

BUIDHEANN TIGHEADAS LOCH AILLSE AGUS AN
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LOCHALSH AND SKYE HOUSING ASSOCIATION

GDPR Fair Processing Notice
(How we use your personal information)

Introduction

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?

We are Lochalsh & Skye Housing Association. We take the issue of security and data protection very seriously and strictly adhere to guidelines published in the UK GDPR and Data Protection Act 2018, together with any domestic laws subsequently enacted.

We are registered as a Data Controller with the Office of the Information Commissioner under registration number **Z6024339** and we are the data controller of any personal data that you provide to us.

Our Data Protection Officer is our Legal Services Manager. Any questions relating to this notice and our privacy practices should be sent to Info@LSHA.co.uk or addressed to our office.

How we collect information from you and what information we collect

We collect information about you:

- On the forms completed and in any correspondence or discussions with you when you apply for housing with us, become a tenant, a shared owner or a shared equity owner, request services such as, but not limited to, Energy Advice, Handyperson, Care and Repair, request repairs, enter into a factoring or other agreement with ourselves or otherwise provide us with your personal details;
- when you apply to become a member of the Association or a member of our Board;
- from your use of our services (including 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 some but not necessarily all of the following information about you, dependant on which service(s) you use or require:

- Name;
- Address;
- Telephone number;
- E-mail address;
- National Insurance Number;
- Next of Kin;
- Photographic ID;
- Equality and diversity information, including special categories of personal data (also called sensitive personal data), which includes information about your health, religion, gender re-assignment, age, marriage and civil partnership, sex, sexual orientation and racial or ethnic origin, such as gender and ethnic group (this is voluntary and can only be recorded and used by us with your explicit consent. You can also withdraw your consent at any time);
- Communication requirements such as your preferred language and your preferred communication format;
- Qualifications;
- Current employment, earnings, savings and other relevant financial information to assess your eligibility for shared equity or shared ownership housing.

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 behaviour or other related behaviour;
- Medical and/or sensitive personal data from occupational therapists, GPs or social services, where they are legally entitled to share this data with us;
- Mortgage /loan information;
- Property valuations.

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 any contract we may have with you;
- to enable us to supply you with the services and information which you have requested from us or through others for whom we act as agents;
- 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 and amend, as necessary, our policies and procedures;
- to contact you in order to send you details of any changes which may affect you;
- to comply with external reporting requirements: it is a requirement of the Scottish Housing Regulator to record and report the diversity characteristics of tenants where this information has been provided to us with your explicit consent;
- to allow us to make contact with you in the most appropriate way. For example, we can provide literature in large print if you have difficulty reading smaller print; or provide documents in an alternative language if English is not your preferred language; and
- to protect people from unlawful discrimination; it will be used to report anonymously to our key internal stakeholders to ensure that our services are inclusive, meet peoples' needs and are not discriminatory. For example, by reviewing anonymous customer complaints by age or disability we can ensure that certain groups of tenants are not disproportionately dissatisfied with our service, or subject to discrimination;
- to have an understanding of your personal situation and individual needs will help us to provide a tailored service that meets any physical, cultural or financial needs that you may have;
- to meet our equality commitments as part of our Equality and Diversity Policy: we place great importance on listening and responding to your needs, promoting your interests and enhancing trust. This can include making reasonable adjustments in specific circumstances to ensure a particular resident's support needs or accessibility requirements are respected and met, or it can mean implementing positive action initiatives and using the data we collect to improve our policies, procedures and services more generally.
- It will be used to support you to effectively manage and sustain your tenancy, including, but not limited to: providing welfare benefit advice and housing management to ensure compliance with the terms of your contract with us;
- for all other purposes consistent with the proper performance of our operations and business; and
- to contact you for your views on our services. In circumstances where we may wish to use your personal data to help us improve our services for you (including, but not limited to, involvement in our resident scrutiny processes), we will explicitly seek your consent.

Sharing of Your Information

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 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, NHS Highland and others involved in any complaint, whether investigating the complaint or otherwise;
- if we are updating tenancy or ownership details, your information may be disclosed to third parties (such as utility companies, Scottish Government and the Local Authority);
- if we are investigating payments made or otherwise, your information may be disclosed to payment processors, the Local Authority and the Department of Work & Pensions;
- if we are conducting a survey of our services, your information may be disclosed to third parties assisting in the compilation and analysis of the survey results;
- when administering the purchase and sale of shared equity or shared ownership housing we will share your information with Scottish Government and their solicitors, your solicitors, your valuers/surveyors and your lenders, and some information may be shared with the owner or prospective purchaser of the property;
- when we provide products and/or services in terms of the Handyperson and Care and Repair Services;
- when we have identified a wellbeing support need or have a serious safeguarding concern and need to report an urgent situation to Police Scotland, health services or social work for their advice and assistance and there are information-sharing protocols in place.
- individuals or organisations who have been granted third party authority or power of attorney;
- when we provide services in connection with our Energy Advice Service

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.

Your information will only be stored in the UK.

Security

When you give us information we take steps to make sure that your personal information is kept secure and safe. If you wish to see the security measures that are in place, please view our Privacy Policy on the LSHA website or in our office.

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 to view on the LSHA website or in our office.

Your Rights

You are entitled to request access to the information held about you and may do so in person, by phone, email or letter. You may also make a request to us to delete any personal data of yours we hold. We may however require appropriate identification documents from you to ensure you are who you claim to be and are entitled to obtain or delete this information.

Please help us keep our records accurate and up to date by informing us of any changes to your personal data.

To do so, you can:

- Email us: info@LSHA.co.uk
- Phone: 01478 612035
- Speak to one of our members of staff
- Write to : Lochalsh and Skye Housing Association, Morrison House, Bayfield, Portree, Isle of Skye, IV51 9EW

If you have any complaints about the way your data is processed or handled by us, please contact our Legal Services Manager who is also our Data Protection Officer at the email address above.

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
Queen Elizabeth House, Sibbald Walk, Edinburgh, EH8 8FT
Telephone: 0303 123 1115
Email: Scotland@ico.org.uk
