



# **Craigdale Housing Association**

## **CUSTOMER PRIVACY NOTICE**

**(Tenants, Shared Owners & Factored Owners)**

### **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 process your personal data.

## Who are we?

**Craigdale Housing Association**, registered as:

a Scottish Charity (Scottish Charity Number SCO31879),  
a registered society under the Co-operative and Community Benefit Societies Act 2014 with Registered Number 2296 RS  
Registered with the Scottish Housing Regulator, Number HCB 95  
a Property Factor, Registered Number PF000223

and having our Registered Office at: **83-85 Dougrie Road, Castlemilk, Glasgow, G45 9NS**

Craigdale Housing Association takes the issue of security and data protection very seriously , including compliance with the UK General Data Protection Regulation, the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations.

We are notified as a Data Controller with the Information Commissioner's Office under registration number Z5480995 and we are the data controller of any personal data that you provide to us.

## How we collect information from you and what information we collect

We collect information about you:

- name;
- address;
- telephone number;
- e-mail address;
- National Insurance Number;
- Next of Kin;
- Date of birth
- Signature
- Unacceptable behaviour records and criminal activity
- Household composition, including details of existing accommodation arrangements and family members seeking accommodation with the applicant
- Tenancy details, including start and end dates, rent paid, under and over payments and arrears
- Repairs: repairs requested, access details and completion dates
- Shareholding membership number
- Protected characteristics data, as defined by the Equality Act 2010
- Health Information relevant to application or tenancy
- Employment details, including benefit / council tax status and payments
- Bank details

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 receive the following information from third parties:

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- 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, Social Services and/or Local Authorities;
- Reports as to the conduct or condition of your tenancy, including references from previous tenancies, and complaints of anti-social behaviour
- Medical reports for medical adaptations and Social Work reports for applications;
- Contractors and suppliers who have undertaken works on our behalf
- Legal advisors
- Health professionals
- Local Authorities
- Charities
- MPs, MSPs and councillors
- Other registered social landlords
- Utility companies
- Household members
- Tracing and Employment details from debt collection agencies

### **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;
- Enable us to supply you with the services and information that you have requested;
- Enable us to respond to your repair request, housing application and complaints made;
- Analyse the information we collect so that we can administer, support, improve and develop our business and the services we offer;
- Contact you in order to send you details of any changes to our or suppliers that may affect you;
- Progress all other purposes consistent with the proper performance of our operations and business; and
- Contact you for your views on our products and services.

### **Sharing of your information**

We may disclose your personal data to any of our employees, officers, contractors, insurers, professional advisors, agents, suppliers or subcontractors, utility companies, government agencies and regulators, local authorities trusted third parties and healthcare providers insofar as reasonably necessary, and in accordance with data protection legislation.

We may also disclose your personal data:

- If we enter into a joint venture with or merge 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 / Council and/or Council 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 / Council and/or Council departments);
- If we are investigating payments made or otherwise, your information may be disclosed to payment processors, Local Authority / Council and/or Council Departments and the Department of Work & Pensions;
- We may share details with our Data Protection Team and/or Legal Advisors
- 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 you are using an advice or advocacy service (such as a solicitor, advice agency or otherwise) we will share relevant information with them where it is necessary to progress your case.
- If you request that we share your information with other RSLs who may assist in re-housing you.
- If your household is threatened with homelessness, your information may be shared between us and Local Health Authority and Social Care Partnership(s).
- If we are pursuing debts associated with a tenancy or a former tenancy we may share your basic information with 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 are being audited then we may share your information with our auditors.
- Where there is a legal action that involves you such as action to recover a tenancy your information may be shared with a solicitor to assist in the legal process.
- Where there is a legal requirement.

### **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 void property management
- vital interests
- the performance of a task carried out in the public interest and / or with official authority
- legal obligation

### **Special categories of 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 sensitive 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.

## **Transfers outside the UK**

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

## **Security**

When you give us information, we take steps to make sure that your personal information is kept secure and safe. All information is kept in line with our data protection policies and procedures.

We will not usually retain your payment details unless you make payments to us Using Direct Debit.

Our computer systems are located in our main office, however our staff may occasionally use laptops, tablet or other devices offsite, i.e. for homeworking. In instances where devices are used remotely this will be secure and under strict control at all times.

Additionally, we have the following controls in place to ensure the security of your personal information:

- All paper based records are securely locked in storage cupboards when not actively being Used.
- Our offices are protected by an alarm system and a security company
- All Craigdale Housing Association computer servers are within a secure network
- Systems are password protected, patch updates to our servers are implemented and we regularly review system access rights.
- All electronic communication takes place within this secure environment.

The unauthorised use of IT systems is prevented by:

- User ID
- Password assignment
- Lock screen with password activation

## **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 periods as recommended by law. Once the periods have expired, the information will be destroyed if it is no longer required for the reasons it was obtained. Our full retention schedule is available by contacting the office on 0141 634 6473, emailing us on [dataprotection@craigdaleha.co.uk](mailto:dataprotection@craigdaleha.co.uk) or from the website: [www.craigdaleha.co.uk/](http://www.craigdaleha.co.uk/)

## 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;
- in certain situations, make a request to us to delete your personal data;
- request we restrict processing your personal data;
- object to the processing;
- object to us processing your personal data; and
- right to portability

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.

## Queries and Complaints

Any questions relating to this notice and our privacy practices should be directed, in the first instance, to [dataprotection@craigdaleha.co.uk](mailto:dataprotection@craigdaleha.co.uk) or by telephoning 0141 634 6473.

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

Telephone: 0303 123 1113

Online: [Make a complaint | ICO](#)