



24<sup>th</sup> September 2020

## **Tollcross Housing Association Limited**

### **Transparency Statement - How we use your Personal Data**

This statement explains what personal data we collect, 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.

#### **Who are we?**

Tollcross Housing Association Limited is a Scottish Charity (Scottish Charity Number SC040876), a registered social landlord with the Scottish Housing Regulator (registration number 197) and a registered property factor (number PF000261). Our office is at 868 Tollcross Road, Glasgow, G32 8PF. We take the issue of security and data protection very seriously and strictly adhere to the regulations published in the Data Protection Act 2018 and the General Data Protection Regulation (EU) 2016/679 (GDPR), together with any domestic laws subsequently enacted.

We are registered as a Data Controller with the Office of the Information Commissioner (ICO) under registration number Z6608328 and we are the data controller of any personal data that you provide to us.

Any questions relating to this statement and our data protection practices should be sent to our Corporate Services Director in the first instance; email:

[anne.fitzsimons@tollcross-ha.org.uk](mailto:anne.fitzsimons@tollcross-ha.org.uk)

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

We collect information including personal data about you and you provide information including personal data to us so that we can provide information and services to you:

- When you visit or use our website;
- When you visit any of our offices or premises;
- When you apply for housing;
- When you become a tenant;
- When you request services, repairs, maintenance and adaptations or when you are in receipt of services, repairs, maintenance and adaptations;
- When you enter into a factoring or shared owner agreement with us;
- When you supply services to us or apply/tender to supply services to us (contracted or otherwise);
- When you apply for a job with us;
- When you provide data as a referee for a job applicant;
- When you apply to become a member;
- When you join our participation groups;
- When you use our online services including to report any tenancy or factoring related issues, make a complaint or otherwise;
- When you arrange to make payments to us or we make payments to you;
- From CCTV images captured by our CCTV cameras;
- From voice recordings when you call us on the telephone or we call you;
- When you otherwise provide us with your personal details.

The information we collect from you or receive from third parties includes but is not necessarily limited to:

- Name;
- Address;
- Telephone number;
- E-mail address;
- National Insurance Number;
- Demographic information – ethnicity, race, age, date of birth, nationality;
- Share membership number;
- Financial information (bank details, payment card numbers, ...
- Next of Kin/emergency contact details/Household members;
- Employment details and employment references
- Medical/Health/Disability information
- Membership details;
- Benefits/Universal Credit information from DWP/Housing Benefit Department;
- Passport number;
- Driving licence number;
- Complaints or other communications regarding behaviour or other alleged breaches of the terms of your contract with us including information obtained from Police Scotland, 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;

### **Why we need this information about you and the legal bases for processing**

We need your information and will use your personal data fairly and lawfully in order to provide information and services to you. For example:

- To enable us to enter into 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 respond to your repair request, housing application and any 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;
- 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;
- to contact you for your views on our products and services;
- because we may have a legal obligation to do so;
- because it is in the public interest to do so or because it is in our legitimate interest to do so;
- so we can refer you to organisations that can offer you benefits and financial advice and support

## 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 trusted 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 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 or relevant party;
- If we are investigating a complaint, information may be disclosed to Police Scotland, Local Authority 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 the Local Authority);
- If we are investigating payments made or otherwise, your information may be disclosed to payment processors, Local Authority and the Department for Work & Pensions;
- 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 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;
- 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;
- Other trusted 3rd parties in order to provide our services to you.

Unless we have a lawful basis for disclosure, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.

## Security of your personal data

When we collect or you give us your personal data we take steps to make sure that it is kept secure and safe. We store your data securely in both electronic and paper format.

Further information concerning security and storage of personal data can be found in our Data Protection Policy which is available at our office or by emailing:

[info@tollcross-ha.org.uk](mailto:info@tollcross-ha.org.uk)

## 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 Data Retention Policy and schedule is available on request.

## Your Rights

You have rights in relation to your personal data and can ask:

- To access information about the personal data we are processing and to obtain a copy of it;
- To change incorrect or incomplete data;
- To erase or stop processing your data (in certain circumstances);
- To stop sending you marketing messages; and
- To object to certain processing activities.

If you would like to exercise any of your rights, please contact our Corporate Services Director in the first instance at:

Tollcross Housing Association  
868 Tollcross Road  
Glasgow  
G32 8PF

Telephone 0141 763 2855  
E-mail: [anne.fitzsimons@tollcross-ha.org.uk](mailto:anne.fitzsimons@tollcross-ha.org.uk)

Alternatively, our Data Protection Officer (DPO) is RGDP LLP who may be contacted at:

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

Telephone 0131 222 3239  
Email: [info@rgdp.co.uk](mailto:info@rgdp.co.uk).

If you remain unsatisfied about the way your personal data is processed by us you also have the right to complain to the Information Commissioner's Office which may be contacted at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Website: [www.ico.org.uk](http://www.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.