



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?

Ochil View Housing Association Ltd, a Scottish Charity (Scottish Charity Number SC033130, a registered society under the Co-operative and Community Benefit Societies Act 2014 with Registered Number 2310R(S) and having their Registered Office at Ochil House, Marshill, Alloa FK10 1AB take the issue of security and data protection very seriously and strictly adhere to guidelines published in the Data Protection Act 2018 and the GDPR 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 Z6011839 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 the Head of Finance and Corporate Services/Depute Director at Ochil House, Marshill, Alloa FK10 1AB (Telephone 01259 727478).

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 or shared owner, 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/ 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);

We may collect the following information about you:

- Name;
- Address;
- Date of birth;
- Telephone number;
- E-mail address;
- National Insurance Number;
- Details of household members, including children;
- Next of Kin;
- Medical information;
- Employment details;
- Universal Credit Journal information;
- Bank details;
- Details of payments you make to us;
- Personal financial information;
- Previous debt information;
- Medical Information;
- Social work/support needs;
- Sensitive data such as ethnic origin, gender, religion
- Registered Sex Offender information;
- Details of complaints
- Details of anti-social behaviour;
- Forwarding address (in the event that your tenancy ends)

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;
- Reports as to the conduct or condition of your tenancy, including references from previous tenancies, and complaints of anti-social

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 or supplies which may affect you;
- for all other purposes consistent with the proper performance of our operations and business; 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 by our employees within the UK/EEA. On occasion some information may be processed outside of the UK/EEA (see section on "Transfers outside the UK and Europe). 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 you apply for housing through us, your details will be registered with Homehunt, a choice based lettings agency operated by a number of Housing Associations in Scotland;

- 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 your home requires a repair, general maintenance or other work to be done then we may share your information with our contractors in order that they can carry put these services on our behalf;
- 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;
- In the event that your tenancy falls into arrears, your details may be shared with our collection agencies or our legal advisers;
- We may share your details with local charities, the Citizens Advice bureau or other appropriate agencies in order to support you in your tenancy

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

Most of your personal information will only be stored within the UK and EEA. However, for the purposes of customer satisfaction surveys we may transfer some personal information outside the UK or EEA.

- Where information is transferred outside the UK or EEA we ensure that there are adequate safeguards in place to protect your information in accordance with this notice, including using companies who are Privacy Shield certified (which is determined by the European Commission to be an adequate level of protection), or ensuring the organisation we are transferring your information to has signed up to the Standard Contractual Clauses for Processors as required by the European Commission or ensuring the level of protection provided by the organisation has been assessed as adequate in the circumstances of the case.

Security

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

- Ensuring that our systems are password protected and that passwords are changed regularly;
- Ensuring that only authorised staff have access to your personal information;
- Ensuring any transfer of your personal data to a third party is password protected and/or encrypted;
- Ensuring we have appropriate arrangements in place with third parties to whom we transfer your data to ensure they are also complying with their data protection obligations;
- Ensuring that access to our building is restricted to authorised persons only

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 the following periods:

- Applications for accommodation – 6 years
- Tenancy/Factored owners files – 6 years from end of tenancy
- Information regarding housing benefit, health records, records re offenders – for the duration of the tenancy
- Complaints – 6 years

after which these will be destroyed if it is no longer required for the reasons it was obtained.

Our full Data Retention Policy and schedule is available from our offices at Ochil House, Marshall, Alloa FK10 1AB or can be downloaded from our website.

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 the Director of Finance and Corporate Services/Depute Director at Ochil House, Marshall, Alloa FK10 1AB, by telephoning on 01259 722899 or by emailing us at customerservices@ochilviewha.co.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 updated by informing us of any changes to your email address and other contact details.

Approved