

Eildon Housing Association Customer 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. 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.

1. Who are we?

Eildon Housing Association, (“we” or “us”), a Scottish Charity (Scottish Charity Number SCO15026), a registered society under the Co-operative and Community Benefit Societies Act 2014 with Registered Number 1757R(S) and having their Registered Office at The Weaving Shed, Ettrick Mill, Dunsdale Road, Selkirk TD7 5EB are committed to protecting the rights of individuals with respect to the processing of their personal data. We adhere to the Data Protection Act of 1998 and the General Data Protection Regulation (EU) 2016/679 (applicable from the 25 May 2018), as well as any domestic laws subsequently enacted. We collect and use personal data for a variety of reasons.

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.

Our Data & Information Officer is Kerry Allison. Any questions relating to this notice and our privacy practices should be sent to CorporateServicesTeam@Eildon.org.uk.

2. How we collect information from you and what information we collect

We collect information about you, when you:

- Apply for housing with us
- Become a tenant
- Request services, including care and support services
- Enter in to a factoring agreement with ourselves
- Apply to become a member
- Use our online services, whether to report any tenancy/factor related issues, make a compliment or a complaint, or otherwise
- Make payment to us (such as bank details, payment card numbers, employment details, benefit entitlement and any other income and expenditure related information)
- have telephone discussions with us (these will be recorded and retention details as below)
- Otherwise provide us with your personal details

The information we may collect about you include:

- Name
- Date of birth
- Gender
- Address
- Telephone number
- E-mail address
- National Insurance Number
- Next of kin
- Marital status
- Preferred language
- Disability
- Medical
- Ethnic Origin
- Nationality
- Employer details
- Information about criminal convictions and offences
- ID Documentation
- Benefits information
- Household composition
- Bank details

We receive the following information from third parties:

- 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

3. 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 a care service)
- 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 and 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 for your views on our products and services
- Protect your interests, and the interests of others

4. 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 or maintenance works, your information may be disclosed to any contractor
- Your information will be processed to allow you to make payments by direct debit or by using a payment or debit/credit card.
- 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
- 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
- If we are updating tenancy details, 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 end your tenancy and move to another landlord, we may share reference information with your new landlord
- 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

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.

5. Transfers outside the UK and Europe

Your information will only be stored within the UK and European Economic Area.

6. 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 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 username and password are entered
- All Eildon electronic devices (tablets, notebooks, phones etc.) are encrypted
- Data Loss Prevention software
- A range of cybersecurity 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, alternatively you can contact us and we will provide a hardcopy.

7. 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, 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 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.

8. 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
- Object to, or ask us to restrict, the processing of your personal data
- Require us to correct any inaccuracies in your information
- Make a request to us to delete what personal data of yours we hold

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 your above rights, please contact: **Data & Information Officer, Eildon Housing Association, The Weaving Shed, Ettrick Mill, Dunsdale Road, Selkirk, TD7 5EB** or email us on CorporateServicesTeam@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@ico.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.