



GDPR Fair Processing Notice

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Please ask a member of staff if you would like a version in a different format.

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?

Garrion Peoples Housing Co-operative Ltd is a registered Scottish Charity (Scottish Charity Number SC045936), a registered society under the Co-operative and Community Benefit Societies Act 2014 with Registered Number 2337R(S) and having their Registered Office at CenterPoint, 70 Smith Avenue, Wishaw, ML2 0LD takes the issue of security and data protection very seriously and strictly adheres to guidelines published in the Data Protection Act of 1998 and the General Data Protection Regulation (EU) 2016/679 which is applicable from the 25th May 2018, together with any domestic laws subsequently enacted.

We are notified as a Data Controller with the Office of the Information Commissioner under registration number Z5892087 and we are the data controller of any personal data that you provide to us.

Our Data Protection Officer is Paul Murphy. Any questions relating to this notice and our privacy practices should be sent to the Data Protection Officer.

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, enter in to a factoring agreement or commercial lease with ourselves howsoever arising or otherwise provide us with your personal details;
- When you apply to become a member;
- When you become a volunteer;
- From your use of our online services, whether to report any tenancy/ factor 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 the following information about you and/or members of your household (where appropriate):

- Personal Details: name, address and date of birth;
- Contact Details: home phone number, mobile phone number, email address, previous address or forwarding address;
- Further Details: National Insurance number, gender, ethnicity, disability and marital status;
- Next of Kin;
- Household Composition: name and date of birth of household members, details of existing accommodation arrangements and individual(s) who may be seeking accommodation with an applicant;
- Details of any of your previous addresses in past five years;
- Any medical information which may be necessary for the management of your tenancy or to adequately process your application and any support provisions;
- Tenancy Details: start and end date of tenancy you may have had with GPHC and records of any rent payments, under/over payments or other tenancy related debt/credit;
- Payment Details: your bank account details, any third party payment details;
- Repairs: repairs requested, access details and completion dates;
- Purchase/Change of Ownership: mortgage provider, solicitor details;
- IP Address: when you access our website;
- Images: event photography, videos including sound, CCTV images

We may also record factual information whenever you contact us or use our services, as well as information about other action we take, so we have a record of what happened.

We will not collect any personal data for you that we do not need.

We may also receive the following information from third parties:

- Benefits information, including awards of Housing Benefit/ Universal Credit;
- Payments made by you to us; from third party payment sources such as Allpay;
- 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;
- Physical or mental health information from public authorities.

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

We need to collect your personal data in order to allow us to effectively provide the housing or other services which you have requested from us.

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 (your tenancy agreement);
- Sign up new tenants;
- Enable us to supply you with the services and information which you have requested;
- Enable us to respond to your repair request, housing application and complaints made;
- Manage payments from you to allow us to effectively manage your accounts;
- Analyse the information we collect so that we can administer, support and improve and develop our business and the services we offer;
- Contact you in order to send you details of any changes to our or supplies which may affect you;
- Assist in the recovery of debts or if necessary court or other legal actions;
- Meet our legislative and regulatory obligations including providing our annual returns and other information to regulatory bodies;
- Contact you on views on our products and services including satisfaction surveys and consultations; and
- Assist with other purposes consistent with the proper performance of our operations and business.
- Deliver community projects, activities or events.

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/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, 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 your household is threatened with homelessness your information may be shared between us 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 of 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. 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;

- 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;
- To fulfil our legal and regulatory obligations to bodies such as the Scottish Housing Regulator, The Care Inspectorate, Scottish Social Services Council, Financial Conduct Authority or the Office of the Scottish Charity Regulator.

Transfers outside the UK and Europe

Your information will only be stored within the UK and EU.

Security

When you give us information we take steps to make sure that your personal information is kept secure and safe.

Only GPHC staff and partners and contractors who have signed data sharing agreements and who need to see your personal information will have access to it.

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. In instances where devices are used remotely this will be secure and under strict control at all times in line with section the IT Security Policy which is available on request. 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 office are protected by an alarm system and are monitored by CCTV;
- All GPHC computer systems are within a secure network;
- 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;
- Each authorised user has a private password known only to themselves;
- Regular prompts for password amendments.

The following additional measures are taken to ensure the security of any Data:-

- Network username;
- Network password;
- Application username;
- Application password;
- Application permissions and access restricted to those who require it.

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 the following minimum periods:

| Type of record | General retention time |
|---|---------------------------------------|
| Membership records | 5 years after last contact |
| Governing Body Members Documents | 5 years after cessation of membership |
| Applicants for accommodation | 5 years |
| Housing Benefits Notifications | Duration of Tenancy |
| Tenancy files | Duration of Tenancy |
| Former tenants' files (key info) | 5 years |
| Third Party documents | Duration of Tenancy |
| Records re offenders. Ex-offenders (sex offender register) | Duration of Tenancy |
| Lease documents | 5 years after lease termination |
| ASB case files | 5 years/end of legal action |
| Governing Body meetings/residents' meetings | 1 year |

After which this the relevant information will be destroyed if it is no longer required for the reasons it was obtained.

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;
- Make a request to us to delete what personal data of you we hold; and
- Object to receiving any marketing communications from us.

If you would like to exercise any of your rights above please contact us at enquiries@gphc.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 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.