



## De Key Privacy Notice

Woonstichting De Key respects and protects the privacy of its tenants.

We need all kinds of information from our tenants, but do not process more personal data than necessary.

We handle your information with confidentiality.

While processing personal information we adhere to the requirements of The EU General Data Protection Regulation (GDPR) and the Dutch Implementation Act, the UAVG.

We do not use your personal information for purposes other than for which they were intended.

We do not use profiling.

In our privacy notice, we explain how we collect and use personal information from our tenants and for what purpose

[Read our privacy notice](#)



## **Privacy Notice**

**What, why and how  
your personal data is being used**

## Topics

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## 1 Introduction

This privacy notice explains how we process, use and protect personal data.

Woonstichting (social housing foundation) De Key collects personal data from its tenants<sup>1</sup>. As landlord, we need this data to be able to do our work. For instance, we use personal data in order to generate rental agreements. Likewise, we need personal data to collect rent and to contact or notify tenants for repairs or maintenance.

We handle your personal data with care. In order to provide you with service and to comply with the rental agreement we would like to receive all contact information. We like to register additional phone numbers and email so we can reach you when necessary. We do not process more personal data than necessary and protect the data we process from unauthorized use.

We do not share personal data from our tenants with third parties unless it is necessary for our work. We strictly adhere to this rule: tenants must be able to count on the confidentiality of their personal data.

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<sup>1</sup> We use the term tenants in this notice, but the information in this notice is relevant as well for applicants, buyers or suppliers. This Privacy Notice applies to Woonstichting Lieven De Key and all its subsidiaries.

## 2 What personal data do we collect?

De Key collects your personal data. We process this personal data when we prepare rental agreements and other moments of contact with our tenants. Most personal data we receive directly from our tenants. We collect the following data:

- Full name (last, first, middle)
- Gender
- BSN-number (citizen service number)
- Address
- Phone Numbers
- Email
- Date of Birth
- Payment data and account number
- Yearly income/household income
- Household details
- Student number
- Woningnet registration number
- Rental agreement number
- For Keyless and other electronical entry systems: times of use

### **Security cameras and electronical entry systems**

For the safety of tenants and the protection of property De Key sometimes uses security cameras or electronical entry systems (mainly at parking garages). We do this to prevent incidents, crime and vandalism and to protect tenants and their property. Notices are posted at those locations including owner and contact information. The cameras have been placed in a way that they film communal areas only. The filming of public roads and property of others is prevented as much as possible.

We only use the image material and entry data after an incident has occurred and in order to determine if a violation has taken place. The image and/or entry data will be viewed by authorized personnel only and/or when a request has been by the police. The data will be stored for a maximum of 4 weeks or until an incident has been processed.

### 3 Why we collect your data

De Key needs personal data of tenants for the following tasks:

- Renting out, managing and maintaining rentable units, including residential and commercial spaces, residential complexes, rooms and parking garages
- Implementation of housing distribution regulations, including the suitable housing allocation act (*passend toewijzen*)
- Implementation of the income assessment act (*inkomenstoets*) and other legal obligations
- Concluding a rental or purchase and sale agreement
- Collecting the rent and other payments, including placing these claims in the hands of third parties and preventing evictions.
- Carrying out maintenance and renovation by our own craftsmen and women or by third parties.
- Ensuring good living conditions and housing environment.
- Preventing and tackling fraud and nuisance.
- Notifying caregivers
- Selling homes, commercial space and parking spaces.
- Handling disputes and complaints
- Communication with our tenants to provide them with service on all the above points
- Research and surveys on the quality of our service (KWH).
- Internal record keeping (for instance for management information)
- Making payments to creditors (e.g. contractors).
- Calculation of assets, equity, liabilities, obligations, income and expenditure and commissioning audits.
- Analysis for policy making on property and asset management, affordability and availability.
- Performing a service such as Keyless access systems



## **4 How we process your data**

De Key combines personal data to unique codes (for example to the number of your rental agreement) in order to enable communication and to allow us to carry out the above-mentioned tasks. We process no more personal data than necessary for these tasks. We will never publish your personal data without your permission.

### **Confidentiality**

All those who have access to the personal data of our tenants, has signed our nondisclosure agreement.

### **Access to data**

Only those who need it to carry out their work have access to the personal data of our tenants and can process the data if necessary.

### **Data retention**

De Key has a personal data retention policy and does not preserve data longer than necessary. After the established retention period, personal data are securely disposed of or anonymized so it cannot be traced back to a person. We only do so for statistical or trend analysis.

### **Security measures**

We take all necessary and appropriate organizational and security measures in order to prevent unauthorized access, misuse and fraud.

## **5 When we share your data with third parties**

De Key uses the collected personal data for regular operational management. Sometimes it is necessary to share your personal data with third parties, who work for us or parties we work together with.

### **Sharing personal data**

If a third party works for us, like building contractors, debt collectors or the mediators for neighborhood conflicts), we have signed a third party data processor agreement or shared responsibility agreement in which it stated which data they receive for what purpose and how they are allowed to process it on our behalf and according to GDPR requirements only.

Sometimes it is necessary to share personal data with other institutions or the authorities, like the municipality and welfare organizations, in our combined efforts to prevent evictions, deliver care and combat fraud, harassment and crime. In these cases, we have underlying covenants regarding the legal grounds, purpose and use of personal data.

In addition, we may have a legal obligation to share your personal data with the authorities, for example the tax authorities, if they make an official request.

## 6 Your data protection rights

Every tenant has the right to be informed and to access, the right to rectification, erasure, restriction and the right to object to the processing of personal data.

Requests to be informed and to access your data can be made by email (info@dekey.nl), through our website or in writing (to: Woonstichting De Key, Postbus 2642, 1000 CP Amsterdam). When a tenant requests access we will provide a complete overview of all processed personal data, the origin of the data, the third parties that have received the data and the purpose of data processing. In addition, we provide you with a secure self-service system of access through our website.

According to article 41 of the Dutch Implementing Law of the GDPR, we do not share the following data with you:

- Personal notes and notes for internal use without personal data
- Personal data on others, or containing personal data on others, such as neighbors or complaints made by third parties
- Personal data related to public security, crime, civil claims and civil law offences, or the prevention, investigation, detection and prosecution of public security, crime, civil claims and civil law offences as well as enforcement of sanctions and all other exceptions named in article 41.

In order to receive access to your personal data, all you have to do is identify yourself. You can do so by showing us your personal I.D. (the original). If you are younger than 16 or otherwise not authorized to act on your own, your request has to be made by your legal representative, parent or guardian.

We will inform you within 4 weeks.

### **Requests for rectification or removal**

We will rectify or remove personal data that are not correct, incomplete or not necessary for the task they have been collected for. De Key will process the changes as soon as possible and inform possible third parties of the corrections, rectification or removal of data, unless it is impossible or disproportionate to do so.



As long as we have a rental agreement with you, you can not use the right to be forgotten as we will then be unable to comply with the rental agreement. After the rental agreement ends, we will keep your data if we are required by law.

### **The right to object**

Under specific conditions you can object to the use of your personal data, for example for research or quality improvement questionnaires. If you let us know you object to the use of your data, we will decide within 4 weeks if your request is justified. We will not comply with your request if we have a legal obligation to process your data.

We do not use direct marketing or fully automated processing.

## **7 Your data, social media and cookies**

When you use our self-service portal on the website or make an appointment for repairs, you give us permission to use the data you provide us with for the purposes described above. When you send us an email or use the contact form on the website, we save the data you provide us with for as long as it takes to handle your request, complaint or repairs.

[www.dekey.nl](http://www.dekey.nl)

All personal data you provide us with through the website we will process according to this Privacy Notice.

### **Analytical cookies from Google**

On our website, we use Google analytical cookies. We use Google services in order to be able to review how our website is used. We have signed a processor agreement with Google and conceal the last octet of your IP-address so it cannot be traced. We do not allow Google to process the Google analytics information they receive through our website for any other purposes of their own, including other Google services.

## 8 Privacy laws and regulations

The following laws and regulations apply to the subject of this Notice:

- The General Data Protection Regulation (GDPR) of 23/5/2018.
- The Dutch GDPR Implementation Act, called the *Uitvoeringswet Algemene Verordening gegevensbescherming* (UAVG),
- The code of conduct and the governance code of the sector organization of Social Housing organizations in the Netherlands, namely the *Aedescode* en *Aedes Governancecode*. In these codes the social housing organizations of the Netherlands have agreed on a code of integrity and behavior.

### What are personal data?

According to the GDPR, personal data are any and all information which are related to an identified or identifiable natural person. In practice, the GDPR includes all data which are or can be assigned to a person in any way. The combination of a name and date of birth, or contact information, but also a license plate, credit card number or location data are defined as personal.

In addition, the law identifies sensitive personal data categories, including personal information on health, genetics and biometry, religion and ideological convictions, racial and ethnic origin (including photo's), political opinions and trade union membership. These personal data, as well as data about children under 16, are subject to a higher level of protection.

### Lawfulness of data processing

According to article 6 of the GDPR, processing of personal data is legal only based on the following grounds:

- A. Processing is necessary for the performance of a contract or legal agreement or when someone requests signing an agreement, in order to do so (for example for a rental agreement).
- B. Processing the data is necessary for compliance with a legal obligation (e.g. we must process your income in order to comply with The Income Assessment Act).
- C. The processing of your data is necessary for our legitimate interests, unless where your fundamental rights and freedoms are threatened by the use of



your personal data (we like to have nameplates next to the door bell and letterbox but not if this is life threatening for you)

- D. You have given us explicit consent (freely given)
- E. In case of a calamity, in order to protect your or others vital interests
- F. Processing is necessary for a task carried out in the public interest or in the exercise of official authority (this does not apply to De Key as we are not a governmental agency)

### **Processing personal data**

Processing personal data, according to the GDPR, includes the collection, recording, organization, structuring, storage, adaption, alteration, erasure, retrieval, consultation, use, disclosure, sharing etc.; any action and any type of use of your personal data.

According to the GDPR we should work according to the principle of *minimization* and only use personal data when absolutely necessary.