

Board of Management Privacy Notice

This notice explains what personal data we collect, when we collect it and how we use it. 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 a fair, lawful and transparent manner. The purpose of this notice is to make you aware of how we will handle your information.

Dalmuir Park Housing Association (“we” or “us”) is committed to a policy of protecting the rights of individuals with respect to the processing of their personal data and adhere to the Data Protection Act of 2018 and the UK General Data Protection Regulation (EU) 2016/679, together with any domestic laws subsequently enacted.

We are registered as a Data Controller with the Office of the Information Commissioner under registration number Z5642475 and we are the data controller of any personal data that you provide to us. Our Data Protection Officer (DPO) is:

RGDP LLP

Level 2, One Edinburgh Key
133 Fountainbridge
Edinburgh
EH3 9QG

Tel: 0131 222 3239

Email: info@rgdp.co.uk

Any questions relating to this statement and our data protection practices should be sent to admin@dpha.org.uk in the first instance.

What personal data do we hold and use about you?

As part of your membership of the Board, we hold and use the personal information that you provide to us and / or other personal information that we may obtain about you from you and from third parties. This includes, but is not necessarily limited to, your:

- Name;
- Contact information, including address, telephone number, e-mail address and emergency contact / next of kin information;
- Gender;
- Marital status;
- Date of birth;
- Tenure;
- National Insurance number;
- Occupation and employer;
- Nationality;

- Bank account details;
- Recruitment information;
- Declarations of your interests regarding related parties and organisations;
- Absence records, including leave of absence requests and reasons;
- Sensitive personal information about your racial or ethnic origin, sexual orientation, your physical and / or mental health, religious or other similar beliefs and / or political opinions (where you choose to share this with us);
- Criminal records information, including Disclosure Scotland and / or Protecting Vulnerable Groups scheme checks;
- Grievances and / or complaints raised by you or involving you and / or conduct or disciplinary issues involving you;
- Relevant skills and experience;
- Membership of professional bodies and local groups;
- Appraisals, performance reviews and planning;
- Education and qualifications; and
- Training records, including courses attended, strategies and plans.
- Photograph (to identify you on our website);
- CCTV images captured by our CCTV cameras;
- Voice recordings when you make or receive telephone calls;

If you are also a tenant, then we will also hold and use your personal data in accordance with the Privacy Notice issued to our tenants.

The accuracy of your information is important to us – please help us keep our records updated by informing us of any changes to your personal and contact details.

Why do we hold and use this personal information about you?

We use your personal data to:

- Manage and administer your membership of the Board;
- Comply with regulatory requirements and our legal duties and obligations;
- Pay your expenses for attendance at Board meetings;
- Promote equality of opportunity;
- Record absences, including the reason(s) for such absences;
- Carry out required statutory checks;
- Deal with disciplinary and grievance matters;
- Monitor and manage your performance, conduct, development and attendance;
- Protect your vital interests, for example, to notify your next of kin and / or obtain emergency medical assistance in the case of an accident involving you;
- Deliver education and training;
- Protect our personal information and systems and ensure business continuity;
- Undertake business management and planning, including accounting and auditing; and
- Protect and defend our legal rights in the case of a dispute between us.

What is our legal basis for holding and using your personal data?

Data protection laws require us to have a legal reason for holding and using your personal data. The most likely legal bases we will use to process your personal data will be Legal Obligation or Contract. In some circumstances we may use protection of your Vital Interests, Public Interest or if not in relation to our public tasks, Legitimate Interests. If we have no other legal basis for processing, we may seek your Consent.

Who do we share your personal data with?

We may share your personal information with third parties for the purposes described in this notice or for other purposes approved by you. Third parties include:

- Scottish Housing Regulator;
- Disclosure Scotland;
- Our financial advisers, consultants and IT service providers;
- Our solicitors;
- Our insurers; and
- The Police (in the case of actual or suspected criminal activity).

Transfers outside the UK and Europe

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

Security

When you give us personal data we take steps to make sure that it is kept secure and safe. The security measure we have in place are:

- Our premises are security alarmed and fob accessed;
- Our IT systems are actively remotely monitored by our IT support provider
- We only allow staff to access sensitive data on a 'need-to-know' basis or /and some staff have limited access to sensitive data;
- Our staff have the necessary qualifications and integrity to access data and are carefully supervised;
- All of our staff are trained regularly on data protection and some key staff have had more in-depth training;
- Paper data is stored in locked cabinets and is disposed of in secure, locked consoles which are emptied by a confidential waste company. All electronic data and media is stored on a secure server and regularly audited to ensure that no excessive data is being retained. Automatic archiving is also set up on emails and regular archiving is carried out on all data following our retention schedules.
- We have Anti-Fraud policies aimed at preventing frauds and we have clear desks; policy and ensure we practice appropriate telephone call handling;
- We securely process electronic and paper data are transmitted/moved from place to place by using encrypted USB sticks or ensure documents are password protected.

How long do we keep your personal information?

We review our data retention periods regularly and will only keep your personal information for as long as we need to for the purposes described in this notice or as set out in the contract we have with you or as required by law.

What rights do you have in relation to your personal data?

You have rights in relation to your personal data and can ask us for the following:

- To access information about the personal data we are processing and to obtain a copy of it;
- To change incorrect or incomplete data;
- To erase or stop processing your data (in certain circumstances);
- To stop sending you marketing messages; and
- To object to certain processing activities.

These rights are qualified and are not absolute but if you would like to exercise any of your rights, please email: admin@dpha.org.uk

If you remain unsatisfied after your request has been processed by us, you also have the right to complain to the Information Commissioner's Office in relation to our use of your personal data. The Information Commissioner's contact details are below:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Website: www.ico.org.uk

If you would like to receive this statement in alternative format, for example, audio, large print or braille, please email: admin@dpha.org.uk

Last updated: July 2022
Reviewed June 2025