

## **Abertay Housing Association GDPR Fair Processing Notice (How we use your personal information)**

Abertay Housing Association Limited, a Scottish Charity (Scottish Charity Number SC030152), a registered society under the Co-operative and Community Benefit Societies Act 2014 with Registered Number 2517R(S) and having its Registered Office at 147 Fintry Drive, Dundee, DD4 9HE is committed to protecting the privacy and security of your personal information (“**we/us**”).

This notice explains what information we collect about you, when we collect it and how we use this in accordance with the Data Protection Act 1998 and the General Data Protection Regulation (EU) 2016/679 (applicable from the 25th May 2018), together with any domestic laws subsequently enacted (“**Data Protection Legislation**”). 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.

It is important that you read and retain this notice, together with any other notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information and what your rights are under the Data Protection Legislation.

### **Who are we?**

We are a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. We are required under the Data Protection Legislation to notify you of the information contained in this notice.

We take the issue of security and data protection very seriously and strictly adhere to the Data Protection Legislation. We have a Data Protection Officer who can be contacted at [queries@abertayha.co.uk](mailto:queries@abertayha.co.uk) or 01382 903545 or 147 Fintry Drive, Dundee, DD4 9HE. Any questions relating to this notice and our privacy practices should be sent to [queries@abertayha.co.uk](mailto:queries@abertayha.co.uk) or 01382 903545 or 147 Fintry Drive, Dundee, DD4 9HE.

### **How do we collect information from you?**

We collect information about you:

- when you apply for housing with us, become a tenant, request services / repairs, enter into a factoring agreement with ourselves howsoever arising or otherwise provide us with your personal details
- when you apply to become a member;
- when you contact us, by whatever means, whether to report any tenancy / factor related issues, make a complaint or otherwise;
- when we contact you, by whatever means, whether to investigate any tenancy / factor related issues, make a complaint or otherwise;
- from your arrangements to make payment to us (such as bank details, payment card numbers, employment details, benefit entitlement and any other income and expenditure related information); and
- from your responses to satisfaction surveys.

### **What information do we collect?**

We collect the following information about you:

- Name;
- Address;
- Telephone number;
- E-mail address;
- Date of Birth;
- Gender;
- Ethnicity;
- Disability information;
- National Insurance Number;
- Next of Kin;
- Bank details;
- Employment details;
- Dependents details, including name, address, date of birth, National Insurance number, gender, disabilities, economic status, relationship to tenant, telephone number, e-mail address;
- Photographs and associated Permission forms;
- CCTV images;
- Sound recording data;
- Account information;
- Information provided or collected in investigating a complaint;
- Information provided or collected in investigating an anti social behaviour issue;
- Information provided or collected to assist with tenancy sustainment; and
- Information provided or collected to inform our decision as to whether a two person visit is required.

### **What information do we receive from third parties?**

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 other alleged breaches of the terms of your contract with us, including information obtained from Police Scotland;
- Reports as to the conduct or condition of your tenancy, including references from previous tenancies, and complaints of anti-social behaviour;
- Application information through the Common Housing Register;
- Updated information received by our contractors; and
- Information in relation to health and wellbeing following responses to alarm call outs from our alarm contractors, Scottish Fire and Rescue Service and the relevant Local Authority.

### **How will we use your information?**

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;
- to enable us to supply you with the services and information which you have requested;
- to enable us to respond to your repair request, housing application and complaints made;
- to analyse the information we collect so that we can administer, support and improve and develop our business and the services we offer;
- to contact you in order to send you details of any changes to our services or supplies which may affect you;
- for all other purposes consistent with the proper performance of our operations and business; and
- to contact you for your views on our products and services.

### **Who do we disclose your information to?**

The information you provide to us will be treated by us as confidential and will be processed only by our employees within the UK / EEA. 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;
- If we instruct repair or maintenance works, your information may be disclosed to any contractor;
- 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;
- If we are updating tenancy details, your information may be disclosed to third parties (such as utility companies and the Local Authority);
- If we are investigating payments made or otherwise, your information may be disclosed to payment processors, the Local Authority and the Department of Work & Pensions;
- To assist in the recovery of debts outstanding;
- 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 survey results; and
- Information in relation to health and wellbeing may be disclosed to assist responses to alarm call outs with our alarm contractors, Scottish Fire and Rescue Service and the relevant Local Authority.

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.

### **Where will we store your information?**

Your information will only be stored within the UK and EEA.

## **Security**

When you give us information we take steps to make sure that your personal information is kept secure and safe in accordance with our Privacy and Data Protection Policy.

## **How long will 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 (we may be legally required to hold some types of information), or as set out in any relevant contract we have with you.

Data retention guidelines on the information we hold are available. We will generally keep your information for the minimum periods set out in the guidelines after which this will be destroyed if it is no longer required for the reasons it was obtained.

## **What are 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;
- require us to correct any inaccuracies in your information;
- make a request to us to delete what personal data of yours we hold;
- object to the processing of your information or to receiving any marketing communications from us;
- ask us to suspend the processing of your information; and
- request the transfer of your information to another party.

If you would like to exercise any of your rights above please contact us at [queries@abertayha.co.uk](mailto:queries@abertayha.co.uk) We will respond without delay and within one month of your request in writing.

You will not have to pay a fee to access your information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for information is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

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  
Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF  
Telephone: 0303 123 1113  
Website: <https://ico.org.uk/make-a-complaint/>

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