

Who are we?

Dalmuir Park Housing Association (DPHA) is a Scottish Charity (Scottish Charity Number SC033471), a registered society under the Co-operative and Community Benefit Societies Act 2014 with Registered Number 1917 R(S) and have our Registered Office at Beardmore House 631 Dumbarton Road, Dalmuir, Clydebank. G81 4EU.

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 Z5642475 and we are the data controller of any personal data that you provide to us.

Any questions relating to this notice and our privacy practices should be sent to Corporate Services Officer at admin@dpha.org.uk

How we collect information from you and what information we collect

The reason we collect your information is mainly to comply with our legal duties as registered social landlord and to meet the regulatory standards as directed by the Scottish Housing Regulator. We also enter into contractual relationships with third parties whom you ask to process personal data on your behalf for various reasons (e.g. West Dunbartonshire Council), these "Data Processors" are also required to comply with GDPR.

We collect information about you when you:

- apply for housing with us;
- become a tenant and sign a tenancy agreement;
- request services/repairs;
- enter in to a factoring agreement with ourselves;
- apply to become a shareholder;
- use our online services;
- report any tenancy/ factor related issues;
- make a complaint or otherwise;
- receive care services from us;
- your child received care services from us;
- arrange to make payment to us.

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 Corporate Services Officer at admin@dpha.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.



Dalmuir Park
Housing Association

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Beardmore House, 631 Dumbarton Road, Dalmuir, Clydebank G81 4EU

www.dpha.org • Tel 0141 952 2447 • Fax 0141 951 4423

Dalmuir Park is registered charity no. SCO 3347

When you have finished with this newsletter please recycle it.



Dalmuir Park
Housing Association

GDPR Fair Processing Notice



How we use your personal information

This notice explains what information we collect, when we collect it and how we use this. During 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.

We collect the following information about you:

- Personal details: name, date of birth, next of kin details, medical details, marital status, signature, immigration / residential status;
- Contact details: address, telephone numbers, e-mail address;
- Equality details: ethnicity, disability details, religious belief, gender identification, sexual orientation;
- Household details: housing applicant's current accommodation and all family members to be re-housed;
- Tenancy details: start and end dates, rent paid, under/over payments, warnings about unacceptable behaviour or vulnerable tenant, housing history, economic status;
- Payment details: name of bank, account number, sort code, third party payment details;
- Repairs requested: access details, completion dates, satisfaction;
- Personally Identifiable: rent/factoring account number, All-pay card reference number, shareholder membership number;
- Purchase/Buy back details: mortgage provider, solicitor details;
- Employment/Benefits: benefits/council tax status and payments, National Insurance number, occupation, employer name and address and contact number, income details, grants;
- Complaints: date received, date responded, complaint details, outcome, upheld or not;
- Images: event photographs, CCTV images;
- Health Care Details: vulnerabilities – e.g. sight, hearing impairments, drug/alcohol dependency issues, third-party authority and information (name, address, nature of relationship to tenant) details of support being received or required from external agencies (name of support worker, name of external agency).

We receive the following information from third parties:

- Benefits information, including awards of housing benefit/ universal credit from the job centre or DWP or money advice agencies;
- 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;
- Social services, mental health agencies, GP's, hospitals or support workers.

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 or supplies which may 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.

Sharing of Your Information

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 merged with another business entity
- your information may be disclosed to our new business partners or owners;
- 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);
- If we are investigating payments made or otherwise, your information may be disclosed to payment processors, local authority and the DWP;
- 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.

Transfers outside the UK and Europe

The information you provide to us will be treated by us as confidential and will be processed only by our employees within the UK. Your information will also only be stored within the UK.

Security

When you give us information we take steps to make sure that your personal information is kept secure and safe. Security measure we have in place are:

- Our premises are security alarmed and fob accessed;
- Our IT systems are actively remotely monitored by our IT support provider
- We only allow staff to access sensitive data on a 'need-to-know' basis or /and some staff have limited access to sensitive data;
- Our staff have the necessary qualifications and integrity to access data and are carefully supervised;
- All of our staff are trained regularly on data protection and some key staff have had more in-depth training;
- Paper data is stored in locked cabinets and is disposed of in secure, locked consoles which are emptied by a confidential waste company. All electronic data and media is stored on a secure server and regularly audited to ensure that no excessive data is being retained. Automatic archiving is also set up on emails and regular archiving is carried out on all data following our retention schedules.
- We have anti-fraud policies aimed at preventing frauds and we have clear desks; policy and ensure we practice appropriate telephone call handling;
- We securely process electronic and paper data are transmitted/ moved from place to place by using encrypted USB sticks or ensure documents are password protected.



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 according to the following retention periods: <https://www.housing.org.uk/resource-library/browse/document-retention-for-housing-associations/> All data will be destroyed if it is no longer required for the reasons it was obtained. Our full retention schedule is attached to our Privacy Policy.