



## **Cathcart & District Housing Association**

# **TENANT AND APPLICANT PRIVACY NOTICE**

### **(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 process your information.

## **Who are we?**

Cathcart & District Housing Association registered as:

A Scottish Charity (Scottish Charity Number SC037255);  
A registered society under the Co-operative and Community Benefit Societies Act 2014 and the;  
Financial Services Agency with Registered Number 1821 RS;  
A registered Property Factor, Registered Number 000230;

and having our Registered Office at:

### **3-5 Rhannan Road, Cathcart, Glasgow, G44 3AZ**

Cathcart & District Housing Association takes the issue of security and Data Protection very seriously, including compliance with the UK General Data Protection Regulation, the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations.

We are notified as a Data Controller with the Office of the Information Commissioner (ICO) under registration number ZA165233 and we are the data controller of any personal data that we process in relation to you.

### **If you do not wish to provide your personal data**

You have obligations under your contract/potential contract with us to provide us with the necessary data. If you do not provide this information, this will hinder the Association's ability to enter into or maintain a contract with you.

### **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, 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);

We may collect the following information about you:

- Personal details: name, addresses, date of birth and other household members
- Contact details: home phone number, address, mobile phone number and email address

- Further details: NI number, gender, ethnicity, disability, medical details, marital status, signature, unacceptable behaviour warnings
- Household composition: details of existing accommodation arrangements and family
- Members seeking accommodation with the applicant
- Tenancy Details: start and end dates, rent paid, under/over payments
- Payment details: bank account details, third party payment details
- Repairs: repairs requested, access details, completion dates
- Sensor data: temperature, motion, light, humidity and air pressure
- Pseudonymised data: CDHA customer account numbers, rent/factors reference number,
- Share membership number
- Purchase details: solicitors details
- Employment: benefit/council tax status and payments, employment history, education history, tax code, trade union membership
- Employment application details, asylum status, criminal record declaration
- Location: IP address when you access our website
- Images: event photographs and CCTV images
- Voice recording on our voicemail and office telephones.

We may also record factual information whenever you contact us or use our services, as well as information about other actions we take, so that we have an accurate record of what happened.

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, Social Services and/or Local Authorities;
- Reports as to the conduct or condition of your tenancy, including references from previous tenancies, and complaints of anti-social behaviour
- Information relating to any homeless application you may have submitted, supplied by the relevant local council
- Contractors and suppliers who have undertaken works on our behalf
- Legal advisors
- Health professionals
- Local Authorities
- Charities
- MPs, MSPs and councillors
- Other registered social landlords
- Utility companies
- Household members

## **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;
- Enable us to supply you with the services and information that you have requested;
- Enable us to respond to your repair request, housing application and complaints made;
- Analyse the information we collect so that we can administer, support, improve and develop our business and the services we offer;
- Contact you in order to send you details of any changes to our or suppliers that may affect you;
- Progress all other purposes consistent with the proper performance of our operations and business; and
- Contact you for your views on our products and services.

## **Who might my data be shared with, or seen by?**

We may disclose your personal data to any of our employees, officers, contractors, insurers, professional advisors, agents, debt collection agencies, suppliers or subcontractors, government agencies and regulators and healthcare providers insofar as reasonably necessary, and in accordance with data protection legislation.

We may also disclose your personal data:

- with your consent;
- to the extent that we are required to do so by law;
  - to complete a regulatory return in relation to the Management Committee
  - to protect the rights, property and safety of us, our customers, users of our websites and other persons;
  - in connection with any ongoing or prospective legal proceedings;
  - If we are investigating a complaint, information may be disclosed to solicitors, independent investigators such as auditors, the Scottish Housing Regulator and other regulatory bodies involved in any complaint, whether investigating the complaint or otherwise;
  - to the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling;
  - to another organisation if we enter into a joint venture or merge with another organisations.

## **What are the legal bases for us processing your personal data?**

We will only process your personal data on one or more of the following legal bases:

- contract
- consent
- our legitimate interests (including CCTV recordings, audio recordings, newsletters, smart thermostats, and void property management))
- vital interests
- the performance of a task carried out in the public interest and/or with official authority
- legal obligation.

### **Processing special category personal data**

Special categories of personal data means information about your racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; health; sex life or sexual orientation; criminal convictions, offences or alleged offences; genetic data; or biometric data for the purposes of uniquely identifying you.

The "special categories" of sensitive personal information referred to above require higher levels of protection. We need to meet additional legal requirements for collecting, storing and using this type of personal information.

### **Transfers outside the UK**

Your information will only be stored within the UK except where international transfers are authorised by law.

### **How do we keep your data safe?**

When you give us information, we take steps to make sure that your personal information is kept secure and safe. All data is held in accordance with Cathcart & District Housing Association's data protection policies and procedures.

### **How long we will keep your personal 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, or best practice, and in accordance with our Data Retention Policy and Schedule.

### **Your Rights**

You have the right at any time to request to exercise your data subjects' rights in relation to the following:

- the right to be informed
- the right to access
- the right to rectification
- the right to object to processing
- rights in relation to automated decision making and profiling

- the right to be forgotten
- the right to data portability
- the rights to restrict processing

## **Queries and Complaints**

Any questions relating to this notice and our privacy practices should be directed, in the first instance, to our Corporate Services Officer (emma@cathcartha.co.uk) or by telephoning 0141 633 2779.

Our Data Protection Officer is provided by RGDP LLP and can be contacted either via 0131 222 3239 or [info@rgdp.co.uk](mailto:info@rgdp.co.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:

Telephone: 0303 123 1113

Online: [Make a complaint | ICO](#)

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.