstances of the sharing); and
 - Courts and other organisations where it is necessary for the administration of justice, to protect vital interests and to protect the security or integrity of our business operations.
- 4) Processing with your consent:
- a) When you request that we share your personal information with someone else;
 - b) For direct marketing communications;
 - c) For some of our profiling and other automated decision making; and
 - d) For some of our processing of special categories of personal data such as about your health or your personal circumstances (and it will be explained to you when we ask for that explicit consent what purposes, sharing and use it is for).
- 5) Processing for a substantial public interest under laws that apply to us where this helps us to meet our broader social obligations such as:
- a) Processing of your special categories of personal data such as about your health or your personal circumstances;
 - b) Processing that we need to do to fulfil our legal obligations and regulatory requirements; and
 - c) When we share your personal information or details of your personal circumstances with other people and organisations such as members of the West Bromwich Building Society Group and/or Leaders Roman Group, your relatives, social services, your carer or the person who has power of attorney over your affairs.

How and when can you withdraw your consent?

Much of what we do with your personal information is not based on your consent, instead it is based on other legal grounds. For processing that is based on your consent, you have the right to take back that consent for future processing at any time. You can do this by contacting us using the details on page 2. The consequence might be that we cannot send you some direct marketing communications, or that we cannot take into account special categories of personal data such as about your health or your personal circumstances (but these outcomes will be relevant only in cases where we rely on explicit consent for this).

We will inform Leaders Roman Group that you have withdrawn your consent. You should make sure to contact them directly to withdraw your consent for what they do with your personal information as they are a data controller in their own right.

Is your personal information transferred outside the UK?

We may transfer your personal information to one of our suppliers outside the UK, but only where adequate protection measures are in place in compliance with data protection laws. For example, transfers of your personal information to the EU/EEA are permitted under the EU's UK GDPR adequacy decision. For transfers to countries without an adequacy decision, we will safeguard your personal information by putting in place data transfer agreements based on the applicable Standard Contractual Clauses and/or make use of other appropriate data transfer mechanisms. We will further protect your personal information by always using encryption methods whereby such information is converted into a code only readable by the organisation to which it is sent.

Cookies, online forms, third party websites and social media websites

Cookies

We use cookies on our website. For detailed information on the cookies we use and the purpose for which we use them, please see our Cookies Policy here: www.westbrom.co.uk/privacy-and-security-centre/cookies.

Online forms

When we collect personal data, for example via an online form, we will explain what we intend to do with it.

Third party websites

When we include links to third party websites, please bear in mind they'll have their own privacy and cookie policies. We recommend you read their policies as we're not responsible or liable for these sites.

Social media websites

We are a user of LinkedIn and interact with other users by creating a public profile which includes information on our current activities. If you post on our LinkedIn pages or send us a private or direct message via LinkedIn, we will assume you give permission for us to respond. When we include links to social media sites, please bear in mind they'll have their own privacy and cookie policies. We recommend you read their policies as we're not responsible or liable for their sites.

Artificial Intelligence (AI)

We and our third parties may use AI in our processing of personal data, this may be used to streamline processes and enhance your customer experience. Any use of AI will not be used for wider public AI learning and will remain within the control of us or our third parties. We will not use AI to make fully automated decisions. See the Profiling and other automated decision-making section below for other uses of AI.

How do we share your information with Credit Reference Agencies?

In order to process your application, we will perform credit and identity checks on you with one

or more Credit

Reference Agencies ('CRAs'). We may also make periodic searches at CRAs to manage your tenancy with us.

- To do this, we will supply your personal information to CRAs and they will give us information about you. CRAs will supply to us both public (including the electoral register) and shared credit, financial situation and financial history information and fraud prevention information. We will use this information to:
- Assess your creditworthiness and whether you can afford to take the tenancy;
- Verify the accuracy of the data you have provided to us;
- Prevent criminal activity, fraud and money laundering;
- Manage your tenancy;
- Trace and recover debts; and
- Ensure any offers provided to you are appropriate to your circumstances.

When CRAs receive a search from us they will place a search footprint on your credit file that may be seen by other lenders.

If you are making a joint tenancy application, or tell us that you have a spouse or financial associate, we will link your records together, so you should make sure you discuss this with them, and share with them this information, before lodging the application. CRAs will also link your records together and these links will remain on your and their files until such time as you or your partner successfully files for a disassociation with the CRAs to break that link.

The identities of the CRAs, their role also as Fraud Prevention Agencies, the data they hold, the ways in which they use and share personal information, data retention periods and your data protection rights with the CRAs are explained in more detail at www.experian.co.uk/crain.

How do we share your information with Fraud Prevention Agencies?

The personal information we have collected from you may be shared with Fraud Prevention Agencies who will use it to prevent fraud and money laundering and to verify your identity. If fraud is detected, you could be refused certain services and/or finance. For these purposes, we are Joint Data Controllers with Synectics (as Fraud Prevention Agency), with their Data Protection Officer being contactable at dpo@synectics-solutions.com for further details of how your information will be used by us and these Fraud Prevention Agencies.

What should you do if your personal information changes?

You should tell us without delay so that we can update our records. The contact details for this purpose are:

Data Protection Officer
West Bromwich Homes Limited
2 Providence Place
West Bromwich
B70 8AF

If you were introduced to us by Leaders Roman Group who is a data controller in its own right, you should contact them separately. In some cases where you exercise rights against us under data protection laws, we may need to inform Leaders Roman Group but this will not always be

the case.

Do you have to provide your personal information to us?

We are unable to provide you with a tenancy or to process your tenancy application without having personal information about you. Your personal information is required before you can enter into the relevant contract with us, or it is required during the life of that contract, or it is required by laws that apply to us. If we already hold some of the personal information that we need – for instance if you are already a tenant – we may not need to collect it again when you make your application. In all other cases we will need to collect it.

Do we do any monitoring involving processing of your personal information?

In this section monitoring means any listening to, recording of, viewing of, intercepting of, or taking and keeping records (as the case may be) of calls, emails, text messages, social media messages, in face-to-face conversations and other communications.

We may monitor where permitted by law and we will do this where the law requires it. In particular, where we are required by the Financial Conduct Authority's regulatory regime to record certain telephone lines or in face-to-face conversations (as relevant) we will do so.

Some of our monitoring may be to comply with regulatory rules, self-regulatory practices or procedures relevant to our business, to prevent or detect crime, in the interests of protecting the security of our communications systems and procedures, to have a record of what we have discussed with you and actions agreed with you, to protect you and to provide security for you (such as in relation to fraud risks on your tenancy) and for quality control and staff training purposes.

Some of our monitoring may check for obscene or profane content in communications.

We may conduct short-term carefully controlled monitoring of your activities during your tenancy where this is necessary for our legitimate interests or to comply with our legal obligations. For instance, where we suspect fraud, money laundering or other crimes.

Telephone calls and/or face to face conversations between us and you in connection with your tenancy may be recorded to make sure that we have a record of what has been discussed and what your instructions are. We may also record these types of calls for quality control and staff training purposes.

Profiling and other automated decision making

This section is relevant where we make decisions about you using only technology, and where none of our employees or any other individuals have been involved in the process. For instance, in relation to transactions on your tenancy and triggers and events such as tenancy renewals. We may do this to decide what direct marketing communications are suitable for you, to analyse statistics and assess lending and insurance risks.

We can do this activity based on our legitimate interests (and they are listed in the section about legal grounds) only where the profiling and other automated decision making does not have a legal or other significant effect on you. In all other cases, we can do this activity only where it is necessary for entering into or performing the relevant contract, is authorised by laws that apply to us, or is based on your explicit consent. In those cases, you have the right to obtain human intervention to contest the decision (see 'Rights in relation to automated

decision making which has a legal effect or otherwise significantly affects you'). Profiling for direct marketing communications can mean there is a separate right to object (see 'right to object').

How long is your personal information retained by us?

Unless we explain otherwise to you, we will hold your personal information for the following periods:

Retention in case of queries. We will retain the personal information that we need to keep in case of queries from you (for instance, if you apply unsuccessfully for a tenancy or service) for 12 months unless we have to keep it for a longer period (see directly below); and

Retention in accordance with legal and regulatory requirements, or in case of claims. We will retain the personal information that we need to keep for the period in which we are required in order to fulfil our legal and/or regulatory requirements, or for the period in which you might legally bring claims against us. This, in practice, means up to 12 years after the end of the tenancy you have with us or, in some cases, longer where we have reason to believe we need to for any of the reasons stated within this paragraph.

If you would like further information about our data retention practices, contact our Data Protection Officer.

What are your rights under data protection laws?

Here is a list of the rights that all individuals have under data protection laws. They do not apply in all circumstances. If you wish to exercise any of them, we will explain at that time if they are engaged or not.

- The right to be informed – we have to be transparent with you about the processing that we do with your personal information. This is why we have a privacy notice.
- The right to have your personal information corrected if it is inaccurate and to have incomplete personal information completed in certain circumstances.
- The right to object to processing of your personal information where it is based on legitimate interests, where it is processed for direct marketing communications (including profiling relevant to direct marketing communications) or where it is processed for the purposes of statistics.
- The right to restrict processing of your personal information, subject to certain criteria being met.
- The right to have your personal information erased (also known as the 'right to be forgotten'). This enables an individual to request the deletion or removal of personal information where there is no compelling reason for its continued processing.
- The right to request access to the personal information held about you. You may make a request in writing (including email) or verbally (e.g. by calling us). There is no charge to make such a request, and we will aim to respond within one calendar month.
- The right to data portability. This allows individuals to obtain and reuse their personal information for their own purposes across different services; to move, copy or transfer their

personal information easily from one environment to another in a safe and secure way without hindrance to usability.

- Rights in relation to automated decision making which has a legal effect or otherwise significantly affects you. This right allows individuals in certain circumstances to access certain safeguards against the risk that a potentially damaging decision is taken solely without human intervention.

You have the right to complain to the Information Commissioner's Office which enforces data protection laws:
www.ico.org.uk

If you wish to exercise any of these rights against the Credit Reference Agencies or the Fraud Prevention Agencies who are data controllers in their own right, you should contact them separately.

Data anonymisation and use of aggregated information

Your personal information may be converted into statistical or aggregated data which cannot be used to re-identify you. It may then be used to produce statistical research and reports. This aggregated data may be shared and used in all the ways described in this privacy notice.

Your marketing preferences and what this means

We may use your home address, phone numbers, email address and social media (e.g. Facebook, Google and message facilities on other platforms) to contact you according to your marketing preferences. This means we do this only if we have a legal ground which allows it under data protection laws. You can stop our direct marketing communications at any time by writing to:

Data Protection Officer
West Bromwich Homes Limited
2 Providence Place
West Bromwich
B70 8AF
Or email: dataprotection@westbrom.co.uk

Alternatively, you can write to:

Data Protection Officer
Leaders Roman Group
Building 1, Meadows Business Park
Blackwater
Camberley
GU17 9AB

Or email their Data Protection Officer at dataprotection@lrg.co.uk