

Abertay Housing Association Privacy Policy

1. Background to Privacy Policy

This Privacy Policy (the “**Policy**”) applies between you, the user of this website (the “**Site**”), and Abertay Housing Association, the owner of this Site. This Policy applies to our use of any and all data collected by us in relation to your use of the Site and any services or systems therein. This Policy forms part of and is incorporated into our Terms and Conditions for using our Site.

This Site is operated by Abertay Housing Association. We are committed to protecting and respecting your privacy and complying with the Data Protection Act 1998 (the “1998 Act”). Abertay Housing Association is a Data Controller in terms of the 1998 Act. We are registered as a Data Controller, under Registration Number Z6561672, with the Information Commissioner’s Office. This statement sets out our Policy and explains what we do with the personal information that we collect from our users. By using this Site, you agree to the data practices described in this Policy. Please read the following to understand our views and practices regarding personal information. If you have any questions or concerns regarding this Policy, you should contact us using the details given at the end of this Policy.

Please note that this Policy applies only to the Site and not to the sites of other organisations to which we may provide links. We are not responsible for the privacy policies or practices of such third party sites and you should make your own enquiries in respect of them.

2. Data Collected

We may request information from you only for a narrow set of purposes. We may collect identifying information for the following purposes:

- (a) For registration to certain areas of the Site;
- (b) To allow us to consider your comments, queries and suggestions and respond if necessary;
- (c) To allow us to respond to your enquiries for further information;
- (d) To distribute requested materials;
- (e) To enable online payments to be made; and
- (f) To enable you to report repairs using our online reporting system.

The type of personal information collected on the Site could include your name, company name, address (including postcode), email address, telephone number (including mobile), user name and password. We may also receive information from other users if they provide information relating to you. If you provide us with information about other people, you confirm that you have obtained express permission from them prior to its provision to us.

We may collect details of your visits to our Site, including traffic data, location data, web logs, and other communication data, and what resources you use on our Site when you visit. We receive this information through cookies (see below). We may also collect information about your computer, including (where available) your IP address, browser type and operating system, for system administration and to report aggregate information. This is statistical data about your browsing actions and patterns, and does not identify you as an individual.

3. Our Use of Data

Any personal data you submit will be retained by Abertay Housing Association for as long as you use the services and systems provided on the Site. Data that you may submit through any communications system that we provide may be retained for a longer period.

All personal data is stored securely in accordance with the principles of the 1998 Act. For more details on security, see section 7 below.

Any or all of the above data may be required by us from time to time in order to provide you with the best possible service and experience when using our Site. Specifically, we may use data for the following reasons:

- (a) Ensuring our Site is properly maintained and operated (including your account);
- (b) Ensuring our Site content is presented to you in an effective manner, and personalising your user experience;
- (c) Internal record keeping;
- (d) Improvement of our products/services;
- (e) Transmission by email of materials that may be of interest to you;
- (f) Contact for market research purposes that may be done using email, telephone, fax or mail. Such information may be used to customise or update the Site; and
- (g) Complying with legal obligations.

We may share your personal information with third parties but only in the strictly limited circumstances set out below:

- (a) We may supply your personal information to third parties (such as our internet service providers) who help us administer this Site. These third parties must at all times provide the same levels of security for your personal information as Abertay Housing Association and, where required, are bound by a legal agreement to keep your personal information private, secure and to process it only on the specific instructions of Abertay Housing Association;
- (b) We may also supply your personal information to government bodies and law enforcement agencies if: we are required to do so by the requirements of any applicable law; if in our good faith judgment, such action is reasonably necessary to comply with legal process; to respond to any legal claims or actions; or to protect the rights of Abertay Housing Association, its tenants and the public;

- (c) Abertay Housing Association may, from time to time, employ the services of other parties for dealing with matters that may include, but are not limited to, delivery of purchased items, search engine facilities, advertising and marketing. The providers of such services do not have access to certain personal data provided by users of this Site. Any use for other purposes is strictly prohibited.

4. Controlling Access to Your Data

Wherever you are required to submit data, you will be given options to restrict our use of that data. This may include the following:

- (a) Use of data for direct marketing purposes; and
- (b) Sharing data with third parties.

If at any time our Site contains subscription mailing lists there will always be the option to remove you from the aforementioned list. Normally this, "unsubscribe" option will appear at the bottom of the most recently sent email newsletter.

If the information we hold about you is no longer correct, please let us know and we will update our records.

4 Your Right to Withhold Information

You may access certain areas of the Site without providing any data at all. However, to use all services and systems available on the Site you may be required to submit account information or other data.

You may restrict your internet browser's use of cookies. For more information see section 9 below.

5 Accessing Your Own Data

You have certain rights as a Data Subject under the 1998 Act to request details and in certain circumstances a copy of the personal data which we hold about you. The law states that we may charge you a £10 fee for providing this information. If you would like a copy, please write to us at the address below and mark your envelope "Personal information request". Should you discover any inaccuracies in such personal data, please notify us as soon as possible at the same address. We will then correct our records, and notify any third parties to whom such personal data may have been supplied.

6 Security

Data security is of great importance to Abertay Housing Association and to protect your data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure data collected online.

The Internet is inherently insecure. Personal data submitted by means of the Internet may be vulnerable to unauthorised access by third parties. Submission of personal data using the Internet is at your own risk. We will take reasonable and appropriate technical measures to ensure that your personal data is stored in a secure manner. However we shall have no liability for disclosure of data due to errors in transmission or the fraudulent, negligent or other illegal acts of a third party, such as 'hacking'. Any transmission of personal information on or through the use of our web site is at your own risk.

Where we provide you with the ability to register with our Site, you must not divulge any account username or password to anyone. Please always remember to log out of your account and close your browser window when you have finished using them. This ensures that others cannot access your personal data especially when using a shared or public access computer terminal.

7 Transmission of Data Overseas

All information you provide to us is stored on secure servers based in the UK. Abertay Housing Association will not transfer your personal data to a country outside the European Economic Area without your prior consent and without first having assessed the adequacy of protection for individual rights in respect of personal data available in that country.

8 Site Statistics

We do gather non-personal data regarding visitors to our Site. This is provided to use statistical information on visits to pages, number of online users, type of browsers being used to view the Site, paths taken through the Site and other general information. Under no circumstances can this be linked to a particular person.

9 Cookies

Abertay Housing Association may set and access cookies on your computer. A cookie is a small file that resides on your computer's hard drive and often contains an anonymous unique identifier and is accessible only by the site that placed it there, not any other sites. In general we use:

- a. Temporary 'session' cookies to help you navigate through our Site and to enhance your user experience. These cookies are temporary and disappear when you close your browser.
- b. Permanent 'persistent' cookies (where we provide you with a log-in facility) to help us recognise you as a unique visitor when you log in to our Site, and to personalise your account. If you choose the 'Remember me' option, we use a persistent cookie to save you having to remember your log-in details. You can turn off this option by logging out and unticking the 'stay signed in' box. We use persistent cookies to track where our Site visitors came from, what search engine they used, what link they clicked on, and their location when they accessed our Site; and
- c. Google Analytics cookies to identify unique visitors, define user sessions, and track traffic sources and navigation. Information collected in this way does not personally identify you. You can find out more about these cookies here.

You may delete cookies. However, if you delete them, you may lose any information that enables you to access the Site more quickly. You can also choose to enable or disable cookies in your web browser.

By default, your browser will accept cookies: this can be altered. For further details please consult the help menu in your browser. Disabling cookies may prevent you from using the full range of services available on the Site.

10 Changes to this Policy

Abertay Housing Association reserves the right to change this Policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Site and you are deemed to have accepted the terms of the Policy on your first use of the Site following the alterations.

11 Contact Details

Email: queries@abertayha.co.uk or

Post: Abertay Housing Association, 147 Fintry Drive, Dundee, DD5 9HE; or

Phone: 01382 903545.