



Almond Housing Association Ltd and Almond Enterprises Ltd Employee 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 through a variety of resources (i) directly from you; or (ii) third parties (including employment agencies, Government agencies and previous employers).

- Name, address, telephone number, e-mail address, and any other contact information.
- National Insurance number.
- Next of kin and emergency contact details.
- Date of birth.
- Protected characteristics data, as defined by the Equality Act 2010.
- Qualifications, references, employment history, and professional memberships.
- Absence and medical information.
- Pension, personal tax, and bank account information.
- Driving licence and car insurance (if applicable).
- Business travel details.
- Your declared interests and those of your close connections.
- Your eligibility of right to work in the UK.
- CCTV imagery.
- Call recordings.
- Your opinions through employee surveys.
- Location data via our lone working devices

Why we collect your data

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

- Administration in relation to your employment
- Payment of salaries
- Recruitment and selection
- Pensions and associated benefits
- Membership of professional bodies
- For complying with laws and regulations, such as health and safety legislation
- To administer employee benefits
- To check your eligibility of right to work in the UK
- Absence management
- Training and development purposes

How we collect information

We collect information including personal data about you when:

- Apply for a job with us via application forms, references, and other relevant pre-employment checks (e.g. Disclosure Scotland checks and any health related information relevant to your role).
- Enter into a contract of employment with us (through relevant employment policies, such as managing attendance, performance management, etc.)
- Provide us personal data, for any business reason.
- We may also receive relevant information from a third party which may impact your engagement with us, as an employee or potential employee.
- Staff may be captured by CCTV systems, and we may use CCTV footage for security and disciplinary purposes
- Staff surveys
- During your employment, there may be reason to monitor use of email, internet, IT systems, and company devices to ensure these are not being used for improper or inappropriate purposes.
- We may monitor use of company devices to ensure these are not excessively being used for personal purposes

- You use our lone working safety devices for visits outside of the office
- 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, we may use additional lawful basis such as employment, explicit consent, vital interest or legitimate interest.

Sharing of your information

We may disclose to and share information about you with third parties for the purposes set out in this notice, or for purposes approved by you, including the following:

- To manage your employment or potential employment with us;
- To process your monthly salary payments;
- To allow your pension provider to process pensions information and handle your pension; and
- If we enter into a joint venture with or is sold to or merged with another business entity, your information may be disclosed to our new business partners or owners.

What are the lawful bases for us processing your personal data

Under the UK General Data Protection Regulation, the lawful bases which we rely on for processing this information are:

- We have your consent
- We have a contractual obligation, including pre-contractual negotiations
- We have a legal obligation
- We have a vital interest
- We have a legitimate interest
- Where we are undertaking a public task

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 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. Our cloud-based telephony system, Dialpad, may process your information outside of the UK, however we are assured that adequate safeguards are in place to protect your personal data, as set out in a contract and data processor agreement.

Security

Your information will only be stored within the UK, other than where international transfers of personal data may legally take place, in accordance with Chapter V of the UK General Data Protection Regulation.

When you give us information, we take steps to make sure that your personal information is kept secure and safe. This includes ensuring there is appropriate

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.

We 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.

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

Under data protection law, you have certain data subjects' rights including:

Your right of access	You have the right to ask us for copies of your personal information.
Your right to rectification	You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
Your right to erasure	You have the right to ask us to erase your personal information in certain circumstances.
Your right to restriction of processing	You have the right to ask us to restrict the processing of your personal information in certain circumstances.
Your right to object to processing	You have the right to object to the processing of your personal information in certain circumstances.
Your right to data portability	You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances

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 in relation to 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.