

West Whitlawburn Housing Co-operative Limited

Belmont House, 57 Belmont Road, Cambuslang, G72 8PG
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www.wwhc.org.uk



Agenda item 13 b)

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 it. 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?

West Whitlawburn Housing Co-operative (WWHC), a Scottish Charity (Scottish Charity Number SCO38737), a registered society under the Co-operative and Community Benefit Societies Act 2014 and having their Registered Office at 57 Belmont Road, Whitlawburn, Cambuslang, G72 8PG (“we” or “us”) 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 notified as a Data Controller with the Office of the Information Commissioner under registration number **Z5990754** and we are the data controller of any personal data that you provide to us.

Any questions relating to this notice and our privacy practices should be sent to WWHC’s Data Protection Officer, Stephanie Marshall, Depute Director, at the Co-operative’s office.

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, howsoever arising or otherwise provide us with your personal details
- when you apply to become a member
- tenancy sign up documents
- tenancy related correspondence
- from your use of our online services or social media, whether to report any tenancy 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); any financial transactions
- From the images captured by our CCTV cameras
- Any other instance where you provide us with your personal information

We collect the following information about you and your household:

- name
- address
- date of birth
- gender
- telephone number
- e-mail address
- National insurance number
- next of kin and emergency contact information
- ethnicity
- medical/health information
- Proof of identity such as passport and driving licence details
- Employment details
- Bank details
- Benefit details
- CCTV images

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
- Information supplied by the relevant local authority departments

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 services or supplies which may affect you
- for all other purposes consistent with the proper performance of our operations and business
- to contact you for your views on our products and services
- to ensure that we are protecting your interests, and the interests of others;
- to comply with our legal and regulatory obligations and duties

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
- 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);
- Your information may be shared with our solicitors and auditors
- If we are investigating payments made or otherwise, your information may be disclosed to payment processors, Local Authority and the Department of Work & Pensions
- Your data may be shared with the Department of Work and Pensions, Local Authorities or any other relevant department to facilitate the payment of any benefits
- 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 requested by an emergency service

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 (European Economic Area).

Security

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

All data is held in line with WWHC's Privacy Policy, a copy of which is available on request.

Our systems are password protected and all electronic data is stored securely.

All paper files are kept in the appropriate office filing cabinets with appropriate staff access.

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.

It is then destroyed if it is no longer required for the reasons it was obtained.

Our full retention schedule is available on request from the office.

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; and
- object to receiving any marketing communications from us.

If you would like to exercise any of your rights above please contact WWHC's Depute Director in writing, or call the office on 0141 641 8628 or email enquiries@wwhc.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

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