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

In the event that personal data is transferred outwith the UK, we will ensure that an appropriate contract or other safeguard is in place with any third party to whom data is transferred or that an appropriate legal exemption applies.

## **Security**

We take steps to make sure that personal information is kept secure and safe. All data is held in accordance with Blairtummock Housing Association's Privacy Policy, a copy of this is available on request. Our systems are password protected and all electronic data is stored securely. All paper files are kept in locked cabinets.

## How long will we hold data?

We review our data retention periods regularly and will only hold personal data for as long as is necessary for the relevant activity, required by law, or as set out in any relevant contract we have with you.

## **Customer's Rights**

Customers have the right at any time to:

- ask for a copy of the information held by us in our records;
- · require us to correct any inaccuracies in information held;
- make a request to us to delete or restrict the processing of any personal data which we hold;
- object to the processing of your personal data where processing is carried out on the basis of legitimate interests;
- object to receiving any marketing communications from us.

If you would like to exercise any of your rights please contact Data Protection Officer, Linda Russell, at Blairtummock Housing Association, 45 Boyndie Street, Glasgow G34 9JL or on 0141 773 0202 or email enquiries@blairtummock.org.uk.

You have the right to complain to the Information Commissioner's Office in relation to use of your information. The Information Commissioner's contact details are noted below:

The Information Commissioner's Office Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF 0303 123 1113 www.ico.org.uk The accuracy of information held is important to us - please help us keep our records updated by informing us of any changes to your contact details.



Blairtummock Housing Association, 45 Boyndie Street, Glasgow G34 9JL

Telephone: 0141 773 0202 Email: enquiries@blairtummock.org.uk

Web: www.blairtummock.org.uk

X/blairtummockha

Blaitrummock Housing Association is an organisation committed to Equal Opportunities. If you require this newsletter in a different format, please contact the office on 0141 773 0202 where our staff will be happy to assist. Blairtummock Housing Association is a Registered Society under the Co-operative and Community Benefit Societies Act 2014 Reg No. 2354R(S)

• Scottish Housing Regulator Reg No. HCB 216 • Scottish Charity No. SC036997. Property Factor Registered Number PF000276 • VAT No: 259 1058 95

We take the issue of security and data protection very seriously and strictly adhere to guidelines published in the Data Protection Act 2018, UK GDPR and the General Data Protection Regulation (EU) 2016/679, together with any domestic laws subsequently enacted. We are notified as a Data Controller with the Office of the Information Commissioner under registration number Z6353732720 and we are the data controller of any personal data that you provide to us. Our Data Protection Officer is Linda Russell. Any questions relating to this notice and our privacy practices should be sent to Linda Russell, Blairtummock Housing Association, 45 Boyndie Street, Easterhouse G34 9 JL, by phone on 0141 773 0202 or email enquiries@blairtummock.org.uk





Blairtummock Housing Association Ltd, is subject to the rules set in the UK GDPR, the Data Protection Act 2018 and the General Data Protection Regulation (GDPR).

The Association is deemed a 'data controller' by the Information Commissioner's Office (ICO) and is required to implement working practices which meet with the requirements of this legislation.

To allow us to deliver our service, we are required to hold data on our customers. We have to be clear about what information we collect from you, how we hold it, who we share it with, and how we dispose of it.

All customers have the right to access their information, request any changes, and to have their data deleted in line with the Legislation.

### Information that we hold

#### We collect information about you from:

- Housing Applications;
- Tenancy Sign up documents;
- Tenancy Management Correspondence;
- Repair Requests;
- Factoring Agreement:
- Membership of the Association;
- Use of online services, including social media;
- Any financial transactions including benefits entitlements, and or any income and expenditure related information:
- When we receive a referral from any third party in respect of your housing arrangements or needs;
- Any other instance where you provide us with your personal information.

#### We collect the following information about you and your household:

- · Name;
- Address;
- Gender;
- Date of birth;
- Telephone numbers;
- E-mail address;
- · National Insurance Number;
- Next of kin or emergency contact;
- · Ethnicity;

- Details of any disability;
- · Housing Benefits reference number;
- Details of benefits to which you are entitled:
- Payment and bank details;
- Details of anyone authorised to act on your behalf;
- · Your dependents;
- · Previous and forwarding addresses.

#### We receive the following information from third parties:

- Benefits information, including awards of Housing Benefit/ Universal Credit;
- Payments made by you via bank transfer, Allpay or any other method;
- 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 landlords and neighbouring tenants;
- Information supplied by the relevant local council with regards to a homeless application.
- Housing application information from Kypera (software provider) & Provanhall H.A. (as we have a joint application register)
- Other statutory agencies/third sector partners

When tenants make requests for funds, bank account details may be required to transfer the amount of the fund. Once payment has been made, bank account details will be deleted.

Where you have entered into a contract with us (a lease, for example) we will process your personal data in order to implement that contract, carry out our contractual obligations and exercise our contractual rights.

Where you are required to provide us with information in terms of your lease or agreement with us, failure to do so, may result in us being unable to give effect to some terms of the contract.

In other cases, we will process your data where it is necessary for the

performance of a task carried out in the public interest (such as the provision of housing services).

We may also process your personal data as required by law and to comply with a legal obligation to which we are subject.

In some cases, we may require your consent to process certain types of personal data. Where we seek your consent, we will provide full details of what we are seeking consent for, so that you can carefully consider whether to provide consent.

## **Reason for holding this information**

- to undertake and perform our obligations and duties in relation to the services we provide;
- to respond to repair requests, medical adaption requests, housing applications or complaints;
- to use the information to improve and develop our business and the services we offer;
- to record incidents of unacceptable behaviour including health and safety information to protect staff and contractors;

- to manage rent collection, factoring charges and debt collection;
- to keep customers updated on any changes to our supplies or services and provide any information requested;
- for all other purposes consistent with the proper performance of our operations and business; and
- to request views on our services.

# **Sharing of Your Information**

The information provided to us will be treated as confidential and will be processed only by our employees within the UK. We may disclose 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, necessary information may be disclosed to our contractors;
- 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;

- 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;
- 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;
- As requested by the local authority with regards to the processing of council tax or electoral registrar;
- If requested by an emergency service;
- Housing application information from Kypera (software provider) & Provanhall H.A. (as we have a joint application register);
- Other statutory agencies/third sector partners and Scottish Housing Regulator;
- Your name and address is shared with the company who posts our newsletters, annual reports etc.;
- In order to pursue or defend legal claims.

Unless required to do so by law, we will not otherwise share, sell or distribute any of the information provided to us without consent.

Where we share personal data with third parties engaged to process personal data on our behalf we have a written contract in place which only permits them to process your data for specific purposes and in accordance with our instructions.