

# CLYDESDALE HOUSING ASSOCIATION General Data Protection Regulation (GDPR) Fair Processing Notice

#### **Management Committee**

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 39 North Vennel, Lanark ML11 7PT ("we" or "us") take the issue of security and data protection very seriously and strictly adhere to guidelines published in the UK GDPR and Data Protection Act of 2018 (the 2018 Act), together with any domestic laws subsequently enacted.

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

Our Data Protection Officer is Elizabeth Miller (01555 665316 or <a href="mail@clydesdale-housing.org.uk">mail@clydesdale-housing.org.uk</a>). Any questions relating to this notice and our privacy practices should be sent to Elizabeth Miller as above.

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

We collect information about you

- to enable us to perform our contractual obligations. when you apply to join the Committee;
- at internal and/ or external events you are present at in your capacity as a member of the Committee;
- from your use of our online services;



 if you are a tenant, or have applied for a tenancy, through your application and tenancy file (a separate Fair Processing Notice will have already been provided to you).

Under the terms of the tenancy agreement, you are under a required to provide us with the following information:

Name	Address
Telephone numbers	Email addresses
Date of birth	Gender
National Insurance Number	Emergency Contact Details
Complaints you have made to us about	Complaints you have made to us about
our services	anti-social behaviour

We receive the following information from third parties:

- expenses related information, to include bank account details;
- recruitment and selection;
- appraisal, training and development.

# 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 contract with you.

#### This includes:

- to enable us to keep you informed of Committee related matters;
- to allow you to perform your role within the Committee;
- to adhere to regulatory and/ or legislative requirements (e.g. reporting to the Scottish Housing Regulator).

#### **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). 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:

- for recruitment and selection of members of the Committee;
- the circulation of minutes of the Committee;
- Meeting our legal obligation, including disclosure of information we require to provide to regulators and statutory authorities;



- for the purposes of regulation and inspection by OSCR, the Scottish Housing Regulator and any other regulatory body or organisation auditing us;
- if we take payment from you, or reimburse you for whatever reason (e.g. expenses), you information will be disclosed to our Bank;
- 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 we have a lawful basis for disclosure, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.

### <u>Transfers outside the UK and Europe</u>

Your information will only be stored within the UK.

#### Security

When you give us information, we take steps to make sure that your personal information is kept secure and safe. A copy of our Privacy Policy can be found here <a href="Privacy Policy">Privacy Policy</a> | Clydesdale Housing (clydesdale-housing.org.uk)

# How long we will keep your information

We review our data retention periods regularly and will only hold your information for as long as is necessary for the relevant activity, or as required by law (we may be legally required to hold some types of information), or as set out in any relevant contract we have with you. We will generally keep your information for the duration of your tenancy and up to 5 years after your tenancy 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;
- ask us to correct any inaccuracies of fact in your information;
- request that we restrict your data processing
- data portability
- Rights related to automated decision-making including profiling



- make a request to us to delete what personal data of your 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 <a href="mail@clydesdale-housing.org.uk">mail@clydesdale-housing.org.uk</a> or call us 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

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.