

# Southside

## FACTORING & RELATED SERVICES

### **SOUTHSIDE FACTORING AND RESIDENTIAL SERVICES**

#### **GDPR Fair Processing Notice**

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 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.

Southside Housing Association (Reg.No. HCB186) is a Scottish Charity (Scottish Charity Number SCO36009), a registered society under the Co-operative and Community Benefit Societies Act 2014 with Registered Number 1694r(s) and having its Registered Office at 135 Fifty Pitches Road, Glasgow G51 4EB. Southside Factoring and Related Services is the legal subsidiary of SHA (Property Factor Registration No: PF0000323) that delivers a range of commercial activities which include Factoring, Mid-Market Rent and Private Letting.

Southside Factoring and Related Services, takes the issue of security and data protection very seriously and strictly adheres 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 notified as a Data Controller with the Office of the Information Commissioner under registration number Z1264554 and we are the data controller of any personal data that you provide to us.

Our Data Protection Officer is Desmond Phee (Corporate Compliance Officer).

Any questions relating to this notice and our privacy practices should be sent to the Data Protection Officer.

## **How we collect information from you and what information we collect**

- when you enter in to a factoring agreement with ourselves or otherwise provide us with your personal details
- from your use of our online services, whether to report any 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);

We may collect and process the following personal information about you:

- Your name
- Your correspondence address
- Your contact details: home telephone number, mobile phone number and email address;
- National Insurance Number;
- Payment details: your bank account details, any third party payment details.
- Details of common area repairs requests that you have made including time and dates for access and when repairs have been completed.
- Images: this may include photographs from events or images captured by CCTV
- Your IP address: when you access our website.

We may also record other information when you contact us or use any of the services that we provide. We may also record information about action we take e.g. in relation to anti-social behaviour so that we have an accurate record of what has happened.

Southside Factoring and Related Services will not collect any personal data for you that we do not need.

We also may receive the following information from third parties:

- Payments made by you to us from third party payment sources.
- Information from sheriff officers in the event of arrears collections
- Complaints information or other communications from a third party representative acting on your behalf

## **Why we need this information about you and how it will be used**

We need to collect your personal data in order to allow us to effectively provide the housing or other services which you have requested from us.

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.
- Respond effectively to our customers enquiries and complaints.
- Contact you to update you on any changes to our services which may affect you
- Deliver a high quality and value for money factoring service for homeowners.
- Manage payments from you and allow us to effectively manage your accounts.
- Assist in the recovery of debts or if necessary court or other legal actions
- Meet our legislative and regulatory obligations including providing our annual returns and other information to regulatory bodies.
- Contact you for your views on our products and services including satisfaction surveys and consultations.

We also need and use your information for all other purposes consistent with the proper performance of our operations and business.

The legal basis for processing your personal data is

- To fulfil our contract to provide a property factor service with you as a client;
- To meet our and our customers legitimate interests in the proper administration of our property factoring relationship, and;
- To fulfil legal obligations with which we need to comply such as The Property Factors (Scotland) Act 2011 and Money Laundering Regulations.

## **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/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 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;
- Our Customer Management System providers, OmniLedger Ltd.
- Survey contractors, solicitors and sheriff officers.
- The First Tier Tribunal (Housing and Property Chamber) for the purposes of independent review of a complaint you may have made.
- If we are investigating a complaint, information may be disclosed to Police Scotland, Glasgow City Council, Scottish Fire & Rescue Service and others involved in any complaint, whether investigating the complaint or otherwise;
- If we are investigating payments made or otherwise, your information may be disclosed to payment processors.
- 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

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:

Where information is transferred outside the UK or EEA we will ensure that there are adequate safeguards in place to protect your information in accordance with this notice.

### **Security**

When you give us information we take steps to make sure that your personal information is kept secure and safe.

Only Southside Factoring and Related Services staff and partners and contractors who have signed data sharing agreements and who need to see your personal information will have access to it.

We will not usually retain your payment details unless you make payments to us using Direct Debit.

Our computer systems are located in our main office, however our staff may occasionally use laptops, tablet or other devices offsite. In instances where devices are used remotely this will be secure and under strict control at all times in line with section 6 of our IT Policy which is available on request. Additionally we have the following controls in place to ensure the security of your personal information

- All paper based records are securely locked in storage cupboards when not actively being used.
- Our offices are protected by an alarm system, a security company and are monitored by CCTV.
- All Southside Factoring and Related Services computer servers are within a secure network.
- All electronic communication takes place within this secure environment.

The unauthorised use of IT systems is prevented by:

- User ID
- Password assignment
- Lock screen with password activation
- Each authorised user has a private password known only to themselves.
- Regular prompts for password amendments

The following additional measures are taken to ensure the security of any Data:

- Network username
- Network password
- Application username

- Application password
- Application permissions and access restricted to those who require it.

### **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.

We will generally keep your information for the periods set out in our Data Retention Periods Guidelines, after which this will be destroyed if it is no longer required for the reasons it was obtained.

Our full retention schedule is available on request or can be viewed on our website.

### **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 [factoring@southside-ha.co.uk](mailto:factoring@southside-ha.co.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.



