

Prospect Community Housing Ltd

UK GDPR Fair Processing Notice

Tenants, Sharing Owners and 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 handle your information.

Who are we?

Prospect Community Housing, a Scottish Charity (SC029797), a registered society under the Co-operative and Community Benefit Societies Act 2014 (229OR) and having our Registered Office at 6 Westburn Avenue, Edinburgh, EH14 2TH.

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 of 2018 (the 2018 Act), 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 Z4610401 and we are the data controller of any personal data that you provide to us.

Our Data Protection Officer is Leigh Pettigrew. Any questions relating to this notice and our privacy practices should be sent to information.request@prospectch.org.uk.

How we collect information from you and what information we collect

We collect information about you to enable us to perform our contractual obligations. You, in turn, are under a contractual obligation to provide the data requested from you to enable performance of the contract (i.e. the tenancy agreement you are party to):

- when you apply for housing with us, become a tenant, request services/ repairs, enter into a factoring agreement with ourselves 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/ 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);

Under the terms of the tenancy agreement, you are under a required to provide us with the following information:

- Name;
- Address;
- Telephone number;

- Email address;
- National Insurance Number;
- Emergency Contact Details;
- Date of Birth
- Photograph
- Monitoring information including ethnicity and disability

We 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.

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

The legal basis for processing your data is contractual – to fulfil the terms of our agreement with you, including our tenancy agreement, factoring agreement or shared ownership agreement.

We will use your information:

- To 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 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 to send you details of any changes to our or supplies which may affect you;
- For all other purposes consistent with the proper performance of our operations and business; and
- To contact you for your views on our products and services.

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 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
- External Information Technology Providers who process information on our behalf;
- Auditors carrying out work on behalf of Prospect Community Housing Ltd.

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.

Transfers outside the UK

Your information will only be stored within the UK.

Security

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

We have separate Information Technology policies and procedures in place to protect information that is held electronically, and these are available on request. Our paper records are held in our office and any personal information is stored locked and only available to authorised staff members.

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 duration of our contract with you, and for a period of three years thereafter. Full details of how long we keep your data for is provided in our data retention schedule which is available on request.

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;
- ask us to correct any inaccuracies of fact in your information;
- make a request to us to delete what personal data of your 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 Leigh Pettigrew, information.request@prospectch.org.uk. **You should note that your rights under the UK GDPR and 2018 Act are not absolute and are subject to qualification.**

If you have any complaints about the way your data is processed or handled by us, please contact Leigh Pettigrew, information.request@prospectch.org.uk.

If you remain unsatisfied after your complaint has been processed by us, 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
45 Melville Street, Edinburgh, EH3 7HL
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.