



## Appendix 5

### Privacy Notice – General

For website, tenants, visitors, contractors/suppliers and job applicants

This Privacy Notice is for visitors to our website and premises, tenants, contractors/suppliers and job applicants.

It explains what personal data we process, 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.

#### Who are we?

Homes for Life Housing Partnership (HfL) (“we” or “us”) is 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, EH41 3JG.

We take the issue of security and data protection very seriously and strictly adhere to guidelines published in the Data Protection Act of 2018 and the UK General Data Protection Regulation, 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.

Our Data Protection Officer is RGDP LLP who may be contacted at:

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

Telephone: 0131 222 3239 / 07741 738842

Email: [info@rgdp.co.uk](mailto:info@rgdp.co.uk)

Any questions relating to this notice, our Data Protection Policy and data protection practices should be directed to our Data Protection lead at: 01620 829300 or [info@homesforlife.co.uk](mailto:info@homesforlife.co.uk) or our offices at 57 Market Street, Haddington, East Lothian, EH41 3JG.

### 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 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);
- when you are recorded on our voice recording systems
- when you supply services to us
- when you visit our website, offices and estates/properties
- when you apply for a job with us
- when you request or are in receipt of our services

The information we may collect includes but is not limited to:

- 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
- 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

- Reports as to the conduct or condition of your tenancy, including references from previous tenancies, and complaints of anti-social behaviour
- Health related information

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

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

- to enter into 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
- to contact you for your views on our products and services
- to protect your interests and / or in the interest of others
- to meet our legal obligations
- because it is in the public interest or it is in our legitimate interests to do so

### Sharing of Your Information

The information you provide to us will be treated by us as confidential and will be processed 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 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 Authorities)
- 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
- 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

- 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 third parties in order to provide our services to you

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

### International Transfers

Your personal data will only be processed within the UK.

### Security

When you give us information including 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. Where a physical copy of any data is stored it is stored in a locked filing cabinet or drawer. Electronic copies of personal data are stored on our system which is accessed through password entry. Any information transmitted electronically is transmitted securely and password protected where appropriate.

### 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 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
- To object to certain processing activities

If you would like to exercise any of these rights, have any questions or wish to complain about the way we are processing your personal data, please contact our Data Protection lead at: 01620 829300 or [info@homesforlife.co.uk](mailto:info@homesforlife.co.uk) or our offices at 57 Market Street, Haddington, East Lothian, EH41 3JG.

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 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.

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