

GDPR Fair Processing Notice

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?

Calvay Housing Association, a Scottish Charity (Scottish Charity Number SC039234), a registered society under the Co-operative and Community Benefit Societies Act 2014 (No 2194RS) and having our Registered Office at The Calvay Centre, 16 Calvay Road, Barlanark, Glasgow, G33 4RE 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, together with any domestic laws subsequently enacted.

We are notified as a Data Controller with the Information Commissioner's Office (ICO) under registration number Z4998027 and we are the data controller of any personal data that you provide to us.

Our Data Protection Co-ordinator is Tracy Boyle, tracy@calvay.org.uk, 0141 771 7722. Any questions relating to this notice and our privacy practices should be sent to Tracy Boyle at the details above.

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 Regulations.

Information that we hold

We collect information about you from:

- Your Housing Application
- Tenancy Sign up documents
- Tenancy Management Correspondence
- Repair Requests
- Factoring Agreement
- Membership of the Association Forms
- 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/Nationality
- Details concerning health or any disability
- Housing Benefit or Universal Credit reference number
- Economic Status
- Marital Status

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 & Community Safety Glasgow
- Reports as to the conduct or condition of your tenancy, including references from previous tenancies, and complaints of anti-social behaviour
- Information relating to any homeless application you may have submitted, supplied by the relevant local council

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 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
- To request views on our products and services
- To be able to demonstrate that no applicant for housing is being unfairly discriminated according to protected characteristics.

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 some personal 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, we may disclose any relevant information to the contractor to carry out the work
- 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, we may disclose any relevant information to third parties (such as utility companies and Local Authority)
- 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
- 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 Calvay's Privacy Policy, a copy of this is available on our website and from our office.

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, or as required by law, or as set out in any relevant contract we have with you.

Customers 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

As of 11 November 2019, Calvay Housing Association Ltd is deemed to be a Public Authority under the Freedom of Information (Scotland) Act 2002 and is, therefore, required to appoint a Data Protection Officer (DPO). We have engaged RGDP LLP (www.rgdp.co.uk) to act as our Data Protection Officer.

To contact them, please email info@rgdp.co.uk Please also copy us in at: dpo@calvay.org.uk

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: 0303 123 1115

Email: 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.

Updated: November 2019