

Homes for Life Housing Partnership Privacy Policy: GDPR Privacy Notice: General

(How we use your personal information*)

(Note- a separate Fair Processing Notice: Employment covers data processing for employees and applicants for employment)*

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 about you, (which may be held on paper, electronically, or otherwise). 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?

Homes for Life Housing Partnership (“**we**” or “**us**”) are a Scottish Charity (Scottish Charity Number 028542), a Company registered in terms of the Companies Acts with registered number 188299 and having their Registered Office at 57 Market Street, Haddington, East Lothian, EH 41 3JG. 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 Z4790842 and we are the data controller of any personal data that you provide to us.

As a Registered Social Landlord, we are not currently required to appoint a Data Protection Officer with Statutory Responsibilities under the General Data Protection Regulation, and have not opted to appoint one.

Any questions relating to this notice, our Privacy Policy and practices should be directed to our Privacy Administrator- Alison Hume, Corporate Services Officer- tel 01620 829300 or email alison@homesforlife.co.uk, or at our office at 57 Market Street, Haddington, East Lothian, EH41 3JG.

How we collect information from you and what information we collect

We collect information about you:

- when you apply for housing with us- whether for affordable rent or ownership, become a tenant or sharing owner, 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 or director;
- 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:

- name;
- address;
- household details;
- telephone number;
- current and previous accommodation;
- e-mail address;
- National Insurance Number;
- Next of Kin or other emergency contact;
- Relevant personal characteristics such as disability, medical conditions, gender, ethnic group and preferred language
- Employment details;
- Income details, including benefits entitlement; and
- Banking details

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; and
- 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

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
- 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 in order to send you details of any changes to our services or supplies which materially 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/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 but not restricted to 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, including necessary surveys or testing, 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 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
- For reference requests- from landlords or mortgage providers

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.

Transfers outside the UK and Europe

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

Security

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

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 minimum periods outlined in the table at Appendix 7 of our Privacy Policy, after which this will be destroyed if it is no longer required for the reasons it was obtained. Our Privacy Policy is available on our website or from our Registered Office.

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 yours we hold; and
- object to receiving any marketing communications from us.

If you would like to exercise any of these rights please contact our Privacy Administrator - Alison Hume, Corporate Services Officer- tel 01620 829300 or email alison@homesforlife.co.uk, or at our **Registered Office** at 57 Market Street, Haddington, East Lothian, EH41 3JG.

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