

# FAIR PROCESSING NOTICE

#### HOUSING APPLICANTS

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





#### WHO ARE WE?

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 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 Z6936072 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 Date Protection Officer.

#### **HOW WE USE YOUR INFORMATION**

We need to know your personal data In order to provide the Housing Services that you have requested us to provide to you. We also need your data to ensure that we are communicating effectively with all of our customer s as is required by the Scottish Housing Regulator

We may collect the following personal information about you:

- Your personal details: name, address, date of birth.
- Your contact details: home telephone number, mobile phone number and email address:
- Your National Insurance Number
- Other details: including information about your gender, ethnicity, disability and marital status.
- Any Medical information which may be necessary to adequately process your application for housing.

- National Insurance Number;
- Information about the composition of your Household including details of existing accommodation arrangements and individual(s) who may seeking accommodation with an applicant.
- Details of any of your previous addresses in past five years.

We will not collect any personal data for you that we do not need.

We also may receive the following information from third parties:

- Benefits information, including awards of Housing Benefit / Universal Credit
- Reports as to the conduct or condition of your tenancy, including references from previous tenancies, and complaints of anti-social behaviour.

### 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.
- Process applications for housing.
- Sign up new tenants.
- Respond effectively to our customers enquiries.
- 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 bases for processing your data are:

- To meet our legitimate interests in processing your application for housing
- To enter into a contract with you if your application is successful
- Your consent in processing special category data

#### 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 will only share the personal data that you provide in your application for housing (your name, address and tenancy dates) with your current or previous landlords for the purposes of making a reference request for them to provide us with the information we need.

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.

#### **CONTRACTORS AND SUPPLIERS**

We may also share your personal information with our suppliers or contractors who provide a service to you, or who provide services on our behalf. The data that we share will only be the specific information that the supplier or contractor requires in order to deliver that service, as well as any information that ensure we fulfil our health and safety obligations to the people carrying out the task. We may share this information with the following type of organisations.

- Printing and mail distribution
- Customer survey/research companies
- Document storage

#### THIRD PARTY REPRESENTATION

If you wish for another person to deal with your affairs or act on your behalf you can access a Personal Representative Mandate Form on our website or on request from our offices. When you complete this form it allows you to nominate a named person and give them permission to discuss specific personal information with us or to act on your behalf in relation to all of your personal information in dealing with us.

We will not share your personal information with anyone unless we are assured that you have given them permission to act on your behalf or that they act in a recognised official capacity. This may mean that there may be a delay in us dealing with your request while we confirm a person's identity or confirm that we have your permission to deal with them.

#### **UNACCEPTABLE BEHAVIOUR**

In the very exceptional occasions when an applicant for housing is violent, aggressive or abusive to Southside Housing Association staff, customers or other residents, the Association may take action to place an alert on your file in order to protect our staff, customers and those who deliver services on our behalf.

If we do this we will write and inform you why action has been taken and of your right to appeal the decision in line with the Association's Unacceptable Actions Policy. We will share information with our contractors and other partners who provide services too in order to protect them also.

#### **SECURITY**

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

Only SHA 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 SHA's 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 SHA 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 enquiries@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

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.

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