



Eildon Customer Privacy Notice

December 2024

Purpose of this notice:

The privacy and security of your personal information is extremely important to us.

Your personal data includes all the information we hold that identifies you or is about you.

This privacy notice explains how and why we use your personal information, to make sure you stay informed and can be confident about giving us your information. We'll never sell your personal data and will only share it with organisations we work with when it's appropriate, so the privacy and security of your data is assured.

We will keep this privacy notice updated, and we'll let you know about any key changes that affect you.

Who we are:

The Eildon Group is based in the Scottish Borders and is made up of parent company Eildon Housing Association Ltd (registered with the Information Commissioner under registration number Z7231896) and Eildon Enterprise Ltd (registered number ZA594452). We provide housing (social and mid-market rent properties), care, and support services and via our people right across the Scottish Borders region.

We are the 'Data Controller' of any personal data that you provide to us. As controller of your personal data, we are responsible for looking after it, and processing it in a fair, lawful, and transparent manner.

Overview:

This notice applies if you're a tenant, customer, or use any of our services, visit our web site, email, call, make contact with us via social media, write to us or visit us in person.

The type of information we collect depends on your needs. For example.

- If you contact or visit us, we may only need limited information about you to

deal with your query.

- If you're one of our customers, we may need to collect a variety of information about you to ensure we can provide you with appropriate housing, comply with the terms of your contract or tenancy agreement with us, or to provide you with or refer you to appropriate support services to assist you.

Any queries relating to this notice and our privacy practices should be sent to our Data Protection and Information Officer at InfoRequests@Eildon.org.uk.

What information we hold about you

As a social housing landlord who provides care and support services, and through our care and repair team and adaptation and handyperson service, we collect information about:

- Our customers (including current, former and potential customers or customers who access our other services; this includes members of their family and people associated with them).
- Our stakeholders and business partners, such as contractors, suppliers, visitors and members of the public (including MPs and councillors).

The types of information we collect may include:

- Name and contact details (including email, telephone numbers and your current, previous and forwarding addresses).
- Your communication preferences
- Identification information (a copy of your driving licence/passport/identity card and your date of birth and gender).
- Family details (including, gender, next of kin and marital status).
- Financial information (including your income, welfare benefit entitlements and bank account details).
- Care and support needs, if you are applying for or are living in one of our supported living homes
- National identifiers (including National Insurance or social security number) and immigration status.
- Online identifiers (including IP address or cookies).
- Device identifiers (for example identifiers for a smartphone).
- Signature and /or photographic identification.
- Photographs, CCTV images, films and telephone recordings.
- Whistleblowing (confidential reporting) information.

We may also collect 'special categories' personal data such as:

- Ethnicity.
- Religious beliefs or other beliefs.
- Health conditions, disabilities or impairments relating to your accommodation or service requirements.
- Sexual life or orientation.
- Risks to children or other people.
- Criminal convictions or offences.

We minimise collection and use of sensitive information, however, given the services we provide, there are times when we use it to understand our customers and their

needs better, such as providing accommodation for customers with disabilities or when dealing with neighbourhood disputes involving alleged criminal activity.

Dependent upon your circumstances we may receive further information from third parties including:

- Information relating to benefits including the awarding of Housing Benefit or Universal Credit.
- Information relating to payments made by you to us.
- Complaints or other communications regarding your behavior or alleged breaches of the terms of your contract with us from other third-party sources including criminal convictions or offences information obtained from Police Scotland.
- Social Work, occupational therapists or GP's may provide us with information to enable us to provide you with appropriate adaptation or care and support services.

Please note this list is not exhaustive. Generally, the information we hold will have been provided by you (on application forms or enquiry forms when we communicate with you) apart from third party information detailed above.

How we collect information:

We collect personal information about you when:

- You apply to become a tenant.
- You sign up or end your tenancy.
- You apply for a transfer to move house.
- You contact us by phone, email, letter, or social media.
- You register to use our customer portal 'My Eildon.'
- You fill in forms provided by us.
- You sign up to our handyperson subscription service.
- You participate in customer surveys.
- You use our additional services i.e., Tenancy Sustainment, Care and Support, or attend customer engagement groups etc.

We also collect information through our on-going contact and correspondence with you, and with other support agencies which relate to you, and from people associated with you such as family members.

We record incoming and outgoing calls in our contact center.

We take photographs at our properties, events and in our communities to use for record keeping, marketing and publicity. Photographs of individuals will only be used for marketing and publicity with the individual's consent.

We may receive information about you from third parties including:

- Your council or benefit office relating to your housing.
- Prior landlords and credit agencies when you apply for housing.
- Police, Scottish Fire and Rescue Service, welfare or support organisations dealing with you.
- Councillors, MPs or other representatives acting on your behalf / instruction.

If you provide us with personal information relating to members of your family or your associates, we will assume that you do so with their knowledge and consent.

It is important that you notify us of any changes to your personal information as soon as possible so that the information we hold is accurate and current.

How we use your information

Your personal data will be collected and used to help us deliver activities or services or to complete a task at your request. What we do with your information will depend on the nature of our relationship with you and how you interact with our various services, website or customer portals.

The following sets out why we process your personal data and our lawful basis for processing your personal data. We may rely on more than one lawful basis for processing your personal data depending on the context of the processing activity.

Lawful basis for processing	Purpose/activity
Contract. <i>Manage any contract we have with you.</i>	<ul style="list-style-type: none">• Processing applications• Manage your tenancy including collecting rent and service charges.• Ensure compliance with the conditions of any agreement between us• Provide repairs, maintenance and adaptations at our properties.• Provide care and support.• Provide a handyperson service• Provide a meals service
Legitimate interests. <i>Provide you with services and benefits in both our legitimate interests.</i>	<ul style="list-style-type: none">• Monitor, analyse, deliver and improve our services to you• Ensure the proper management of your tenancy and give you appropriate support where needed.• Assist you in the management of account charges, payments and arrears including through our online portal.• Provide information about support or services to allow you to better manage your home.• Respond to your enquiries, keep in touch with you to understand your needs and preferences.• Promote our products and services and invite you to events
Comply with our legal and regulatory obligations, and acting in the public interest,	<ul style="list-style-type: none">• Prevent and detect crime and resolve disputes.• Prevent and detect fraud and money laundering.• Promote safety and the quiet enjoyment of our neighbourhoods and communities.

<i>such as:</i>	<ul style="list-style-type: none"> • Promote equal opportunities and fair treatment for all our customers. • Meet our obligations we owe to funders and regulators.
Consent	<ul style="list-style-type: none"> • We may sometimes process your information for specific purposes e.g. photographs for marketing and publicity, which requires your consent. If we do this, we will always ask for your written consent first. • Where we are processing your personal data based on your consent, you have the right to withdraw that consent at any time. This may affect the services that we can make available to you, this will be explained in the consent form.

How we share your information

Data sharing may be necessary with third parties so we can provide you with the best possible service. We may share information with contractors or agencies we work with such as local authorities, social services, other social landlords or associated third parties such as service providers, and where we are required under a legal obligation such as to assist with the detection of crime and/or we believe it is your or the public's interest to do so.

The list below sets out specific examples of where we may share your information, but this is not an exhaustive list.

In processing your personal data, we may:

- Share current or forwarding addresses with utility companies and council tax offices to ensure billing details are correct.
- Discuss your financial situation and share information about rent payments (including any arrears) and any claims made for welfare benefits with the local authority housing benefit department, the local authorities housing advice and homeless prevention team or the Department of Work and Pensions to make sure that benefits are paid correctly.
- Share information with Scottish Borders Council, the Care Inspectorate or Health and Social Care professionals with regard to the provision of care and support services.
- Share your information with our planned, cyclical and repairs and maintenance contractors and out of hours call centre service to ensure we can maintain your home.
- Share information about you with the Sheriff's court, our lawyers or authorised debt collection agencies to enable them to recover the debt if you default on any tenancy/license conditions.
- Share your information as part of a safeguarding report where we have concerns about your wellbeing, safety and/or security.
- Share your information in child protection and safeguarding issues.
- Where there is a health and safety risk or other risk to yourself and others.
- Pass your contact information to a third party to conduct surveys and research on our behalf which allow us to gather feedback and improve the services we offer you. The third party would be bound to strict terms and conditions outlined by us and would not share your data with other organisations.
- Share your National Insurance number to verify your Universal Credit application and manage these payments and to prevent and investigate

tenancy and right to buy application fraud.

When we share data, we do so within the guidelines identified with data protection law. When data is shared with third parties such as local authorities, data is encrypted, and password protected. When we use third party contractors to provide a service, we have contracts in place that dictate the terms under which information can be processed and how it must be kept secure.

We don't sell or provide your personal information to other organisations for their marketing purposes.

We will not share your personal information with anyone who claims to represent you unless we are satisfied that you have appointed them, or they act in some recognised official capacity.

How we store and protect your personal information

Information system and data security is imperative to us to ensure that we are keeping your data safe.

We operate a robust and thorough process for assessing, managing and protecting new and existing systems which ensures that they are up to date and secure against the ever-changing threat landscape. In addition to this, we follow a defence in-depth security model, which means that your data is protected by multiple layers of security.

Personal information is stored and managed within a variety of IT software systems which are maintained to achieve a high level of security and confidentiality. We hold information in IT systems which may be copied for testing, backup, archiving and disaster recovery purposes.

Our employees complete mandatory information security and data protection training at the start of their employment, and annually thereafter to reinforce responsibilities and requirements set out in our information security policies. Only those staff members and third parties who require access to your information will be able to access it.

When you trust us with your data, we will always keep your information secure to maintain your confidentiality. By utilising strong encryption when your information is stored or in transit, we minimise the risk of unauthorised access or disclosure; when entering information on our website, you can check this is secure by right clicking on the padlock icon in the address bar.

We store most of our data in the UK. Some organisations which provide services to us may transfer data inside the European Economic Area, but we'll only allow this if your data is adequately protected.

How long we hold your information

We will only use and store your information for as long as it is required for the purposes it was collected for. How long information will be stored for depends on what it is being used for. Sometimes we may also need to keep information for statutory or regulatory purposes or to deal with any legal claims.

We will usually keep:

- Any application for accommodation for 2 years following acceptance of the offer of accommodation;
- Universal credit, housing benefit and supporting people information, notifications and rent statements for 2 years;
- Information on your tenancy file for 5 years following the end of your tenancy with us;
- Support plans and related documents until reviewed and updated,
- CCTV footage and recordings of telephone calls for 30 days
- Customer satisfaction survey data for 5 years

After these time periods have passed the information will be destroyed if no longer required for the reasons it was obtained, or it is legally necessary. Paper files will be destroyed by a contracted secure shredding company and electronic files will be permanently deleted.

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 Protection and Information Officer or email: 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

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, you can also update your personal data through our 'My Eildon' portal.