



TENANT - FAIR PROCESSING NOTICE (FPN)

**Drumchapel
Housing
Co-operative
Limited**

**Drumchapel Housing Co-operative Ltd.
(How we use your personal information)**

This notice explains what information we collect, when we collect it and how we use this. During 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 and who you can contact if you need further information.

4 Kinclaven Avenue
Drumchapel
G15 7SP

Who are we?

Drumchapel Housing Co-operative, a Scottish Charity (Scottish Charity SCO46239) a registered society under the Co-operative and Community Benefit Societies Act 2014 with Registered Number HAC 185 and registered with the Financial Services Agency, Reg. No. 2222R(S) having their Registered Office at 4 Kinclaven Avenue, Glasgow, G15 7SP takes the issue of security and data protection very seriously and strictly adheres to guidelines published in the General Data Protection Regulation that has been applicable from the 25th May 2018, together with the Data Protection Act 2018.

The information we collect from you will, primarily, be basic personal and contact details required to carry out our major functions as a social housing provider, however there are occasions where we are required to collect data of a more sensitive nature and this will be treated with the appropriate level of confidentiality.

This Fair Processing Notice should tell you everything you need to know about:

- What information we collect
- Why we collect it
- Who we share it with and why
- How we store it

We are notified as a Data Controller with the Information Commissioner's Office (ICO) under registration number **Z7608144** 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

How we collect information about you:

- when you apply for housing with us, become a tenant, request services/repairs, 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 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);

What information we collect about you:

- Personal; name, addresses, date of birth.
- Contact; home phone number, mobile number, and e-mail address
- Further: NI number, gender, ethnicity, disability, medical details, marital status, signature, event photographs, CCTV images,
- Tenancy; start/end dates, rent paid, under/over payments, bank account details, 3rd party payment details, mortgage provider, solicitor details.
- Employment; Benefit/Council tax status and payments, employment history, education history, tax code, criminal record declaration
- Household composition; Existing arrangements, family members seeking accommodation with applicant, repairs requested.
- Complaints; communications regarding behaviour or other breaches of your contract with us, anti-social behaviour, and references from other tenancies.

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

We need your information and will use your information to:

- Provide an efficient service in our contract as landlord.
- Process and manage housing applications and sign up new tenants to suitable properties.
- Meet legal obligations and supply you with the services and information that you have requested.
- Provide an efficient maintenance service with enough resources to carry out all functions providing value for money.
- 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 suppliers that may affect you
- Contact you for your views on our products and services.
- Facilitate any necessary legal proceedings and adhere to statutory regulations.
- Manage payments for accounting purposes including issuing invoices
- Progress all other purposes consistent with the proper performance of our operations and business.

Sharing of your information

All personal data we process is processed by our staff in the UK. We sometimes need to share personal information with other organisations, however where this is necessary, we are required to comply with all aspects of GDPR. We do not give anyone else access to your information in return for payment, for their marketing or commercial purposes.

Drumchapel Housing Co-operative may enter into partnerships with other organisations such as local authorities and the police. We will enter into a formal data sharing agreement to govern the process and ensure it is lawful. We will share specific and relevant information with law enforcement, government or public bodies and statutory agencies where we are legally required to do so in order to aid:

- The prevention or detection of crime and fraud
- The apprehension or prosecution of offenders
- The assessment or collection of tax or duty owed to customs and excise
- Sharing in connection with legal proceedings
- 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*
- Sharing in relation to the physical or mental health of an individual, where disclosure is required to protect them or others from serious harm
- 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.
- 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;
- To fulfil our legal and regulatory obligations to bodies such as the Scottish Housing Regulator, Financial Conduct Authority or the Office of the Scottish Charity Regulator.

Drumchapel Housing Co-operative remains responsible for the fair and lawful processing of all personal data shared with suppliers. We only share

information with external organisations or agencies if you have given consent, or if we have a signed agreement to do so ensuring all data they manage remains compliant with GDPR

Contractors and suppliers

We may share your personal information with our suppliers who provide a service to you, or who provide services on our behalf. The data shared is the specific information the supplier requires to carry out their task, as well as any information that ensure we fulfil our health and safety obligations to the people carrying out the task. We may share this information with the following organisations:

- Maintenance Contractors and suppliers
- Insurance brokers
- Printing and mail distribution
- Customer surveys
- Banks
- Payment card, direct debit and billing solutions
- Document storage and archive scanning

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.

How we store your personal information

We are committed to holding your personal information securely. This means only those of our colleagues and contractors that need to see it have access. All computers are password protected and our electronic files kept on shared network accessed by our computers are controlled by strict access permissions so data is only available to those who need to use it. Our computer systems are located in our offices in Drumchapel, but we occasionally may use computers (including laptops and tablets) offsite, however they will at all times remain secure and under our control. Paper files containing personal or sensitive information will be kept in locked drawers, cabinets or rooms.

We will keep your personal details for no longer than necessary. More information on our retention schedule can be found in our Retention Policy which is available by contacting the office on 0141 944 4902, emailing us on DPO@drumchapelhc.org.uk or from our website: at <https://www.drumchapelhc.org.uk/>

Since 11 November 2019, Drumchapel Housing Co-operative Ltd is considered a Public Authority under the Freedom of Information (Scotland) Act 2002 and is, therefore, required to appoint a Data Protection Officer (DPO). We have engaged RGDP LLP (www.rgdp.co.uk) to act as our Data Protection Officer. To contact them, please email info@rgdp.co.uk Please also copy us in at: DPO@Drumchapelhc.org.uk

Your rights

You have the right at any time to ask for a copy of the information held about you; require us to correct any inaccuracies; in certain situations delete your personal data; and object to receiving any marketing communications from us. If you would like to exercise any of your rights above please contact us on 0141 944 4902 or DPO@drumchapelhc.org.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 Office – Scotland
Queen Elizabeth House
Sibbald Walk
Edinburgh EH8 8FT (Phone 0131 244 9001 or e-mail Scotland@ico.org.uk)

Please help us ensure the accuracy of your information is updated by informing us of any changes to your email address and other details.