



# GDPR Fair Processing Notice

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?**

Southside Housing Association (Reg. No. HCB186) is a Scottish Charity (Scottish Charity Number SCO36009), a registered society under the Co-operative and Community Benefit Societies Act 2014 with Registered Number 1694r(s) and having its Registered Office at 135 Fifty Pitches Road, Glasgow G51 4EB takes the issue of security and data protection very seriously and strictly adheres 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 Z6936072 and we are the data controller of any personal data that you provide to us.

Our Data Protection Officer is Desmond Phee (Corporate Compliance Officer).

Any questions relating to this notice and our privacy practices should be sent to the Data Protection Officer.

## **How we collect information from you and what information we collect**

when you apply for housing with us, become a tenant, request services/ repairs, enter in to 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, apply for a vacancy, 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 personal information about you:

- Your personal details: name, address, date of birth.
- Your contact details: home telephone number, mobile phone number and email address;
- Other details: including information about your gender, ethnicity, disability and marital status.
- Any Medical information which may be necessary for the management of your tenancy or to adequately process your application for housing.
- National Insurance Number;
- Next of Kin;
- Tenancy details: start and end dates for any tenancy you may have had with SHA and records of any rent or service payments you have made
- Information about the composition of your Household including details of existing accommodation arrangements and individual(s) who may seeking accommodation with an applicant.
- Details of any of your previous addresses in past five years.
- Payment details: your bank account details, any third party payment details.
- Details of repairs requests that you have made including time and dates for access and when repairs have been completed.
- Details relating to purchase or ‘buy back’ of a property: including mortgage provider and solicitor details.
- Images: this may include photographs from events or images captured by CCTV
- Your IP address: when you access our website.

We may also record other information when you contact us or use any of the services that we provide. We may also record information about action we take e.g. in relation to anti-social behaviour so that we have an accurate record of what has happened.

Southside Housing Association will not collect any personal data for you that we do not need.

We also may receive the following information from third parties:

- Benefits information, including awards of Housing Benefit / Universal Credit
- Payments made by you to us; from third party payment sources such as AllPay.

- 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.

**Why we need this information about you and how it will be used**

We need to collect your personal data in order to allow us to effectively provide the housing or other services which you have requested from us.

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.

Process applications for housing.

Sign up new tenants.

Ensure our rents are affordable and that your views have been taken into account

Respond effectively to our customers enquiries.

Provide a high standard repairs and maintenance service.

Deliver a high quality and value for money factoring service for homeowners.

Manage payments from you and allow us to effectively manage your accounts.

Assist in the recovery of debts or if necessary court or other legal actions

Meet our legislative and regulatory obligations including providing our annual returns and other information to regulatory bodies.

Contact you in order to send you details of any changes to our suppliers which may affect you.

contact you for your views on our products and services including satisfaction surveys and consultations.

We also need and use your information for all other purposes consistent with the proper performance of our operations and business.

## **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 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, Glasgow City Council, Scottish Fire & Rescue Service, Community Safety Glasgow 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 Glasgow City Council);
- If your household is threatened with homelessness your information may be shared between us and Glasgow City Health and Social Care Partnership.
- If we are investigating payments made or otherwise, your information may be disclosed to payment processors, Glasgow City Council 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;
- If we are pursuing debts associated with a tenancy or a former tenancy we may share your basic information with a third party agency to assist in the recovery of those debts;
- If we are making an insurance claim following an incident we may share your information with our insurers.
- If we are being audited then we may share your information with our auditors.
- Where there is a legal action that involves you such as action to recover a tenancy your information may be shared with a solicitor to assist in the legal process.
- To fulfil our legal and regulatory obligations to bodies such as the Scottish Housing Regulator, The Care Inspectorate, Scottish Social Services Council, Financial Conduct Authority or the Office of the Scottish Charity Regulator.

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:

Where information is transferred outside the UK or EEA we will ensure that there are adequate safeguards in place to protect your information in accordance with this notice.

## **Security**

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

Only SHA staff and partners and contractors who have signed data sharing agreements and who need to see your personal information will have access to it.

We will not usually retain your payment details unless you make payments to us using Direct Debit.

Our computer systems are located in our main office, however our staff may occasionally use laptops, tablet or other devices offsite. In instances where devices are used remotely this will be secure and under strict control at all times in line with section 6 of SHA's IT Policy which is available on request. Additionally we have the following controls in place to ensure the security of your personal information

- All paper based records are securely locked in storage cupboards when not actively being used.
- Our offices are protected by an alarm system, a security company and are monitored by CCTV.
- All SHA computer servers are within a secure network.
- All electronic communication takes place within this secure environment.

The unauthorised use of IT systems is prevented by:

- User ID
- Password assignment
- Lock screen with password activation
- Each authorised user has a private password known only to themselves.
- Regular prompts for password amendments

The following additional measures are taken to ensure the security of any Data:

- Network username
- Network password
- Application username
- Application password
- Application permissions and access restricted to those who require it.

### **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 periods set out in our Data Retention Periods Guidelines, after which this will be destroyed if it is no longer required for the reasons it was obtained.

Our full retention schedule is available on request or can be viewed on our website.

### **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 us at

[enquiries@southside-ha.co.uk](mailto:enquiries@southside-ha.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:

The Information Commissioner's Office – Scotland  
45 Melville Street, Edinburgh, EH3 7HL

Telephone: 0131 244 9001

Email: [Scotland@ico.org.uk](mailto: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.





# Conclusion

Thank you for your attention

Southside housing Association

T: 0141 422 1112

F: 0141 424 3327

E: [enquiries@southside-ha.co.uk](mailto:enquiries@southside-ha.co.uk)

A: Southside House, 135 Fifty Pitches Road, G51 4EB