

July 2021

# Privacy Notice

## Board Member



### 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.

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

At different stages of your Board application and if successful your term as a Board Member we may collect the following information:

#### Nomination Stage:

- Name
- Address
- Telephone Number
- Email address
- Qualifications
- Profile to accompany application .
- Previous employment details such as Job Titles
- Membership of EHA
- If you are a tenant or service user of EHA
- If you are related to a current Board member or employee of EHA
- If you are involved in a business that provides a service or is contracted to EHA
- Name of any other voluntary work you have been involved in

### **Membership Acceptance Stage:**

- Personal Characteristics such as gender, Age, Disability, religion, ethnic group, nationality, and religion
- Date of birth
- Marital status / Partners name
- Dietary requirements
- Contact Numbers
- CCTV footage
- Photographs
- Performance information
- Information obtained through electronic means such as ID swipe card records
- Information about your use of our information and communications systems
- Information about any disabilities
- Information about criminal convictions and offences
- Declaration of interest
- Code of conduct
- Bank details – for travel and out of pocket expenses

### **If you are appointed into an Office Bearers role we will also require:**

- Signatures submitted to the Association's bank for verifying authorisation for the positions of:
  - Chair of the Board
  - Vice-chair of the Board
  - Chair of Audit and Risk Committee
  - Chair of Eildon Enterprise Limited
- Care Inspectorate Disclosure for Chair of the Board

## **WHY WE NEED YOUR INFORMATION AND HOW IT WILL BE USED**

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

- Making a decision about your membership
- Paying travel expenses and out of pocket expenses
- Business management and planning, including accounting and auditing
- Conducting Board member reviews, and producing government action plans
- Gathering evidence for possible grievance if received
- Fraud prevention
- Monitoring your use of our information and communication systems to ensure compliance with IT policies
- Ensuring network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution
- Equal opportunities monitoring
- Dealing with complaints involving you

## SHARING OF YOUR INFORMATION

We may disclose 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:

- Processing your expenses payments
- Managing attendance and sickness absence
- To conduct data analytics's studies to review and better understand your engagement, retention, and attrition rates
- If we enter into a joint venture with, are sold to or merge with another business entity, your information may be disclosed to our new business partners or owners
- To obtain legal advice
- Scottish Housing Regulator (SHR)
- Scottish Federation of Housing (SFHA)
- Office of the Scottish Charity Regulator Office (OSCR)
- Scottish Borders Council (SBC)
- Financial Conduct Authority(FCA)
- Care Inspectorate (CI)
- Companies House
- Banks (for Office Bearers as above)
- Board Development Agency – Webinars / Training
- Auditors

## 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, removeable 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

## HOW LONG WE KEEP YOUR INFORMATION

We review our data retention periods regularly and will only hold personal data for as long as is necessary for the relevant activity, as long as required by law, or as set out in any relevant contract we have with you.

Data Retention guidelines on the information we hold is provided in our Document Retention Schedule held in the Policies library, which all staff have access to. Alternatively, a hard copy can be requested.

## 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 data is important to us – please help us to keep our records updated by informing HR of any changes to your personal circumstances such as change of address, telephone number, emergency contact details, bank details, criminal convictions, loss of driving licence or other relevant licence or work permit.**

## FREEDOM OF INFORMATION (SCOTLAND) ACT 2002 (FOISA)

Registered Social Landlords in Scotland have fallen under the remit for FOISA since November 2019, this means that we may occasionally receive information requested under the Act about our staff and we must consider whether to disclose staff information (including agency and temporary) in response to these requests.

We will consult with you prior to deciding whether to disclose any work-related information