

September 2021

# Privacy Notice

## Customers



### WHO WE ARE:

This Privacy notice explains what information Eildon Housing Association (“we” or “us”) collects, when we collect it and how we use it. 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. This notice is to make you aware of how we will handle your information.

We are committed to protecting the rights of individuals with respect to the processing of their personal data. We adhere to the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR), together with any domestic laws subsequently enacted. For the purposes of this document a customer is someone who receives the following services from Eildon Housing Association: housing and / or care and support services.

We are notified as a Data Controller with the Office of the Information Commissioner under registration number Z7231896, and we are the ‘Data Controller’ of any personal data that you provide to us.

Any queries relating to this notice and our privacy practices should be sent to our Data & Information Officer at [InfoRequests@Eildon.org.uk](mailto:InfoRequests@Eildon.org.uk).

### WHAT INFORMATION WE COLLECT

We collect information about you and other members of your household, when:

- You apply for housing with us (you will have been issued a separate privacy notice for this processing)
- You become a tenant
- You or a representative requests or receives services from us, including care and support services
- Entering into a factoring agreement with ourselves
- Applying to become a member
- Using our online services, whether to report any tenancy / factor related issues, make a complaint or a compliment or otherwise
- You make a payment to us
- You communicate with us (email, text, phone, contact us via social media etc.)
- You visit our developments we may obtain CCTV imagery
- You otherwise provide us with personal information through alternative means

**The information we collect and retain about you will depend upon the services you receive from us, this information may include:**

- Name
- Date of Birth
- Gender
- Address
- Telephone Number
- Email address
- Benefits Information
- Bank details
- Marital Status
- Preferred language
- Disability
- Medical
- Ethnic Origin
- Photographs
- Employer details
- ID Documentation
- National Insurance Number
- Household Composition
- Next of Kin
- Information about criminal convictions
- Rent Payment Method
- Information detailing your support needs
- Power of Attorney, Guardianship or other legal representative details
- Information detailing your support needs
- Details of your support provider if you have one
- Any further information that may be collected dependant on your circumstances

In some of our housing developments we provide a community wifi service, we will process the sign in details for these services.

**We may receive the following information from third parties in relation to your tenancy:**

- Benefits information, including awards of Housing Benefit / Universal Credit
- Payments made by you to us
- Complaints or other communications regarding behaviour or alleged breaches of the terms of your contract with us, including information obtained from Police Scotland;
- References from previous tenancies including reports as to the conduct or condition of your tenancy and complaints of anti-social behaviour
- Health and personal care information with regard to your housing and/or support needs

**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 (or with Scottish Borders Council where we are contracted to provide you with care and support services)
- Enable us to supply you with the services and information which you have requested
- Enable us to respond to your repair request, housing application and complaints made
- Analyse the information we collect so that we can administer, support, improve and develop our business and the services we offer
- Contact you to send you details of any changes to our suppliers which may affect you
- Ensure consistency with the proper performance of our operations and business
- Contact you to provide information and to collect your views on our products and services
- Protect your interests, and the interests of others
- Call recording information may be used for training and monitoring purposes

## SHARING OF YOUR INFORMATION:

**The information you provide to us will be treated by us confidentially. We may disclose your 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 merge with another business entity, your information may be disclosed to our new business partners or owners
- In the event that an aspect of our service is transferred to another organisation your information may be disclosed to the new provider
- If we instruct repair, maintenance or survey works your information may be disclosed to any contractor
- Your information will be processed to allow you to make payments by direct debits or by using a payment or debit / credit card
- If a rent refund is required we may request your bank details in order to make payment to you - on these occasions we will always confirm bank details with you
- If investigating a complaint or criminal activity, information may be disclosed to Police Scotland, Local Authority departments, Scottish Fire and Rescue Service and others involved in any complaint, whether we're investigating the complaint or otherwise
- In the interest of your safety we share information with emergency services and service providers
- If we are required to instruct Sheriff Officers directly your information will be disclosed as required
- Your information may be disclosed to third parties, such as utility companies and local authorities
- 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 results
- Obtaining legal guidance relating to your tenancy, your information may be shared
- If you are looking to move to another landlord, we may share reference information with your new landlord
- If you are in arrears, we may share information with a third party who analyses rent payment history to determine if contact is required, to aid our staff in collection of rent arrears
- If we have significant concerns about you or other household members welfare we may share information with Social Work
- We may share information with local authorities and health professionals with regard to your housing and / or care and support needs
- We share information with our warden call alarm provider to enable them to contact your family or medical professionals in the event of an emergency
- We grant access to our external auditors, internal auditors, the Scottish Housing Regulator, OSCR or anybody carrying out an audit on our services or systems

**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 OF THE UK AND EUROPE

Your information will only be stored within the UK.

We will not transfer your personal information out with the UK without making you aware.

## SECURITY

When you give us information, we take steps to make sure that your personal information is kept secure and safe. As we hold your information both in paper format and electronically, we have several different ways to ensure security measures are in place.

Personal information that we hold in paper format for you is kept in cabinets that are locked at the end of each working day.

The information that we hold about you electronically is protected in several ways:

- No access to the network unless the correct user-name and password are entered
- No access to Eildon's computers and smartphones unless the correct username and passwords are entered
- No access to the remotely hosted services unless the correct username and passwords are entered
- All Eildon computers and smartphones are password protected
- All Eildon electronic devices (tablets, notebooks, removable storage etc.) are encrypted
- Data Loss Prevention software
- A range of cyber security measures
- Anti-virus software
- Policies and procedures, information, and training for staff

Our Privacy Policy can be found in the downloads section of our website: [www.eildon.org.uk](http://www.eildon.org.uk), alternatively you can contact us and we will provide a hardcopy.

## HOW LONG WE 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, or as set out in any relevant contract we have with you.

We will generally keep your information for the periods indicated in our retention schedule which can be found online at: [www.eildon.org.uk](http://www.eildon.org.uk) alternatively you can contact us and we will provide a hardcopy.

After these time periods have passed the information will be destroyed if it is no longer required for the reasons it was obtained, or legally necessary.

## YOUR RIGHTS

You have the right at any time to:

- Ask for a copy of the information about you held by us in our records
- Ask us to correct any inaccuracies of fact in your information
- Request that we restrict your data processing
- Request data portability
- Rights related to automated decision-making including profiling
- Make a request to us to delete what personal data of yours we hold; and
- Object to receiving any marketing communications from us

**You should note that your rights under the UK GDPR and 2018 Act are not absolute and are subject to qualification.**

If you would like to find out more about how we use your personal data, would like to see a copy of the information that we hold about you, or wish to exercise any of the above rights, please contact our Data & Information Officer or email: [infoRequests@Eildon.org.uk](mailto:infoRequests@Eildon.org.uk).

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 contact details are noted below:

The Information Commissioner's Office – Scotland  
45 Melville Street  
Edinburgh  
EH3 7HL

**Telephone:** 0131 244 9001

**Email:** [Scotland@lco.org.uk](mailto:Scotland@lco.org.uk)

**The accuracy of your information is important to us - please help us keep our records updated by informing us of any changes to your personal information including your email address and other contact details.**

## How to Contact Us



The Weaving Shed, Ettrick Mill,  
Dunsdale Road, Selkirk TD7 5EB



[www.eildon.org.uk](http://www.eildon.org.uk)



Customer Service: 03000 200 217  
Main Switchboard: 01750 725900



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