



Craigdale Housing Association

CUSTOMER PRIVACY NOTICE

(Tenants, Shared Owners & Factored Owners)

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 process your personal data.

Who are we?

Craigdale Housing Association, registered as:

a Scottish Charity (Scottish Charity Number SCO31879),
a registered society under the Co-operative and Community Benefit Societies Act 2014 with Registered Number 2296 RS
Registered with the Scottish Housing Regulator, Number HCB 95
a Property Factor, Registered Number PF000223

and having their Registered Office at: **83-85 Dougrie Road, Castlemilk, Glasgow, G45 9NS**

Craigdale Housing Association takes the issue of security and data protection very seriously, including compliance with the UK General Data Protection Regulation, the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations.

We are notified as a Data Controller with the Information Commissioner's Office under registration number Z5480995 and we are the data controller of any personal data that you provide to us.

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, shared owner, 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;
- from your use of 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 numbers, employment details, benefit entitlement and any other income and expenditure related information);
- when you use our Welfare Advice service. This is a joint service we deliver in partnership with Southside Housing Association. To see further information, visit: <https://southside-ha.org/southside-services/welfare-rights-service/>
- Any other instance where you provide us with your personal information.

We may collect the following information about you:

Personal details:	your name, addresses, date of birth, other household members, forwarding address(es)
Contact details:	home phone number, mobile phone number and email address, address
Further details:	NI number, gender, ethnicity, disability, health and medical details, marital status, signature, unacceptable behaviour warnings and other protected characteristics data, as defined by the Equalities Act 2010, provided by you
Household composition	details of existing accommodation arrangements and family members seeking accommodation with the applicant

Tenancy Details:	start and end dates, rent paid, under/over payments, Factoring Account Details, payments and arrears
Payment details:	bank account details, 3 rd party payment details
Repairs:	repairs requested, access details, completion dates, re-chargeable repairs
Pseudonymous data:	CHA customer account numbers, rent reference number, share membership number, housing benefit or welfare benefit reference numbers
Employment:	benefit/council tax status and payments, employment history, education history, tax code, trade union membership, Employment application details, asylum status, criminal record declaration
Location:	IP address when you access our website
Images:	event photographs or photo identification
Voice Recordings:	Dependent upon what information you divulge during any/all conversations with us, or if you leave a voice-mail

We may also record factual information whenever you contact us or use our services, as well as information about other action we take, so that we have an accurate record of what happened.

We may 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, Social Services and/or Local Authorities
- Reports as to the conduct or condition of your tenancy, including references from previous tenancies, and complaints of anti-social behaviour
- Medical reports for medical adaptations and Social Work reports for applications
- Tracing and Employment details from debt collection agencies
- Title Deeds
- Information supplied by the relevant local council with regards to a homeless application.

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
- Enable us to supply you with the services and information that you have requested
- Enable us to respond to your repair request, housing application and complaints made
- Analyse the information we collect so that we can administer, support, improve and develop our business and the services we offer
- Contact you in order to send you details of any changes to our or suppliers that may affect you
- Progress all other purposes consistent with the proper performance of our operations and business; and
- Contact you for your views on our products and services.

Sharing of your information

We may disclose your personal data to any of our employees, officers, contractors, insurers, professional advisors, agents, suppliers or subcontractors, trusted third parties and healthcare providers insofar as reasonably necessary, and in accordance with data protection legislation.

We may also disclose your personal data:

- with your consent
- to the extent that we are required to do so by law
- to complete any regulatory returns
- to protect the rights, property and safety of us, our customers, users of our websites and other persons
- in connection with any ongoing or prospective legal proceedings
- If we are investigating a complaint, information may be disclosed to solicitors, independent investigators such as auditors, the Scottish Housing Regulator and other regulatory body involved in any complaint, whether investigating the complaint or otherwise
- to the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling
- to another organisation if we enter into a joint venture or merge with another organisations.

What are the legal bases for us processing your personal data?

We will only process your personal data on one or more of the following legal bases:

- contract
- consent
- our legitimate interests
- vital interests
- public interest / official authority
- legal obligation

Transfers outside the UK and Europe

Your information will only be stored within the UK and European Economic Area except where international transfers are authorised by law.

Security

When you give us information, we take steps to make sure that your personal information is kept secure and safe. All information is kept in line with our data protection policies and procedures.

We will not usually retain your payment details unless you make payments to us Using Direct Debit.

Our computer systems are located in our main office however, our staff may occasionally use laptops, tablet or other devices offsite, i.e., for homeworking. In instances where devices are used remotely this will be secure and under strict control at all times.

Additionally, we have the following controls in place to ensure the security of your personal information:

- All paper-based records are securely locked in storage cupboards when not actively being Used.
- Our offices are protected by an alarm system and a security company
- All Craigdale Housing Association computer servers are within a secure network
- Systems are password protected, patch updates to our servers are implemented and we regularly review system access rights.
- All electronic communication takes place within this secure environment.

The unauthorised use of IT systems is prevented by:

- User ID
- Password assignment
- Lock screen with password activation

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 periods as recommended by law. Once the periods have expired, the information will be destroyed if it is no longer required for the reasons it was obtained. Our full retention schedule is available by contacting the office on 0141 634 6473, emailing us on dataprotection@craigdaleha.co.uk or from the website: www.craigdaleha.co.uk/

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
- in certain situations, make a request to us to delete your personal data
- request we restrict processing your personal data
- object to the processing

- object to us processing your personal data; and
- right to portability

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.

Queries and Complaints

Any questions relating to this notice and our privacy practices should be directed, in the first instance, to dataprotection@craigdaleha.co.uk or by telephoning 0141 634 6473.

Our Data Protection Officer is provided by RGDP LLP and can be contacted either via 07935-008-316 or info@rgdp.co.uk

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
Queen Elizabeth House
Sibbald Walk
Edinburgh
EH8 8FT

Telephone: 0303 123 1113

Email: Scotland@ico.org.uk

Online: Make a complaint | ICO