

Prospect Community Housing

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.

About us

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 [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 Z4610401 and we are the data controller of any personal data that you provide to us.

Our Data Protection lead officer is Brendan Fowler, Director. Any questions relating to this notice and our privacy practices should be sent to enquiries@prospectch.org.uk

How we collect information from you and what information we collect

We collect information about you:

- When you become a tenant, request services/ repairs, enter in to a factoring agreement with ourselves or otherwise provide us with your personal details
- 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 collect the following information about you including:

- Name
- Address
- Contact details
- National Insurance Number
- Emergency contacts
- Banking details
- Date of birth
- Photograph
- Monitoring information including ethnicity and disability

We may 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. 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 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)
- 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
- External Information Technology providers who process information on our behalf
- Auditors carrying out work on behalf of Prospect Community Housing

Unless required to do so by law or to fulfil our contract with you, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.

Transfers outside the UK and Europe

Your information may be processed outside of the UK or the European Economic Area (EEA).

Where this happens, we will ensure that there are adequate safeguards in place to protect your information in accordance with this notice, for example that the organisation processing the information is registered with the Privacy Shield.

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
- require us to correct any inaccuracies in your information
- make a request for us to delete what personal data of yours we hold
- object to receiving any marketing communications from us

If you would like to exercise any of your rights above please contact us at **enquiries@prospectch.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
45 Melville Street, Edinburgh, EH3 7HL
Telephone: 0131 244 9001
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.