



Almond Housing Association Ltd and Almond Enterprises Ltd Board Privacy 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, registered Scottish Property Factor No PF000181, 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 are registered with the Information Commissioner's Office, registration number Z4868537, and are the data controller of personal data that you provide to us.

Our subsidiary, Almond Enterprises Ltd, is registered in terms of the Companies Acts with registered number SC281724, and having their Registered Office at 44 Etive Walk, Craigshill, Livingston EH54 5AB. Almond Enterprises Ltd is also registered with the Information Commissioner's Office, registration number Z3475588, and is the data controller of personal data that you provide to it.

We take the issue of security and data protection very seriously and strictly adhere to guidelines published in the UK General Data Protection Regulation and the Data Protection Act 2018.

We have appointed a Data Protection Officer, this role is carried out by our Governance and Business Improvement Manager.

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 Phone: 01506 439291

What information we collect

We collect the following information from you, both from information you have supplied through membership of the Association forms or any other instance where you have provided us with your personal information. We may collect the following:

- Name, address, telephone number, e-mail address, and any other contact information.
- date of birth.
- Protected characteristics data, as defined by the Equality Act 2010.
- Any relevant health and safety information (including disability information).
- Qualifications, references, employment history, and professional memberships.
- Register of interests including interests of close connections.
- Eligibility criteria for Board
- Images captured by CCTV at our office

Why we collect your data

We collect and use the above information and personal data for:

- | | |
|--|---|
| - Administration duties | - Health, safety and wellbeing |
| - Payment of any out-of-pocket expenses | - Equality monitoring |
| - Recruitment and selection | - Regulatory reporting |
| - Appraisal, training and development | - Membership of professional bodies |
| - Bank money laundering requirements and identity checks (some banks may run 'soft' credit checks) | - Businesses we work with may carry out identity checks |
| | - Legal requirements |

How we collect information

We collect information including personal data about you when:

- You join our Board through our recruitment and induction process.
- You provide us personal data, for any business reason.
- Our lawful basis for collecting data may be based on consent, legitimate interest, public task, legal obligation, vital interest.
- When we are handling information that is sensitive, known as special category data, we may use additional lawful basis such as explicit consent, vital interest or legitimate interest.
- When you take part in surveys
- CCTV imagery

Sharing of your information

We may disclose your personal data to any of our employees, contractors, insurers, professional advisors, banks, agents, partners, auditors, suppliers 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 a regulatory return.
- 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 another organisation we do business with (such as AllPay)
- to another organisation if we enter into a joint venture or merge with another organisations.
- to banks for money laundering checks and/or identify checks
- to other organisations who may undertake a credit check which is in the legitimate interest of the organisation
- AEL Board members registered with Companies House may have finance checks carried out under Legal Obligation in line with Government instruction

What are the lawful bases for us processing your personal data

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

- consent
- vital interests
- legal obligation
- our legitimate interests (including CCTV recordings)
- public task in the public interest / official authority
- contract - where applicable

Special categories of personal data

Special categories of personal data means information about your racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; health; sex life or sexual orientation; criminal convictions, offences or alleged offences; genetic data; or biometric data for the purposes of uniquely identifying you.

The "special categories" of sensitive personal information referred to above require higher levels of protection. We need to meet additional legal requirements for collecting, storing and using this type of personal information.

Transfers outside the UK

Your information will only be processed within the UK, except where international transfers are authorised by law.

Security

When we process your personal data we take steps to make sure that your personal information is kept secure and safe. This includes ensuring there is adequate IT and physical security for all locations that data is stored and we ensure that these measures are tested on a regular basis to ensure compliance.

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 required by law / best practice or as set out in any relevant contract we have with you. Our full retention guidelines are available on our website, or a copy can be requested from our registered office.

Your rights

You have the right at any time to request us to exercise your data subjects' rights in relation to the following:

- the right to be informed
- the right to access
- the right to rectification
- the right to object to processing
- the right to be forgotten
- the right to data portability
- the rights to restrict processing

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. If you would like to exercise any of your rights above please contact our Data Protection Officer: enquiries@almondha.org.uk or 01506 439291.

Queries and concerns

If you would like to find out more about how we use your personal data or want to see a copy of information about you that we hold or wish to exercise any of your above rights, please contact our Data Protection Officer: enquiries@almondha.org.uk or 01506 439291

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:

Queen Elizabeth House
Sibbald Walk
Edinburgh
EH8 8FT
www.ico.org.uk
Scotland@ico.org.uk
0303 123 1115

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.