



## **GDPR Privacy Notice**

**From the 25th of May 2018, Hillhead Housing Association 2000, along with all other companies within the UK, will be subject to the rules set in the General Data Protection Regulation (GDPR).**

The Association is deemed a 'data controller' by the Information Commissioner's Office (ICO) and is required to implement working practices which meet with the requirements of this legislation.

To allow us to deliver our service, we are required to hold data on our customers. We have to be clear about what information we collect from you, how we hold it, who we share it with, and how we dispose of it.

All customers have the right to access their information, request any changes, and to have their data deleted in line with the Regulation.

## **Information that we hold**

### **We collect information about you from:**

- Housing Applications;
- Tenancy Sign up documents;
- Tenancy Management Correspondence;
- Repair Requests;
- Membership of the Association;
- Use of online services, including social media;
- Any financial transactions including benefits entitlements, and or any income and expenditure related information;
- Any other instance where you provide us with your personal information.

### **We collect the following information about you and your household:**

- Name;
- Address;
- Gender;
- Date of birth;
- Telephone numbers;
- E-mail address;
- National Insurance Number;
- Next of kin or emergency contact;
- Ethnicity;
- Medical / disability information;
- Housing Benefits reference number;
- Sex Offender Register details
- Bank Details
- Proof of income

### **We receive the following information from third parties:**

- Benefits information, including awards of Housing Benefit/ Universal Credit;
- Payments made by you via bank transfer, Allpay or any other method;
- 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 landlords;
- Information supplied by the relevant local council with regards to a homeless application;
- Medical information concerning you or a household member from NHS Practitioners and Occupational Therapists

### **Reason for holding this information**

- to undertake and perform our obligations and duties in relation to the services we provide;
- to respond to repair requests, medical adaptation requests, housing applications or complaints;
- To enable us to protect your vital interests or those of another person in connection with your welfare matters;

- to use the information to improve and develop our business and the services we offer;
- to keep customers updated on any changes to our supplies or services;
- for all other purposes consistent with the proper performance of our operations and business; and
- to request views on our products and services.

## **Sharing of Your Information**

**The information provided to us will be treated as confidential and will be processed only by our employees within the UK. We may disclose 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 our contractors;
- 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);
- Your information may be shared with our solicitors and auditors;
- 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 have concerns about your ability to manage your tenancy, we may share information with the Local Authority Social Work Department and Homeless Casework Team;  
If you access our Welfare Rights or Tenancy Support Services, your information may be disclosed, with your consent, to contact statutory, voluntary or third sector organisations in connection with your welfare;
- Your data may be shared with the Department of Work and Pensions, local Authorities or any other relevant department to facilitate the payment of any benefits;
- As requested by the local authority with regards to the processing of council tax or electoral registrar;
- If requested by an emergency service.

**Unless required to do so by law, we will not otherwise share, sell or distribute any of the information provided to us without consent.**

## **Transfers outside the UK and Europe**

Customer information will only be stored within the EEA (European Economic Area).

## **Security**

We take steps to make sure that personal information is kept secure and safe. All data is held in accordance with Hillhead Housing Association 2000's Privacy Policy, a copy of this is available on request. Our systems are password protected and all electronic data is stored securely. All paper files are kept in locked cabinets.

### **How long will we hold data?**

We review our data retention periods regularly and will only hold personal data for as long as is necessary for the relevant activity, required by law, or as set out in any relevant contract we have with you.

### **Customer's Rights**

#### **Customers have the right at any time to:**

- ask for a copy of the information held by us in our records;
- require us to correct any inaccuracies in information held;
- make a request to us to delete any personal data which we hold;
- object to receiving any marketing communications from us.

If you would like to exercise any of your rights please contact Mandy White, Corporate Services Manager on 0141 578 0200 or email [mwhite@hillheadhousing.org](mailto:mwhite@hillheadhousing.org)

You have the right to complain to the Information Commissioner's Office in relation to 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 information held is important to us -  
please help us keep our records updated by  
informing us of any changes to your contact details.**

Hillhead Housing Association 2000 is a Scottish Charity (Scottish Charity Number SC029908), a registered society under the Co-operative and Community Benefit Societies Act 2014 with Registered Number 2562R(S) and having its Registered Office at 2 Meiklehill Road, Hillhead, Kirkintilloch G66 2LA.

We take 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 Z8278640 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 **Mandy White, Corporate Services Manager**, by phone on **0141 578 0200**, or e-mailed to [mwhite@hillheadhousing.org](mailto:mwhite@hillheadhousing.org)