



Defence Infrastructure Organisation

MOD - DIO ACCOMMODATION PRIVACY NOTICE

Personal data

The following is to explain your rights and to give you information you are entitled to under the Data Protection Act 2018.

Please note this refers to your personal data (your name; address and anything that could be used to identify you personally).

Why are we collecting or processing your data?

Your personal data is being collected as part of an SFA/SSFA/SSSA related:

- Application
- Complaint
- Compensation claim (where applicable)
- Dispute of charges process
- Customer satisfaction survey (where applicable)
- Loss of Entitlement process
- Recoverable process

Your data will be used to manage your occupancy throughout the term of your service.

Our legal basis for processing your personal data

The Data Protection Act 2018 states that, as a government department, the MOD may process personal data as necessary for the effective performance of SFA/SSFA/SSSA housing duties and issues.

The legal basis for processing your personal data is:

- Contractual: it is necessary for the performance of a contract to which you are a party – your License to Occupy
- Public Task: processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller, such as the exercise of a function of the Crown, a Minister of the Crown, or a government department; the exercise of a function conferred on a person by an enactment; the exercise of a function of either House of Parliament; or the administration of justice.
- Legal Obligation: processing is necessary for DIO to comply with the UK or EU law (not including contractual obligations).

With whom we will be sharing your personal data

The DIO will share your data with its nominated contractors that may include Pinnacle, Amey, Vivo, Mears Group and Opinion Research Services (ORS). We may share your data with internal MOD agencies (e.g. Pay/Records Office, Local Commands etc). We may be obliged to share your data with external agencies including the Police, Local Authorities and other government departments such as DWP who may request information relating to their investigatory work.

For how long will we keep the personal data, or criteria used to determine the retention period

Your personal data will be held for 60 years in accordance with JSP 375 (Managing Health and Safety in Defence) Part 2 Volume 1 Chapter 39.

After the retention period, has elapsed all data will be destroyed securely in line with MOD data destruction policy.

Your rights

Under Data Protection legislation you have the following individual rights with regards to your personal data:

- The right to be informed about the collection and use of your personal data
- The right of access your personal data and supplementary information
- The right to have inaccurate personal data rectified, or completed if it is incomplete
- The right to data portability, which allows you to obtain and reuse your personal data for your own purposes across different services.
- The right to object to processing in certain circumstances
- Rights in relation to automated decision making and profiling.
- Right to complain to the Information Commissioner

Further information can be found at: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

Transfer of personal data to other countries

Your data will be processed and stored in the UK and will not be sent overseas.

Automated decision making

When applying for SFA via the electronic e1132 the system will calculate your entitlement based on the information that you provided in accordance with the rules as published in JSP 464. You may challenge this calculation in accordance with the guidance as published in JSP 464.

How we store personal data

Your data will be stored in secure IT systems provided by either the MOD or our nominated contractors, or on paper under secure conditions.

How to complain if you are not happy

If you are unhappy with how any aspect of this privacy notice, or how your personal information is being processed, please contact:

In the first instance -

DIO Data Protection Adviser

Email: DIOCIO-DPO@mod.gov.uk

In writing:

Data Protection Adviser

DIO HO

Kingston Road

Sutton Coldfield

B75 7RL

You may also contact -

MOD Information Rights Team
Ground Floor, Zone D
Main Building
Whitehall
London SW1A 2HB

Email: cio-dpa@mod.uk

We will acknowledge your complaint within 5 working days and send you a full response within 20 working days. If we can't respond fully in this time, we will write and let you know why and tell you when you should get a full response.

If you are still not happy, you have the right to lodge a complaint with the Information Commissioner's Office (ICO):

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

Email: casework@ico.org.uk

<https://ico.org.uk/global/contact-us/>