

Spire View Housing Association Limited

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 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?

Spire View Housing Association Limited, a Scottish Charity (Scottish Charity Number SC033266), a registered society under the Co-operative and Community Benefit Societies Act 2014 with Registered Number 2295RS and having their Registered Office at 43 Tharsis Street, Roystonhill, Glasgow, G21 2JF (“**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 2018 (“the 2018 Act”) and the General Data Protection Regulation (EU) 2016/679 (“GDPR”), together with any domestic laws subsequently enacted.

We are registered as a Data Controller with the Office of the Information Commissioner under registration number Z6952147 and we are the data controller of any personal data that you provide to us.

Our Data Protection Officer is Gillian Spence, GillianSpence@spireview.org.uk

0141 559 5644

Any questions relating to this notice and our privacy practices should be sent to Gillian Spence, GillianSpence@spireview.org.uk 0141 559 5644

How we collect information from you and what information we collect

We collect information about you to enable us to perform our contractual obligations. You, in turn, are under a contractual obligation to provide the data requested from you to enable performance of the contract (e.g. the tenancy agreement you are party to):

- when you apply for housing with us, become a tenant, request services/ repairs, enter in to 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 or factoring 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);
- from CCTV images captured by our CCTV cameras

We collect the following information about you. If you are a tenant, under the terms of the tenancy agreement, you are required to provide us with the following information.

- name;
- address;
- telephone number;
- e-mail address;
- National Insurance Number;
- Demographic information – ethnicity, race, age, date of birth, nationality;
- Share membership number;
- Payment card reference;
- Next of Kin;
- Household members;
- Bank Account details;
- Payment Card Numbers;
- Employment details, taxpayer identification numbers, tax reference codes;
- Medical Information to process an application/transfer application/undertake sheltered duties/process medical adaptation requests;
- Membership details;
- Hearing impairments;
- Health & safety information to process insurance claims;
- Disability;
- Benefits information from DWP/Housing Benefit Department;
- Passport or driving licence numbers;

We receive the following information from third parties:

- Benefits information, including awards of Housing Benefit/ Universal Credit and any overpayments requests
- 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, Local Authorities or other housing providers;
- Reports as to the conduct or condition of your tenancy, including references from previous tenancies, and complaints of anti-social behaviour;
- Health related information

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

We need your information and will use your information:

- to enable us to enter a contract with you;
- 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 which may affect you;
- for all other purposes consistent with the proper performance of our operations and business, including newsletters, website and our annual report;
- to protect your interests and / or the interest of others;
- to meet our legal obligations; and
- to 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 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 the Local Authority);
- if we are investigating payments made or otherwise, your information may be disclosed to payment processors, Local Authority and the Department for 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;
- to obtain legal advice or take legal action;
- to adhere to our statutory requirements to report to the Scottish Housing Regulator and notify the Local Authority in the event of court proceedings being raised to recover possession of a tenancy;
- if you wish to access our Welfare Rights service;
- to allow you to make payment to us through third party organisations;
- to Sheriff Officers, debt collection agencies and tracing agents in connection with any enforcement action;
- if we are processing any insurance claim made against us we will forward the claim to our insurers

Unless we have a lawful basis for disclosure, 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

We will only store your information 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.

We store your data securely in both electronic and paper format. Where a physical copy of any data is stored it is stored in a locked filing cabinet or drawer. Electronic copies of personal data are stored on our system which is accessed through password entry. Any information transmitted electronically is transmitted securely and password protected where appropriate.

Further information regarding security and storage of data can be found in our Privacy Policy http://spireview.org.uk/images/docs/policies/corporate/Privacy_Policy_.pdf

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.

Our full retention guidelines schedule is contained within our Privacy Policy, a copy of which can be obtained from our office or on our website at www.spireview.org.uk

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;
- ask us to correct any inaccuracies of fact in your information;
- request that we restrict your data processing
- data portability
- Rights related to automated decision making including profiling
- 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 our DPO Gillian Spence on GillianSpence@spireview.org.uk 0141 559 5644. **You should note**

that your rights under the GDPR and 2018 Act are not absolute and are subject to qualification.

- If you have any complaints about the way your data is processed or handled by us, please contact Gillian Spence on GillianSpence@spireview.org.uk 0141 559 5644

If you remain unsatisfied after your complaint has been processed by us, 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:

45 Melville Street, Edinburgh, EH3 7HL

Telephone: 0303 123 1115

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.