

## CLYDESDALE HOUSING ASSOCIATION

### General Data Protection Regulation (GDPR) Fair Processing Notice

#### Factored Owners

This notice explains what information we collect, when we collect it and how we use this. During the course of our activities we will process personal data (which may be held on paper, electronically, or otherwise) about you and we recognise the need to treat it in an appropriate and lawful manner. The purpose of this notice is to make you aware of how we will handle your information – you are not required to contact us or do anything regarding this.

#### **Who are we?**

Clydesdale Housing Association Limited, a Scottish Charity (Scottish Charity Number SC034228), a registered society under the Co-operative and Community Benefit Societies Act 2014 with Registered Number 2237R(S) and having our Registered Office at 99 High Street, Lanark, ML11 7LN (“we” or “us”) take the issue of security and data protection very seriously and strictly adhere to guidelines published in the Data Protection Act of 1998 and the General Data Protection Regulation (EU) 2016/679 which is applicable from the 25th May 2018, together with any domestic laws subsequently enacted.

We are notified as a Data Controller with the Office of the Information Commissioner under registration number Z5173610 and we are the data controller of any personal data that you provide to us.

Our Data Protection Officer is Jane Guthrie (01555 665316 or [mail@clydesdale-housing.org.uk](mailto:mail@clydesdale-housing.org.uk)). Any questions relating to this notice and our privacy practices should be sent to Jane Guthrie as above.

#### **How we collect information from you and what information we collect**

We collect information about you:

- when you enter in to a factoring agreement with us or otherwise provide us with your personal details;
- from your use of our online services, whether to report any factor related issues, make a complaint or otherwise;

- from your arrangements to make payment to us (such as bank details, payment card numbers, employment details, benefit entitlement and any other income and expenditure related information).

We may collect the following information about you:

|                                |                           |
|--------------------------------|---------------------------|
| Name                           | Address                   |
| Telephone numbers              | Email addresses           |
| Date of birth                  | National Insurance Number |
| Complaints you have made to us | Emergency Contact Details |

We may receive the following information from third parties about you:

- Payments made by you to us;
- Reports regarding behaviour, including information obtained from Police Scotland;
- Reports regarding the condition of your property and your treatment of any relevant communal areas.

**Why we need this information about you and how it will be used**

We need your information and will use your information:

- to undertake and perform our obligations and duties to you in accordance with the terms of our Factoring Agreement with you;
- to enable us to supply you with the services and information which you have requested;
- to enable us to respond to your repair request and complaints made;
- to analyse the information we collect so that we can administer, support and improve and develop our business and the services we offer;
- to contact you in order to send you details of any changes to our or services which may affect you;
- for all other purposes consistent with the proper performance of our operations and business; and
- to contact you for your views on our products and services.

**Sharing of Your Information**

The information you provide to us will be treated by us as confidential and will be processed only by our employees within the United Kingdom (UK)/European Economic Area (EEA). We may disclose your information to other third parties who

act for us for the purposes set out in this notice or for purposes approved by you, including the following:

- If we instruct repair or maintenance works, your relevant information may be disclosed to any contractor;
- If we are investigating a complaint, relevant information may be disclosed to Police Scotland, Local Authority departments, Scottish Fire & Rescue Service and others involved in any complaint, whether investigating the complaint or otherwise;
- If we are updating occupancy details, your relevant information may be disclosed to third parties (such as utility companies and Local Authority);
- If we are investigating payments made or otherwise, your information may be disclosed to payment processors, Local Authority and the Department of Work & Pensions;
- If we are conducting a survey of our products and/ or service, your relevant information may be disclosed to third parties assisting in the compilation and analysis of the survey results;
- If we enter into a joint venture with or merged with another business entity, your information may be disclosed to our new business partners or owners.

Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.

### **Transfers outside the UK and Europe**

Your information will only be stored within the UK and EEA.

### **Security**

We take steps to make sure that your personal information is kept secure and safe.

**Paper Storage:** personal information stored on paper will be kept in a secure place where unauthorised personnel cannot access it. When your information is no longer required it will be disposed of so as to ensure its destruction.

**Electronic Storage:** personal information stored electronically will also be protected from unauthorised use and access. Password protection will be used when your information is sent externally. If your information is stored on removable media (USB memory stick) then that removable media will be stored securely at all times. Your information will not be saved directly to mobile devices.

### **How long we will keep your information**

We review our information retention periods regularly and will only hold your information for as long as is necessary for the relevant activity, or as required by law, or as set out in any relevant contract we have with you. We will generally keep your information for the duration your Factoring Agreement with us and up to 5 years after it ends. After which, this will be destroyed if it is no longer required for the reasons it was obtained. Our full retention schedule is available on request from our offices.

### **Your Rights**

You have the right at any time to:

- ask for a copy of the information about you held by us in our records;
- require us to correct any inaccuracies in your information;
- make a request to us to delete what personal data of yours we hold; and
- object to receiving any marketing communications from us.

If you would like to exercise any of your rights above please contact us at [mail@clydesdale-housing.org.uk](mailto:mail@clydesdale-housing.org.uk) or on 01555 665316.

You also have the right to complain to the Information Commissioner's Office in relation to our use of your information. The Information Commissioner's contact details are noted below:

The Information Commissioner's Office – Scotland

45 Melville Street, Edinburgh, EH3 7HL

Telephone: 0131 244 9001

Email: [Scotland@ico.org.uk](mailto:Scotland@ico.org.uk)

**The accuracy of your information is important to us - please help us keep our records updated by informing us of any changes to your email address and other contact details.**