

# **Parkhead Housing Association GDPR Fair Processing Notice**

## **(How we use your personal information)**

This notice explains what information we collect, when we collect it and how we use this. During the course of our activities we will process personal data (which may be held on paper, electronically, or otherwise) about you and your household members, 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.

### **Who are we?**

Parkhead Housing Association a Scottish Charity (Scottish Charity Number SCO 30908), a registered society under the Co-operative and Community Benefit Societies Act 2014, registered with the Scottish Housing Regulator No. HCB 167 having their Registered Office at 40 Helenvale Street, Parkhead, Glasgow, G31 4TF take the issue of security and data protection very seriously and strictly adhere to guidelines published in the [Data Protection Act of 1998] and the General Data Protection Regulation (EU) 2016/679 which is applicable from the 25th May 2018, together with any domestic laws subsequently enacted.

We are the data controller of any personal data that you provide to us.

### **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, use our services, request services/ repairs, enter in to a factoring agreement with ourselves howsoever arising or otherwise provide us with your personal details
- when you apply to become a member;
- from your use of our online services, including social media, whether to report 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);

We collect the following information about you and/or your household members:

- name;
- address;
- date of birth;
- telephone number;
- e-mail address;
- previous addresses;
- ethnicity;
- medical/disability info;
- national insurance number;
- next of kin;
- current & former tenant arrears owed;
- rechargeable repairs owed;
- legal action commenced on tenancy;
- sex offenders register;
- proof of address;
- proof of identification;
- proof of income;
- bank details

We receive the following information from third parties:

- Benefits information provided by DWP, HMRC, The Scottish Social Security Agency and Local Authority, 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 & Community Safety Glasgow;
- Reports as to the conduct or condition of your tenancy, including references from previous tenancies, and complaints of anti-social behaviour;
- Medical information concerning you, or a household member, from NHS practitioners, Local Authority.

## **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;
- 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 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;
- To enable our Welfare Rights Officer or Financial Inclusion Officer to provide accurate advice and information and assist you in connection with your welfare matters.

## **Sharing of Your Information**

The information you provide to us will be treated by us as confidential and will be processed only by our employees within the UK. 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 merged 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 Local Authority);
- If we are investigating payments made or otherwise, your information may be disclosed to payment processors, Local Authority, Department of Work & Pensions; Allpay, Impact (3<sup>rd</sup> party call centre);
- 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;
- If you undertake a Housing Options interview your information may be disclosed to other agencies involved in Housing Options;
- If we have concerns about your ability to manage your tenancy we may share information with the Local Authority Social Work Department and Homeless casework team;
- If you access our Welfare Rights or Financial Inclusion services, your information may be disclosed, with your consent, to contact Statutory, voluntary or third sector organisations in connection with your welfare.

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.

## **Transfers outside the UK and Europe**

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.

(More information on this can be found within Parkhead Housing Association's Document Management and Retention Policy and Procedures & Parkhead Housing Association's Privacy Policy, both available on request.)

## **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 (we may be legally required to hold some types of information), or as set out in any relevant contract we have with you, or for an agreed period to protect your vital interests or those of another person in connection with your welfare.

We will generally keep your information for the following minimum periods: (on next page)

Type of record	Suggested retention time
Membership records	5 years after last contact
Application forms, interview notes	Minimum 6 months to a year from date of interviews. Successful applicants documents should be transferred to personal file.
Applicants for accommodation	5 years
Housing Benefits Notifications	Duration of Tenancy/ 6 years following end of HBOP recovery dispute
Tenancy files	Duration of Tenancy
Former tenants' files (key info)	5 years
Third Party documents	Duration of Tenancy
Records re offenders. Ex-offenders (sex offender register)	Duration of Tenancy
Lease documents	5 years after lease termination
ASB case files	5 years/end of legal action
Board meetings/residents' meetings	1 year
Minute of factoring meetings	Duration of appointment
Welfare Rights Case Files	5 Years after case closed
Welfare Rights Documentation	5 years or set period on express consent from customer to protect their welfare interests
Welfare Rights – Cash for Kids Documentation	2 years following award

After which this will be destroyed if it is no longer required for the reasons it was obtained. Unless express permission from customer is given to retain information to protect their welfare interests.

Our full retention schedule is available within Parkhead Housing Associations "Document Management and Retention Policy and Procedures" available within our offices at 40 Helenvale Street, Parkhead, Glasgow G31 4TF.

## **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 your we hold; and
- object to receiving any marketing communications from us.

If you would like to exercise any of your rights above please contact us at [dataprotection@parkheadha.org.uk](mailto:dataprotection@parkheadha.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](mailto: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 email address and other contact details.

