



## **Hawthorn Housing Co-operative**

# **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 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?**

Hawthorn Housing Co-operative is a registered society under the Co-operative and Community Benefit Societies Act 2014 with Registered Number 2195 R (S), and having their Registered Office at 23A Finlas Street Glasgow G22 5DB ("we" or "us") take the issue of security and data protection very seriously and strictly adhere to guidelines published in the UK GDPR and Data Protection Act of 2018 (the 2018 Act), together with any domestic laws subsequently enacted.

We are registered as a Data Controller with the Office of the Information Commissioner (ICO) under registration number Z7872214 and we are the data controller of any personal data that you provide to us.

Our Data Protection Officer (DPO) is Ceara Robertson, Corporate Services Officer. Any questions relating to this notice and our privacy practices should be sent to Ceara Robertson, DPO, at [foi@hawhousing.co.uk](mailto:foi@hawhousing.co.uk).

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

We collect information about you to enable us to perform our contractual obligations. You, in turn, are under a contractual obligation to provide the data requested from you to enable performance of the contract (i.e. the tenancy agreement you are party to):

- when you apply for housing with us, become a tenant, request services/ repairs, 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 related issues, make a complaint, apply for housing 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).

Under the terms of the tenancy agreement, you are required to provide us with the following information:

- Personal data and contact details for you and your household (We collect name(s), address, date of birth(s), gender, national insurance numbers(s), relationship status, pregnancy status, signature and contact details including telephone numbers and e-mail address);
- Verification documentation (proof of identity, proof of your current address and proof that your children live with you permanently (if applicable));
- Details of your current housing situation and where you and any joint applicant have lived for the last five years including the name and address of the landlord and the reason for leaving;
- Financial information (details of any current or former rent or mortgage arrears or rechargeable repairs);
- Health, disability or impairments (Conditions or impairments of any household member which make your current accommodation unsuitable, including information on any adaptations or equipment that you currently use);
- If you give or receive support to someone or if you have been threatened with violence or are being harassed;
- If you or anyone in your household has had action taken against them for antisocial behaviour, or if anyone in your household is required to register with the police, or is on the Sex Offenders Register;
- Next of Kin/ Emergency Contact Details;
- Equalities monitoring information (optional);
- Community volunteering information;
- If you are related to a management committee member or employee of the Co-operative;
- Health information relevant to application or tenancy;
- Employment details;
- Immigration status;
- Home office reference number if applicable;
- Tenancy details: start and end dates, rent paid, under/overpayments;
- Payment details: bank account details, 3<sup>rd</sup> party payment details;
- Images: event photographs, CCTV images

We may also record factual information whenever you contact us or use our service, as well as information about other action we take, so we have a record of what happened.

We 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;
- 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 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. This includes:

- Process and manage housing applications;
- Signing up new tenants to suitable properties;
- Carry out duties highlighted in contract as landlord;
- 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 suppliers which may affect you;
- Meeting our legal obligations including information we have to provide to regulators and statutory authorities;
- Adhering to statutory regulation and providing yearly returns and statistics;
- Perform or assist in debt recovery or court actions;
- Facilitate any necessary legal proceedings;
- Managing payments and for accounting purposes;
- Issue satisfaction surveys, newsletters, annual reports and service information;
- For all other purposes consistent with the proper performance of our operations and business; and
- To contact you for your views on our services.

### **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. 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 the Local Authority);

- 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 service, your information may be disclosed to third parties assisting in the compilation and analysis of the survey results;
- Sharing in connection with legal proceedings;
- Sharing with statutory bodies governing finance and housing industries, for auditing and inspection purposes;
- Sharing in relation to the physical or mental health of an individual, where disclosure is required to protect them or others from serious harm.

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**

All personal data we process is processed by our staff in the UK. We sometimes need to share personal information with other organisations, however where this is necessary, we are required to comply with all aspects of the GDPR. Even when this is required, we only share data within the European Union (EU). We do not give anyone else access to your information in return for payment, for their marketing or commercial purposes.

### **Security**

When you give us information we take steps to make sure that your personal information is kept secure and safe. **Please see our Privacy Policy for further information.**

### **Power of Attorney**

If you wish anyone to deal with your affairs on your behalf please find specific consent form for this on our website or request this from the office. This allows you to request a named person to discuss specific or all of your personal data with the Co-operative as required. We will not share your personal information with anyone who claims to represent you unless we are satisfied that you have appointed them or they act in some recognised official capacity. There may be a delay to us dealing with requests whilst we confirm the caller's identity, or check that we have your approval to deal with them.

### **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 minimum period and this information can be found in our Full Retention Schedule after which the information will be destroyed if it is no longer required for the reasons it was obtained. Our Full Retention Schedule is available from our office at 23A Finlas Street Glasgow G22 5DB.

### **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;
- ask us to correct any inaccuracies of fact in your information;
- request that we restrict your data processing;
- data portability;
- rights related to automated decision making including profiling;
- make a request to us to delete what personal data of yours 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 **foi@hawhousing.co.uk**. **You should note that your rights under the UK GDPR and 2018 Act are not absolute and are subject to qualification.**

If you have any complaints about the way your data is processed or handled by us, please contact Ceara Robertson, DPO, at foi@hawhousing.co.uk.

If you remain unsatisfied after your complaint has been processed by us, 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:

Scottish Information Commissioner  
Kinburn Castle  
Doubledykes Road  
St Andrews  
Fife  
KY16 9DS  
Telephone: 01334 464610  
Email: enquiries@foi.scot

**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.**