

Trafalgar Housing Association Limited

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 handle your information.

Who are we?

We are **Trafalgar Housing Association Limited**, a Scottish Charity (Scottish Charity Number SC038597), a registered society under the Co-operative and Community Benefit Societies Act 2014 with Registered Number 2316RS and having their Registered Office at 430A Dumbarton Road, Clydebank, G81 4DX (“**we**” or “**us**”) 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 General Data Protection Regulation (EU) 2016/679, together with any domestic laws subsequently enacted.

We are registered as a Data Controller with the Office of the Information Commissioner under registration number Z4718035 and we are the data controller of any personal data that you provide to us.

Any questions relating to this notice and our data protection practices should be sent to the Director

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, become a tenant, request services/ repairs, enter into a factoring agreement with ourselves howsoever arising or otherwise provide us with your personal details
- you apply to become a member;
- you use our online services, whether to report any tenancy or factoring related issues, make a complaint or otherwise;
- you arrange to make payment to us (such as bank details, payment card numbers, employment details, benefit entitlement and any other income and expenditure related information);
- your image is captured by our CCTV cameras
- you supply services to us
- you visit our website, offices and estates/properties
- you apply for a job with us
- you request or are in receipt of our services

The information we collect includes, but is not necessarily limited to:

- name;
- address;
- telephone number;
- e-mail address;
- National Insurance Number;
- Demographic information – ethnicity, race, age, date of birth, nationality;
- Share membership number;
- Payment card reference;
- Next of Kin;
- Household members;
- Bank Account details;
- Payment Card Numbers;
- Employment details, taxpayer identification numbers, tax reference codes;
- Medical Information to process an application/transfer application/undertake sheltered duties/process medical adaptation requests;
- Membership details;
- Hearing impairments;
- Health & safety information to process insurance claims;
- Disability;
- Benefits information from DWP/Housing Benefit Department;
- Passport or driving licence numbers;

We also receive information about you from third parties including:

- Benefits information, including awards of Housing Benefit/ Universal Credit and any overpayments requests
- 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, Local Authorities or other housing providers;
- 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 enable us to enter a contract with you;
- 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 services which may affect you;
- for all other purposes consistent with the proper performance of our operations and business, including newsletters, website and our annual report;
- to protect your interests and / or the interest of others;
- to meet our legal obligations; to contact you for your views on our products and services.
- because we may have a legal obligation to do so or it is in the public interest or it is in our legitimate interest 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/EEA.

We may disclose your information to other trusted 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 Authorities);
- if we are investigating payments made or otherwise, your information may be disclosed to payment processors, Local Authority and the Department for 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;
- 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;
- if you wish to access our Welfare Rights service;
- 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 lawful basis for disclosure, 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 will only process your information within the UK and EEA.

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.

Further information regarding security and storage of data can be found in our Data Protection Policy available at our office or by emailing admin@trafalgarha.co.uk

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; and
- To object to certain processing activities.
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If you would like to exercise any of your rights, have any questions or wish to complain about the way we are processing your personal data, please contact our Director Paul McShane by contacting our office or by emailing admin@trafalgarha.co.uk

Alternatively, 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 / 07741738842

Email: info@rgdp.co.uk

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. The Information Commissioner's Office may be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Website: 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.