

# **Almond Housing Association**

## **GDPR Fair Processing Notice:**

### **How we use your personal information**



This notice explains what information we collect, when we collect it and how we use it. In our activities we will process personal data about you (held on paper, electronically, or otherwise) 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 we are**

We are Almond Housing Association Ltd., registered with the Scottish Housing Regulator No HAL 285, a registered Scottish Charity No SC031696, a registered society under the Co-operative and Community Benefit Societies Act 2014 with Registered Number 2471R(S) and having their Registered Office at 44 Etive Walk, Craigshill, Livingston EH54 5AB.

We take the issue of security and data protection very seriously and strictly adhere to guidelines published in the General Data Protection Regulation (EU) 2016/679 (applicable from 25 May 2018), together with any domestic UK laws on data protection.

We are registered with the Information Commissioner's Office, registration number Z4868537, and are the data controller of personal data that you provide to us.

We have appointed a Data Protection Officer who sits within our Corporate Section.

If you have any queries about this notice, how we use your personal information, or if you require a copy of this notice in an alternative format (such as large print, Braille or audio recording), you can write to us at our registered office address above, or on the following details:

Email: [enquiries@almondha.org.uk](mailto:enquiries@almondha.org.uk)

Phone: 01506 439291

#### **What is the West Lothian Housing Register?**

Almond Housing Association, Weslo Housing Management and West Lothian Council work together to operate the West Lothian Housing Register. This means that you only need to fill in one housing application form to be listed for all three housing providers. The personal information you provide us with in your application form is shared between all three landlords.

Any questions relating to how our partners in the West Lothian Housing Register collect and process personal data should be sent to:

- Weslo Housing Management: [enquiries@weslohm.co.uk](mailto:enquiries@weslohm.co.uk)
- West Lothian Council: [customer.service@westlothian.gov.uk](mailto:customer.service@westlothian.gov.uk)

## **How we collect information from you and what information we collect**

We collect information about you in the following circumstances:

- when you apply for housing with us, become a tenant, request services/ repairs, enter in to a factoring agreement with ourselves howsoever arising or otherwise provide us with your personal details;
- when you apply to become a member of the Association or a Board Member;
- from your use of our online services, whether to report any tenancy/factor related issues, report a repair, make a complaint or otherwise;
- when you take part in an online survey, provide us with your personal details on social media (Facebook and Twitter) or fill in our website contact form;
- 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).

We collect the following information about you:

- name
- date of birth
- address
- telephone number (landline and mobile)
- e-mail address
- National Insurance Number
- payment and bank details
- next of kin, and members of your household

When you apply for housing with us we also collect the following information about you:

- any representative's details
- address history for the last three years
- gender
- marital status
- ethnic origin and language
- immigration status
- details of any disability
- household details, including details of any pregnancy
- details of any pets
- any criminal convictions data

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

- Benefits information, including awards of Housing Benefit or 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.
- Reports as to the conduct or condition of your tenancy, including references from previous tenancies, and complaints of anti-social behaviour.

## **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;
- 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 or any complaints;
- to analyse the information we collect so that we can administer, support and improve and develop our business and the services we offer;
- to send you details of any changes to our services which may affect you;
- to send you correspondence, including the quarterly tenant newsletter;
- to take payments from you, including for factoring accounts from Factored Owners; and
- to contact you for your views on our services.

## **What is our legal basis for using your personal information?**

We will only use your personal information where it is permitted by law and where:

- we need to use your personal information to perform our contract with you;
- we need to use your personal information to comply with our legal or regulatory obligations as a housing association and registered charity;
- you have given us your consent to use your personal information for a particular purpose (if consent is needed we will ask this from you separately); and
- it is in our legitimate interests to process your personal information (such as our legitimate interests to identify improvements in our services to you, and our legitimate interests to obtain feedback on our services) and there is no disadvantage to you or risk to your personal information.

If you do not provide us with the personal information we request from you, we may not be able to offer you our services, or continue to administer any services that you have with us.

## **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 or third party suppliers based within the UK.

We may disclose your information to other third parties 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 merge 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, West Lothian Council 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 West Lothian Council);

- If we are investigating payments made or otherwise, your information may be disclosed to payment processors, West Lothian Council and the Department of Work & Pensions;
- If we are conducting a survey of our services, your information may be disclosed to third parties assisting in the compilation and analysis of the survey results; or
- If we make a referral for specialist support such as tenancy support, welfare benefits and fuel poverty services, your information will be disclosed to the relevant agency.

Unless required to do so by law, 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 may transfer your information outside the UK and/or EEA if we sign you up for the Dolly Parton Imagination Library scheme. We are working in partnership with the US-based Dolly Parton Imagination Library to provide free books for tenants' children who are aged between 0-5. In order for the charity to be able to send you free books they use personal data (names and addresses and child details) provided by us.

Where information is transferred outside the UK or EEA we ensure that there are adequate safeguards in place to protect your information in accordance with this notice, including:

- having a contractual agreement in place; and
- ensuring that the information we share is stored securely.

The data we share with the Dolly Parton Imagination Library is stored in the USA within a dedicated server with strict access limitation and which is password protected and encrypted.

### **Security**

We take the following measures to ensure any personal information you give us is kept secure:

- We work in secure offices with restricted access.
- We use password protected IT systems and software with restricted access.
- We make regular backups of files.
- We protect ourselves against viruses and malware.
- We have secure onsite and offsite storage systems for paper files.
- We have a secure website.

A copy of our Openness & Confidentiality policy is available on request.

### **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 is required by law (we may be legally required to hold some types of information for a certain period), or as set out in any relevant contract we have with you.

Generally, we will hold your information for up to [5 years] after the end of your contract with us.

After the relevant retention period has expired, the information will be securely destroyed or otherwise put beyond use.

Further details about our information retention and deletion policies is available on request.

## Your rights

You have various rights in respect of the personal data we hold about you – these are set out in more detail below.

- **Right to object:** You can object to our processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. Please contact us as noted above, providing details of your objection.
- **Access to your personal data:** You can request access to a copy of your personal data that we hold. You can make a request for access free of charge. Please make all requests for access in writing, and provide us with evidence of your identity.
- **Consent:** Where you have given us your consent to use your personal data, you can withdraw your consent at any time.
- **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal data held about you.
- **Erasure:** You can ask us to delete your personal data where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.
- **Portability:** You can ask us to provide you or a third party with some of the personal data that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.
- **Restriction:** You can ask us to restrict the personal data we use about you where you have asked for it to be erased or where you have objected to our use of it

If you would like to exercise any of the above rights please email us at: [enquiries@almondha.org.uk](mailto:enquiries@almondha.org.uk)

You also have the right to complain to the Information Commissioner's Office regarding our use of your information. The Information Commissioner's Office - Scotland contact details are:

45 Melville Street  
Edinburgh  
EH3 7HL

[www.ico.org.uk](http://www.ico.org.uk)  
[Scotland@ico.org.uk](mailto:Scotland@ico.org.uk)  
0303 123 1115

The accuracy of your information is important to us - please help us keep our records up to date by letting us know of any changes to your email address, phone number or any other contact details.