

Privacy Notice

(How we use your personal information)

This notice explains what information we collect, when we collect it and how we use this. During 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?

Dalmuir Park Housing Association (DPHA) is a Scottish Charity (Scottish Charity Number SC033471), a registered society under the Co-operative and Community Benefit Societies Act 2014 with Registered Number 1917 R(S) and have our Registered Office at Beardmore House 631 Dumbarton Road, Dalmuir, Clydebank. G81 4EU.

We take the issue of security and data protection very seriously and strictly adhere to guidelines published in 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.

How we collect information from you and what information we collect

We collect information including personal data about you and you provide information including personal data to us so that we can provide information and services to you:

- When you apply for housing with us, become a tenant, request services/repairs, enter into a factoring agreement with ourselves howsoever arising or otherwise provide us with your personal details
- When you apply to become a member
- When you use our online services, whether to report any tenancy/factor related issues, make a complaint or otherwise

- From your arrangements to make payment to us (such as bank details, payment card number, employment details, benefit entitlement and any other income and expenditure related information)
- When your image is captured by our CCTV cameras
- When you supply services to us
- When you visit our website, offices and estates/properties
- When you apply for a job with us
- When you request or are in receipt of our services

The information we collect includes but is not necessarily limited to:

- **Personal details:** name, date of birth, next of kin details, medical details, marital status, signature, immigration / residential status;
- **Contact details:** address, telephone numbers, e-mail address;
- **Equality details:** ethnicity, disability details, religious belief, gender identification, sexual orientation;
- **Household details:** housing applicant's current accommodation and all family members to be re-housed;
- **Tenancy details:** start and end dates, rent paid, under/over payments, warnings about unacceptable behaviour or vulnerable tenant, housing history, economic status;
- **Payment details:** name of bank, account number, sort code, third party payment details;
- **Repairs requested:** access details, completion dates, satisfaction;
- **Personally Identifiable:** rent/factoring account number, All-pay card reference number, shareholder membership number;
- **Purchase/Buy back details:** mortgage provider, solicitor details;
- **Employment/Benefits:** benefits/council tax status and payments, National Insurance number, occupation, employer name and address and contact number, income details, grants;
- **Complaints:** date received, date responded, complaint details, outcome, upheld or not;
- **Images:** event photographs, CCTV images;
- **Health Care Details:** vulnerabilities – e.g. sight, hearing impairments, drug/alcohol dependency issues, third-party authority and information (name, address, nature of relationship to tenant) details of support being received or required from external agencies (name of support worker, name of external agency).

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.

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

- Benefits information, including awards of housing benefit/ universal credit from the job centre or DWP or money advice agencies;
- 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;
- Social services, mental health agencies, GP's, hospitals or support workers.

Why we need this information about you and the legal bases we use for processing:

We need your information and will use your information lawfully in order to provide information and services to you. For example:

- 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 including newsletters, website and our annual report;
- to protect your interests and / or the interests of others;
- to contact you for your views on our products and services.
- because we may have a legal obligation to do so or it is in the public interest or it is in our legitimate interest to do so.

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 enter into a joint venture with or merged with another business entity your information may be disclosed to our new business partners or owners;
- 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 the Local Authority);

- If we are investigating payments made or otherwise, your information may be disclosed to payment processors, local authority and the DWP;
- 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.
- To obtain legal advice or take legal action;
- To adhere to our statutory requirements to report to the Scottish Housing Regulator and notify the Local Authority in the event of court proceedings being raised to recover possession of a tenancy;
- If you wish to access our Welfare Rights service;
- To allow you to make payment to us through third party organisations;
- To Sheriff Officers, debt collection agencies and tracing agents in connection with any enforcement action;
- If we are processing any insurance claim made against us we will forward the claim to our insurers
- Other third parties in order to provide our services to you

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.

Transfers outside the UK and Europe

We will only process your information within the UK and EEA.

Security

When you give us information including personal data, we take steps to make sure that it is kept secure and safe. Security measures we have in place include:

- 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 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.

Our retention policy and schedule is available on request. For a copy, please email **admin@dpha.org.uk**.

Your Rights

You have rights in relation to your personal data and can ask:

- 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.

If you would like to find out more about how we use your personal data, wish to exercise any of your rights or make a complaint, please contact the Corporate Services Team via email:

admin@dpha.org.uk.

You may also contact our DPO:

Tel: 0131 222 3239 / 07741 738842

Email: **info@rgdp.co.uk**

If you remain unsatisfied after your complaint 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 information. 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**

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