

# **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, a registered factor Number PF000345 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 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 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 Factoring Officer in the first instance.

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

We collect information about you:

- when you purchase / become owner or executor of a property that will be factored by us
- if you apply to become a shareholder of the Association;
- from your use of our online services, whether to report 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 (bank card details are not stored on the Association's systems);

- Request for return of account credit (bank account details)

We collect the following information about you:

- Name/s;
- address of property;
- telephone number/s;
- e-mail address;
- billing address if different from property address
- payment card reference
- Please note if you wish a representative to act on your behalf we require permissions from them directly to retain their information for that purpose

We receive the following information from third parties:

- Complaints or other communications regarding behaviour or other alleged breaches of the terms of your contract with us, including information obtained from Police Scotland and South Lanarkshire Council;
- Information from enquiries by elected members such as councillors or MSP's
- Correspondence from you regarding your contract with us
- Lawyers or appointed representative acting on your behalf

### **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
- to enable us to supply you with the services and information which you have requested;
- to enable us to respond to your repair request, insurance queries or claims 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 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;
- Solicitors involved with the sale of your property should you be selling it
- Allpay to process payment
- 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 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;
- Police Scotland may ask for information in respect of anti-social or general enquiries
- The Associations solicitors may require details if we are taking action against you or seeking advice
- We will provide details of your name and address to bulk mailing companies e.g. for the distribution of our newsletter
- Companies that carry out satisfaction surveys will receive your address but not your name
- Debt recovery or insolvency agencies will be given name/s, property address, billing address (if applicable) reason for debt, total debt
- If we are processing insurance claims
- 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 within 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 not generally keep your information once your contract with us is satisfied on termination i.e. when you sell or transfer the property to another party and all accounts are settled. The data 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](http://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; 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](mailto: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](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.