WILLIAMSBURGH
HOUSING ASSOCIATION LTD

Privacy Notice

(How we use your personal information)

Introduction

This Privacy Notice explains what personal information we process, 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 Privacy Notice is to explain to you the reasons why we may hold and process your personal data and explain your rights under the current data protection laws.

This Privacy Notice explains how we collect and use personal information about visitors to our website and premises, tenants, owners, contractors/suppliers, customers, shareholding members and job applicants. Separate versions of Privacy Notices are issued to our Employees and Management Committee members.

The Housing Association controls and processes a range of information about you. In this Privacy Notice your 'personal information' means your personal data i.e. information about you from which you can be identified. Your personal information does not include data where your identity has been removed (anonymous data). It is important that the personal information that we hold and process about you is accurate and up to date. Please keep us informed if your personal information changes during your engagement with us

Who are we?

Williamsburgh Housing Association Limited, recognised Scottish Charity Number SC035350, Scottish Housing Regulator Number HAL 207, a registered society under the Co-operative and Community Benefit Societies Act 2014 with Registered Number 1991RS and having their Registered Office at Ralston House, Cyril Street, Paisley, PA1 1RW ("**we**" or "**us**") take the issue of security and data protection very seriously and strictly adhere to guidelines published in the Data Protection Act 2018 (the 2018 Act) and the UK General Data Protection Regulation (UK GDPR), the Data (Use and Access) Act 2025 together with any laws subsequently enacted.

We are registered as a Data Controller with the Office of the Information Commission (IC) under registration number Z7794164 and we are the data controller of any personal data that you provide to us.

Our Data Protection Officer is:

RGDP LLP
Level 2, One Edinburgh Quay
133 Fountainbridge
Edinburgh
EH3 9QG

Telephone: 0131 222 3239
Email: info@rgdp.co.uk

Any questions relating to this notice and our data protection practices should be sent to admin@williamsburghha.co.uk

Where does your personal information come from?

The Housing Association may collect information in the following ways which include personal data which you have provided to us in:

- Housing applications
- Correspondence about your tenancy or property maintenance
- Repair requests
- Factoring agreements
- Tenancy sign-up documents
- Complaints
- Arrangements to make payment to us
- Use of online services, website, social media etc.
- Membership applications

We may also record factual information whenever you contact us or use our services, as well as information about other action we take, so that we have an accurate record of what happened.

We may also receive information from other, third parties, as detailed below.

We may process the following personal information from you (and members of your household):

- Name
- Address
- Protected characteristics data, as defined by the Equality Act 2010
- Date of birth
- Health and medical details
- Care & support information
- Employment details
- Criminal convictions
- Phone number
- E-mail address
- Other contact details
- National Insurance number
- Unacceptable behaviour warnings
- Payment information
- CCTV imagery
- Telephone call recordings
- Signature
- Tenancy details, as defined within a Tenancy Agreement
- Next of kin
- Emergency contact
- Marital status
- Bank account details
- Tenancy dates
- Household composition
- Repairs requested
- Shareholding Membership Number

We may also process the following information about you (please note that this list is not exhaustive):

- 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 and Community Safety Glasgow
- Reports as to the conduct or condition of your tenancy, including references from previous landlords, and complaints of anti-social behaviour
- Support needs of vulnerable tenants, including medical reports for medical adaptations and Social Work reports for applications;
- Information supplied by the local authority relating to homeless applications
- New home owner details
- Tracing and employment details

We receive this information from:

- Local Authorities
- Health professionals
- Charities
- Other registered social landlords
- Legal Advisors
- Contractors and suppliers who have undertaken works on our behalf
- MPs, MSPs and councillors
- Utility companies
- Household members
- Debt collection agencies
- Department of Work and Pensions
- HMRC

We may use this personal information to:

- Undertake and perform our obligations and duties in relation to the services we provide as your landlord or factor
- Enable us to supply you with the services and information that you have requested
- Respond to repair requests, housing applications, complaints and requests for medical adaptations
- Improve and develop the services we offer
- Keep you updated on any changes to our services
- Monitor our performance in relation to service delivery
- Refer you to other organisations that may support you
- Meet our legal obligations (this includes information we have to provide to regulators and statutory authorities)
- Keep you updated on any changes to our services
- Progress all other purposes consistent with the proper performance of our operations and business
- Contact you for your views on our products and services

If you do not wish to provide your personal data

You have obligations under your contract/potential contract with us to provide us with the necessary data. If you do not provide this information, this may prevent the Association's ability to enter into or maintain a contract with you.

Who might my data be shared with, or seen by?

We may disclose your personal data to any of our employees, officers, contractors, insurers, professional advisors (including legal advisers and our Data Protection Officer), agents, suppliers or subcontractors, selected third parties, government agencies and regulators and healthcare providers insofar as reasonably necessary, and in accordance with data protection legislation.

We may also disclose your personal data:

- With your consent;
- To the extent that we are entitled or required to do so by law;
- 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, maintenance or upgrade works, your information may be disclosed to our contractors;
- If investigations are ongoing in relation to a complaint or crime, information may be disclosed to the Scottish Public Services Ombudsman, Police Scotland, Local Authority departments, Scottish Fire & Rescue Service, elected members 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 need to protect our finances when you have vacated a property, we may disclose your personal data (name and forwarding address only) to utility companies, or debt collection agencies.
- 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 required by an emergency service;
- 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 required by law, we will disclose your information to statutory bodies such as auditors or solicitors;
- If your household is threatened with homelessness, your information may be shared between us and Local Health Authority and Social Care Partnership(s);
- If you request that we share your information with other RSLs who may assist in re-housing you;
- If we are pursuing debt recovery, your information may be disclosed to our solicitors and Local Authority, or a third party agency to assist in the recovery of those debts;
- If we are making an insurance claim following an incident we may share your information with our insurers;
- If we need to facilitate the payment of any benefits, your information may be disclosed to the Department of Work and Pensions, Local Authority or any other relevant department;
- If the Local Authority is processing information about your council tax or relating to the electoral register, your information may be disclosed to them; and
- If required by a regulatory body, such as the Scottish Housing Regulator, Financial Conduct Authority or the Office of the Scottish Charity Regulator.

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.

What are the legal bases for us processing your personal data?

We will only process your personal data on one or more of the following legal bases:

- contract
- consent
- our legitimate interests (including CCTV imagery, telephone recordings, vacant property management, youth advisory panel, payment predictions, and sending service bulk SMS)
- vital interests
- public interest/official authority
- where we have a legal obligation to do so
- where there is a redefined legitimate interest, as defined under the Data (Use and Access) Act 2025 and by the relevant Secretary of State

Processing special category personal data

Special categories of personal data means information about your racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; health; sex life or sexual orientation; criminal convictions, offences or alleged offences; genetic data; or biometric data for the purposes of uniquely identifying you.

The special categories of personal information referred to above require higher levels of protection. We need to meet additional legal requirements for collecting, storing, and using this type of personal information.

Our legal basis for processing your special category data is:

(a) Explicit consent
(b) Employment, social security and social protection (if authorised by law)
(c) Vital interests
(d) Not-for-profit bodies
(e) Made public by the data subject
(f) Legal claims or judicial acts
(g) Reasons of substantial public interest (with a basis in law)
(h) Health or social care (with a basis in law)
(i) Public health (with a basis in law)
(j) Archiving, research, and statistics (with a basis in law)

Where do we keep your data?

Your information will only be stored within the United Kingdom except where international transfers are authorised by law.

How do we keep your data safe?

When we are provided with personal data, we take steps to make sure that your personal information is kept secure and safe. All data is held in accordance with WHA's data protection policies and procedures. Our systems are password protected and all electronic data is stored securely. All paper files are kept in locked cabinets.

How long do we keep your data?

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/best practice, or as set out in any relevant contract we have with you and in accordance with our Data Retention Policy and Schedule.

Your rights

You have the right at any time to exercise your data subjects' rights in relation to the following:

- the right to be informed
- the right to access
- the right to rectification
- the right to object to processing
- rights in relation to automated decision making and profiling
- the right to be forgotten
- the right to data portability
- the rights to restrict processing

When you make a request, we are required to verify your identity and may ask you for specific information to fulfil this purpose. Normally, you will not need to pay a fee when you make any of the above requests, but we may charge a reasonable fee or refuse to comply if your request for access is clearly unfounded or excessive.

If you would like to exercise any of your rights above, please contact admin@williamsburghha.co.uk in the first instance. You should note that your rights under the UK GDPR and 2018 Act are not absolute and are subject to qualification.

It is important that the personal information that we collect, hold and use about you is accurate and current. Please keep us informed of any changes by contacting admin@williamsburghha.co.uk .

Queries and Complaints

If you are not satisfied with our handling of your request, in the first case you should contact us with your complaint so that we can investigate. Complaints over handling your rights should be sent to admin@williamsburghha.co.uk and marked GDPR Complaint.

Our Data Protection Officer is provided by RGDP LLP and can be contacted either via 0131 222 3239 or info@rgdp.co.uk

If you still remain unsatisfied after your complaint has been processed by us, you also have the right to complain to the Information Commission in relation to our use of your information.

The Information Commission's contact details are noted below:

Information Commission / Telephone: 0303 123 1113 /Online: Make a complaint | ICO

This Privacy Notice was last updated on 28th October 2026
Next review October 2028