



Cathcart & District Housing Association

TENANT PRIVACY 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 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?

Cathcart & District Housing Association, registered as:

A Scottish Charity (Scottish Charity Number SC037255);
A registered society under the Co-operative and Community Benefit Societies Act 2014 and the;
Financial Services Agency with Registered Number 1821 RS;
A registered Property Factor, Registered Number 000230;

and having their Registered Office at:

3-5 Rhannan Road, Cathcart, Glasgow, G44 3AZ

Cathcart & District Housing Association takes the issue of security and Data Protection very seriously and strictly adheres to guidelines published in the General Data Protection Regulation applicable from the 25 May 2018 and the Data Protection Act 2018.

We are notified as a Data Controller with the Office of the Information Commissioner (ICO) under registration number ZA165233 and 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, 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;
- from your use of our online services, 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 may collect the following information about you:

- Personal details: name, addresses, date of birth
- Contact details: home phone number, mobile phone number and email address
- Further details: NI number, gender, ethnicity, disability, medical details, marital status, signature, unacceptable behaviour warnings
- Household composition: details of existing accommodation arrangements and family
- Members seeking accommodation with the applicant
- Tenancy Details: start and end dates, rent paid, under/over payments
- Payment details: bank account details, 3rd party payment details

- Repairs: repairs requested, access details, completion dates
- Pseudonymised data: CDHA customer account numbers, rent/factors reference number,
- share membership number
- Purchase details: solicitors details
- Employment: benefit/council tax status and payments, employment history, education
- history, tax code, trade union membership
- Employment application details, asylum status, criminal record declaration
- Location: IP address when you access our website
- Images: event photographs and CCTV images
- Voice recording on our voicemail and office telephones

We may also record factual information whenever you contact us or use our services, as well as information about other action we take, so that we have an accurate record of what happened.

We may 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, Social Services and/or Local Authorities;
- 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;
- Enable us to supply you with the services and information that you have requested;
- Enable us to respond to your repair request, housing application and complaints made;
- Analyse the information we collect so that we can administer, support, improve and develop our business and the services we offer;
- Contact you in order to send you details of any changes to our or suppliers that may affect you;
- Progress all other purposes consistent with the proper performance of our operations and business; and
- Contact you for your views on our products and services.

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 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, Glasgow City Council and/or Council 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 Glasgow City Council and/or Council departments).
- If we are investigating payments made or otherwise, your information may be disclosed to payment processors, Glasgow City Council and/or Council Departments and the Department of Work & Pensions;
- We may share details with our Data Protection Team and/or Legal Advisors
- 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 are using an advice or advocacy service (such as a solicitor, advice agency or the welfare benefits advisor based in Cathcart & District Housing Association's Office) we will share relevant information with them where it is necessary to progress your case.
- If you request that we share your information with other RSLs under Housing Options who may assist in re-housing you.
- If your household is threatened with homelessness, your information may be shared between us and Glasgow City Health and Social Care Partnership.
- If we are pursuing debts associated with a tenancy or a former tenancy we may share your basic information with a third party agency to assist in the recovery of those debts;
- If we are making an insurance claim following an incident we may share your information with our insurers.
- If we are being audited then we may share your information with our auditors.
- Where there is a legal action that involves you such as action to recover a tenancy your information may be shared with a solicitor to assist in the legal process.
- To fulfil our legal and regulatory obligations to bodies such as the Scottish Housing Regulator, Financial Conduct Authority or the Office of the Scottish Charity Regulator.

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. All information is kept in line with our Privacy Policy which is available on our website or from reception.

Only CDHA 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, i.e. for homeworking. In instances where devices are used remotely this will be secure and under strict control at all times.

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 CDHA 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

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 periods as recommended by law. Once the periods have expired, the information will be destroyed if it is no longer required for the reasons it was obtained. Our full retention schedule is available by contacting the office on 0141 633 2779, emailing us at info@cathcartha.co.uk or from our website: <https://www.cathcartha.co.uk/content/get-touch>.

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;
- in certain situations, make a request to us to delete your personal data;
- request we restrict processing your personal data;
- object to receiving any marketing communications from us, and;
- to be informed of any automated decisions made in relation to you.

Our Data Protection Officer is provided by RGDP LLP and can be contacted either via 07951 241584 or info@rgdp.co.uk.

Any questions relating to this notice and our privacy practices should be directed, in the first instance, to info@cathcartha.co.uk or by telephoning 0141 633 2779.

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.