

Rutherglen and Cambuslang Housing Association GDPR Fair Processing Notice

(How we use your personal information)

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.

Who are we?

Rutherglen and Cambuslang Housing Association is a Scottish Charity (Scottish Charity Number SC041992), a registered society under the Co-operative and Community Benefit Societies Act 2014 with Registered Number 2029RS and having its Registered Office at 16 Farmeloa Road, Rutherglen G73 1DL takes the issue of security and data protection very seriously and strictly adhere to guidelines published in 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 Z570529 and we are the data controller of any personal data that you provide to us.

Any questions relating to this notice and our privacy practices should be sent to the Senior Housing Officers/Factoring Officer in the first instance.

How we collect information from you and what information we collect

We collect information about you:

- when you apply for housing with us, become a tenant, request services/ repairs, enter in to a factoring agreement with ourselves or otherwise provide us with your personal details
- when you apply to become a member;
- from your use of our online services, whether to report any tenancy/ factor related issues, make a complaint, make a payment 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 collect the following information about you:

- Name;
- Address;
- Telephone number;
- e-mail address;
- National Insurance Number;
- Next of Kin;
- Demographic information – ethnicity, race etc.;
- Benefits information;
- Employment details;
- Medical information;
- Identification documents (to include driving licence, passport, right to reside in the UK)

We receive the following information from third parties:

- Benefits information, including awards of Housing Benefit/ Universal Credit
- Payments made by you to us;
- Complaints or other communications regarding behaviour or other alleged breaches of the terms of your contract with us, including information obtained from Police Scotland;
- Reports as to the conduct or condition of your tenancy, including references from previous tenancies, and complaints of anti-social behaviour
- Information from enquiries by elected members such as councillors and MSP's
- Correspondence from you regarding your contract with us
- Lawyers and other agencies acting on your behalf
- Social work department in respect of adaptations to your property or support needs

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

We need your information and will use your information:

- To enable us to enter into a contract with you
- to undertake and perform our obligations and duties to you in accordance with the terms of our contract 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, housing application 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 supplies 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.
- to apply for funding for adaptations to your property

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 UK/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 information may be disclosed to any contractor;
- If we are investigating a complaint, 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 tenancy details, your 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 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;
- Signposting to Citizens Advice Bureau or similar advice organisations;
- Your address will be shared with the Scottish government if we are applying for funding for an adaptation
- Police Scotland may ask for information in respect of anti-social or general enquiries
- The Associations solicitors may require details of your tenancy if we are taking action against you or seeking advice
- We may share rent details and personal data with SLC Money Matters but only with your consent
- We will be required to share rent and personal data with the DWP in respect of Universal Credit
- We will provide details of your name and address to bulk mailing companies e.g. for the distribution of our newsletter
- If we provide a service specifically to you e.g. garden maintenance your name and address will be shared with the contractor
- Your name, addresses and rent account info information will be shared with Sheriff Officers in the event that we are taking an eviction action against you
- Companies that carry out satisfaction surveys will receive your address but not your name
- Other landlords may ask for details of your tenancy for reference purposes if this has been authorised by you.
- Debt recovery agencies will be given tenancy, employment, national insurance number details if we are pursuing arrears that you have once you have terminated your tenancy with us.
- If we are processing insurance claims made against us;
- If we require I.T. support services from our I.T. providers

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

We may transfer your information outside the UK, this data is stored with the EEA

Personal data is stored on our back up cloud based system which is located in the Netherlands. We ensure that there are adequate safeguards in place to protect your information in accordance with this notice, including the following:

- This is a fully encrypted data storage solution and is secure using encrypted connections and storage.
- It is EU compliant, the European Commission has determined that the Netherlands that has adequate safeguards/ details of appropriate security provisions in place.
- The data centre currently has ISO 27001, 9001, 5001, and 14001 certificates.

Security

When you give us information we take steps to make sure that your personal information is kept secure and safe.

- Paper records – These are stored in the Associations office which has an out of hours monitored alarm system and all methods of storage e.g. filing cabinets and cabinets are lockable.
- Electronic records; All information on our computer network is password protected and staff only have access to those areas that are relevant to their role within the Association. The computer network is protected by the latest ant-virus/ransomware software to guard against external breaches of our network

How long we will keep your information

We review our data retention periods regularly and will only hold your personal data 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 following minimum periods:

Type of record	Suggested retention time
Applicants for accommodation	5 years
Housing Benefits Notifications	Duration of Tenancy
Tenancy files	Duration of Tenancy
Former tenants' files (key information i.e. start finish date)	5 years after termination of tenancy

Type of record	Suggested retention time
Third Party documents re care plans	Duration of Tenancy
Records re offenders. Ex-offenders (sex offender register)	Duration of Tenancy
Lease documents	5 years after lease termination
ASB case files	5 years/end of legal action

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 our website (www.randcha.co.uk) or from our office.

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 your we hold;
- object to, or ask us to restrict, the processing of your personal data; and
- object to receiving any marketing communications from us.

If you would like to exercise any of your rights above please contact us at info@randcha.co.uk or at our office.

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.