

Paisley Housing Association Privacy Notice (Fair Processing Notice)

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?

Paisley Housing Association has a group structure and within this it includes Paisley South Property Services Ltd (PSPS). This notice also applies to PSPS.

At Paisley Housing Association, we take the issue of security and data protection very seriously and strictly adhere to guidelines published in 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 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 Data Protection Officer at dpo@paisleyha.org.uk

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, with ourselves howsoever arising or otherwise provide us with your personal details
- when PSPS is appointed as factor
- when you apply to become a member of PHA, or board member of PHA/PSPS or sub committees
- 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);

- from members of your own household or other representatives for example a person with written authorisation from you to act on your behalf or a person awarded power of attorney/Guardianship. Paisley Housing Association needs to collect, process and store personal information about you and other household members (when you provide information about household members we assume that you do so with their full knowledge and consent) in order to operate as a registered provider of housing and deliver efficient and effective services.
- from other agencies such as housing providers; housing benefit departments; dwp: other third sector agencies: health professionals such as GPs; social services or the police, banks and mortgage providers.

We collect the following information about you:

• Name	• Address	• Telephone no.
• E-mail address	• National Ins No.	• Next of kin
• Tenancy references	• Previous address	• Membership Details
• Whether you keep pets	• Bank account details (only to process refunds to you)	• Benefits / salary
• Support services info	• Account balances and history of payment	• Details of debt
• Appeals documents	• Allergies	• Forwarding address
• Emergency contact details	• Medical / disability / dependency issues	• Vulnerability information
• Income and Expenditure	• Non dependent employment details	• Housing Benefit Information
• Members of your household, names, age, medical / disability information	• IP addresses and website visit histories & cookies, logs of visitors to our offices	• Logs of accidents, injuries and insurance claims
• CCTV images – if there is something in the picture that means you can be identified from it.	• Your demographic information, such as gender, race or ethnic origin, age, date of birth, marital status, nationality, education/work histories, employment details.	• Payment Card Number – we do not retain this information once transaction is concluded
• Passport number	• Driving license details	

We receive the following information from third parties:

- Benefits information, including awards of Housing Benefit/ Universal Credit & overpayment 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; Other Housing Providers; Local Authorities, Support services , tenants, owners, contractors, members of the public.
- Reports as to the conduct or condition of your tenancy, including references from previous tenancies, and complaints of anti-social behaviour obtained from various sources including Police Scotland: Other Housing Providers; Local Authorities & Support services.
- Support services information
- Police disclosures, convictions, proceedings and criminal acts where charges have been made against you.
- Information to assist us in managing your tenancy or to assist PSPS in acting as appointed factor

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 enable us to respond to tenancy / factoring enquiries
- 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 contractors, suppliers or our services which may affect you;
- to contact you in order to send you details of planned and cyclical works we are carrying out and gathering information about your needs;
- 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 contact you in the event of an emergency
- to comply with FOI rules e.g. by publishing Board and CE expenses

Sharing of Your Information

This section sets out details of when and how any of your personal data will be shared with third parties. It is important that you, as data subjects, are aware of the circumstances where your personal data may be shared.

The information you provide to us will be treated by us as confidential and will be processed only by our employees within the UK.

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 instruct repair or maintenance works and other services, your information may be disclosed to any contractor or consultants;
- 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);
- 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, stock and/ or service, your information may be disclosed to third parties assisting in the compilation and analysis of the survey results
- If we make referrals to third sector agencies and Local Authority to access support
- If we are taking a legal action your information will be passed to Sheriff Officers who will act on our behalf.
- If we are pursuing non-payments / progressing new housing applications your information may be disclosed to agencies to locate you and / or recover debt
- If we use a mailing company to send mail on our behalf.
- If we have any relevant concerns or have received information necessary for the prevention of serious harm to you, another person or abuse to a child then information will be passed to relevant Local Authority Departments/Police Scotland/Scottish Fire & Rescue Service or Ambulance Service.
- We will provide information to Social Services/Homelessness Department – names and family details in respect of imminent court action which may result in the eviction of a family.
- If we are contacted or have concerns regarding a Child Protection issue, which will include- name, address (or forwarding address) and date of birth of the tenant & household members in respect of any suspected child protection issue.
- If you have a Registered Rent we will pass your name and residency details where the rent is assessed by the Rent Officer.
- If we require to seek legal advice from the Association's Solicitors, the Local Authority and the Courts to obtain legal advice and/or in respect of any enforcement

action that may be necessary, your name; address; household details and personal details pertaining to that action.

- If we require to facilitate a legal process such as acquisitions of property.
- To deliver our subsidiary PSPS services.
- If our auditors require to verify the information we hold about you.
- If we are processing any insurance claim made against the Association we will forward the claim to our Insurers and their/our Solicitors.
- If you have agreed with us to obtain a rent card/set up a direct debit we will issue information to payment processing company which will include names and addresses of residents, bank account details.
- If we are required to submit information to The Scottish Housing Regulator for the purpose of its regulatory functions, ARC returns, /ensuring quality standards.
- If we are asked by another Housing Provider to confirm the conduct of your tenancy we will complete their relevant request but only if we have received a signed mandate from any relevant application.
- If we are asked to respond to MP, MSP's and Councillors in respect of enquiries being made on your behalf to the Association, subject to a relevant signed mandate from you.
- If you have made a complaint to a representative of the media and they contact us to confirm the facts of a situation you have made a statement about, subject to a relevant signed mandate from you.
- If we receive notification that a person is looking to act on your behalf, we will require written permission from you/official notification of Guardianship.
- If you have submitted a complaint to the Scottish Public Services Ombudsman or First Tier Tribunal - we will forward all details pertaining to the original complaint and information requested from the ombudsman/ First Tier Tribunal.
- **FLAIR** – Federation of Local Associations in Renfrewshire & East Renfrewshire.
- **i-FLAIR** - Federation of Local Associations in Renfrewshire & East Renfrewshire and Inverclyde
- **Relevant Authorities** – National Accommodation Strategy for Sex Offenders
- 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;
- Our IT support provider have access to all our data by the nature of the service they provide to us but don't actually need to access individual data other than in the course of data recover or incidentally during their house keeping.

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/ EEA.

Security

We understand the requirements of confidentiality, integrity and availability for the personal data we process.

We are committed to protecting the security of your personal data. We use a variety of security technologies and procedures to help protect your personal data from unauthorised access, use or disclosure. For example, we store the personal data you provide on computer systems that have restricted & controlled access. When we transmit highly confidential data (such as a credit card number) over the Internet, we protect it through the use of encryption, by our third party provider.

We have an information security policy and take steps to make sure the policy is implemented.

We have an ICT Disaster Recovery Policy & Procedures to ensure that we can restore access to personal data in the event of any incidents, such as by establishing an appropriate backup process.

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 schedule is available at our office or on our website.

How we use your information to make automated decisions –

We sometimes use automated systems to make decisions relating to or about you. This helps us to make sure our decisions are quick, fair, efficient and correct, based on what we know. Automated decisions can affect the services we may offer you and processes we use now or in the future. They are based on personal and business information that we have or that we are allowed to collect from others.

We will also explain the rights you have to challenge decisions using personal information made this way.

Here are the types of automated decision we make:

- **Tailoring services and information**

We may place you in groups with similar customers. These are called customer groupings. We use these to study and learn about our customers' needs, and to make decisions based on what we learn. This helps us to design processes and services and to manage our relationships with you. It also helps us tailor the information that we send or that is shown on our own and other websites and mobile apps, including social media.

- **Management of processes and services**

We use systems to decide how we progress processes and services such as arrears and estate management, such as identifying what stage in a process you are and what correspondence you should receive from us.

- **Selection of Applicants for Housing**

We use a system to decide who should be offered re-housing for a vacant property. It uses information you have provided to assess your housing needs and priority.

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, or ask us to restrict the processing of your personal data:.

If you would like to exercise any of your rights above please contact us at dpo@paisleyha.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:

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.