



GDPR Fair Processing Notice

Customers



How Cloch uses 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?

Cloch Housing Association is a social landlord and factor and runs Inverclyde Care & Repair having their Registered Office at 19 Bogle Street, Greenock, PA15 1ER. 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, Z1221458, and we are the data controller of any personal data that you provide to us.

Our Data Protection Lead Officer is **Liz Bowden**, Corporate Services Manager.

Contact Details:

19 Bogle Street, Greenock PA15 1ER

Telephone **01475 783637**

e-mail: **office@clothhousing.org.uk**.

She will also deal with any questions relating to this notice and our privacy practices.

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 or shared owner, become a client of Care & Repair, request services/ repairs, enter into a factoring agreement with us 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/factoring related issues, repairs, 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);
- during office appointments or visits to your home;
- When you use our website, through the use of Cookies on our website;
- When you enter information on our Web Portal.

We collect the following information about you:

- Your name, address (previous addresses), date of birth, national insurance number, email address, phone number(s), your date of entry, date of termination and rent charge;
- details of other occupants in the property and their relationship to you (name, relationship, DOB);
- Any medical information you have given us to support your application for rehousing;
- Any medical information you have authorised Inverclyde Centre of Independent Living to share with us;
- Your emergency contact name (and relationship to you), address and phone number(s);
- Your employer;
- Your ethnicity status and disability status and gender;
- How much rent you pay and any arrears you might have;
- Details of any claim you might have with Inverclyde Council's Housing Benefit Department and(or) Discretionary Housing Payments;
- Details of any claim you might have for Universal Credit with the Department of Work & Pensions;
- Details of any repairs requested and any access arrangements you have provided regarding this;
- Details of any incident(s) which may have occurred which may pose a risk to our staff;
- Details of any legal action we have taken relating when a condition of your tenancy has been breached;
- Any complaint made by you.

What information we received from third parties:

- Inverclyde Common Housing Register (ICHR): all the personal information you entered on your application;
- Previous landlords; name and address;
- Benefits information, including awards of Housing Benefit, Discretionary Housing Benefit and Universal Credit;
- Homeless referrals are made by Inverclyde Council so we will receive all the personal information that comes with the referral;
- Payments made by you to us in respect of rent, rechargeable repairs, service charges, care and repair fees and membership fees;
- Complaints or other communications regarding behaviour or other alleged breaches of the terms of your Scottish Secure Tenancy (SST)(Short SST, Occupancy Agreement, Lease, Shared Ownership Agreement) with us, including information obtained from Police Scotland and Inverclyde Council's Problem Solving Unit and Anti-Social Behaviour Team and other residents;
- Reports as to the conduct or condition of your tenancy, including references from previous tenancies, and complaints of anti-social behaviour and any arrears balances;
- Inverclyde's Centre of Independent Living will share information about your medical conditions and housing adaptation needs to allow us to assist you in having adaptations carried out in your home.

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 set out in your agreement (SST, Short SST, Occupancy Agreement, Lease, Shared Ownership Agreement);
- 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 (including assistance with benefit applications and Universal Credit and Housing Benefit applications);
- 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 and send you details of any changes to our or services which might 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 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 enter into a joint venture with or merge with another business entity, your information may be disclosed to our new business partners or owners;
- If we instruct adaptations, repair or maintenance works, your information may be disclosed to contractors we use;
- If we are investigating a complaint, information may be disclosed to Police Scotland, Inverclyde Council (ASSIST Team and Problem Solving Unit) departments, Scottish Fire & Rescue Service, Cloch's Solicitor, SPSO, 1st tier tribunal and others involved in any complaint, whether investigating the complaint or otherwise;
- Software providers and IT Technical services, including Housing Online, web portal provider, IT Support Contractor, Telecoms Company and database software providers;
- If we are updating tenancy details, your information may be disclosed to third parties (such as utility companies and Inverclyde Council);
- If we are investigating payments made or otherwise, your information may be disclosed to payment processors (OTHA), Inverclyde Council and the Department of Work & Pensions, Allpay, Worldpay and Bank of Scotland;
- 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;
- When we pass information to our Housing Online Web Portal for you to access when you log in.

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

We do not store or transfer data out with the UK or EEA.

Security

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

Our computer systems and network storage systems are all password protected, they are managed and monitored by specialist security software. Internal security permissions are used to manage access to files so only the relevant staff required to use the data have access to it.

We also have the ability to use mobile devices such as laptops and tablets. These devices are also managed centrally and have the relevant methods of security installed.

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. Our full retention schedule is available by contacting our Data Protection Lead Officer, Liz Bowden. Contact Details below.

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 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 the Data Protection Lead Officer at the Contact Details below.

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.



If you would like more information on our Privacy Policy and Fair Processing Notice, please contact:

Liz Bowden, Corporate Services Manager (Data Protection Lead Officer)

Cloch Housing Association

19 Bogle Street, Greenock PA15 1ER

Telephone: 01475 783637 • e-mail: office@clothhousing.org.uk.

www.clochhousing.org.uk