



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?

Williamsburgh Housing Association Limited, a Scottish Charity (Scottish Charity Number SC035350), 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 and the General Data Protection Regulation (EU) 2016/679, together with any domestic laws subsequently enacted.

We are notified as a Controller with the Office of the Information Commissioner’s Office under registration number Z7794164 and we are the controller of any personal data that you provide to us.

Any questions relating to this notice and our privacy practices should be sent to Gaynor Corry, Data Protection Officer, telephone number 0141 847 6381, e-mail gaynor@williamsburghha.co.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 and maintenance, enter in to a factoring agreement, or contact us in your position as a tenant or a factored owner, 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); and
- from CCTV images captured by our CCTV cameras

We collect the following information about you:

- name;
- address;
- telephone number;
- e-mail address;
- National Insurance Number;
- Demographic information – ethnicity, race, age, date of birth, nationality;
- Immigration status and your right to reside in the UK (if applicable);
- Share membership number;
- Payment card reference;
- Next of Kin;
- Household members and your relationship with them;
- Bank Account Number & Bank Statements;
- Income details;
- Payment Card Numbers;
- Employment details, taxpayer identification numbers, tax reference codes;
- Medical Information to process an application/transfer application, process medical adaptation requests;
- Membership details;
- Hearing impairments;
- Health & safety information to process insurance claims;

- Complaints made by you;
- Disabilities – Mental and Physical;
- Benefits information from DWP/Housing Benefit Department;
- Passport or driving licence numbers;
- Personal Identification documents;
- IP addresses and website visit history;
- Emergency contact details;
- Support providers and support provision
- Key holders;
- Representatives;
- Due Date (if pregnant);
- Previous addresses, dates of residency and why you left the property;
- References from previous landlords;
- Correspondence addresses;
- Why you are applying for rehousing with us;
- If you are being harassed, details of harassment;
- If you, or a member of your household have been subject to any form of anti-social behaviour;
- Criminal convictions; and
- If you have any personal connections with us.

We receive the following information from third parties:

- Benefits information, including awards of Housing Benefit/Universal Credit and any 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, Community Safety Partnership, 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 and social care related information;
- Support information;
- Debt repayment arrangements; and

- Reports in relation to Community Regeneration projects that you may have signed up to, including workshops, interviews or volunteering events you may attend from time to time;

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

We need your information and will use your information:

- to assess your application for housing with us;
- to enable us to enter a contract with you;
- 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 manage your housing as landlord, including responding to your repair and adaptation requests, processing and administering your rent and service charge payments, arranging appointments and contractor visits, arranging utility suppliers for you and responding to any complaints made by or about you;
- to monitor your compliance with the tenancy agreement signed at the start of your contractual relationship with us;
- to comply with our legal obligations under housing legislation, the Equality Act 2010, the Antisocial Behaviour etc. (Scotland) Act 2004 and other regulatory requirements of the Scottish Housing Regulator;
- 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; and
- to contact you for your views on our products and services.

When we use your information, we are required to have a lawful basis under applicable data protection law. The lawful bases we may rely on include:

- **consent:** where you have given us clear consent for us to process your personal information for a specific purpose. This will only apply in limited circumstances where we have clearly asked for your consent;
- **contract:** where our use of your personal information is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract. This includes where you apply for housing and in order to enter into and perform your tenancy agreement;
- **legal obligation:** where our use of your personal information is necessary for us to comply with the law. This includes our regulatory obligations, such as those imposed on us by the Scottish Housing Regulator;
- **vital interests:** where our use of your personal information is necessary to protect you or someone else's life;
- **public task:** where our use of your personal information is necessary for us to perform a task in the public interest or for our official functions and the task or function has a clear basis in law. This may apply to our public functions as a registered social landlord; and
- **legitimate interests:** where our use of your personal information is necessary for our legitimate interests or the legitimate interests of a third party (unless there is a good reason to protect your personal information which overrides our legitimate interests).

A legitimate interest is when we have a business reason to use your information. Our legitimate interests include promoting our activities or new services, which does not include our public functions. Where we process your personal information in pursuit of our legitimate interests, you have the right to object to us using your personal information for the above purposes. If you wish to object to any of the above processing, please contact Gaynor Corry, Data Protection Officer, telephone number 0141 847 6381, e-mail gaynor@williamsburghha.co.uk

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, Community Safety Partnership, 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, the Department of Work & Pensions, Solicitors, Paisley Sheriff Court and Citizens' Advice Bureau;
- 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 we are conducting surveys in relation to potential Community Regeneration work or Community priorities for such work, your information may be disclosed to third parties assisting in the compilation and analysis of the survey results;
- if our Community Regeneration team are working with you on employability matters or similar projects;
- 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;
- in connection with regeneration projects;
- 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; and
- in relation to Council Tax matters.

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

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 on our staff computers. Any information transmitted electronically is transmitted with appropriate security measures depending on the nature of the information being transmitted, and password protected where appropriate.

Further information regarding security and storage of data can be found in our Privacy Policy, which is available from our office, on request.

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 available from our office, on request.

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;
- ask that we restrict the processing of your personal data for specific purposes;
- obtain the personal data that we hold about you and reuse it for your own purposes;
- make a request to us to delete what personal data of yours we hold; and
- object to processing in certain circumstances.

If you would like to exercise any of your rights above, please contact Gaynor Corry, Data Protection Officer, telephone number 0141 847 6381, e-mail gaynor@williamsburghha.co.uk
Any requests received by us will be considered under applicable data protection legislation.

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 Office's contact details are noted below:

The Information Commissioner's Office – Scotland,
Queen Elizabeth House,
Sibbald Walk,
EDINBURGH,
EH8 8FT.

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.