



How we use your personal information

This Privacy Notice explains what information we collect, when we collect it, and the reasons why we will hold and use your personal data, and your rights under current data protection law. In our dealings with you, we will handle personal data (which may be held on paper or electronically) about you. We recognise the need to treat it in an appropriate and lawful manner. We are committed to being transparent about how we collect and use your data, and to meeting our data protection obligations with you. This notice is to make you aware of how we will do this.

Ayrshire Housing takes data security very seriously. We adhere to the guidelines published in the retained EU law version of the General Data Protection Regulation ((EU) 2016/679) (UK GDPR) and the Data Protection Act 2018 (DPA 2018) together with any future legislation and regulations.

We are registered as a data controller under registration number **Z7777398** with the Information Commissioner's Office. This covers any personal data that you provide us with.

Data Protection Officer

We have appointed a Data Protection Officer. Our Data Protection Officer is the Head of Performance and Quality.

Any questions relating to this notice and our privacy practices should be sent to the Head of Performance and Quality at Ayrshire Housing, 119 Main Street, Ayr, KA8 8BX or info@ayrshirehousing.org.uk.

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 repairs and other services including medical adaptations, enter into a factoring agreement with ourselves or otherwise provide us with your personal details.
- When you apply to become a member of the association.
- When you apply to become a member of our Board (for more information on this, please see our Company Profile which is available on our website).
- From your use of our online services, for example to apply for or exchange housing, report any tenancy or factoring issue, make a complaint.
- From use of our website (www.ayrshirehousing.org.uk).
- From your arrangements to make payment to us.
- When you attend one of our events.
- From CCTV on our premises (for more information on this, please see our CCTV Policy which is available on our website).

What personal information do we collect?

We may collect the following information about you:

- Name.
- Address.
- Telephone number.
- E-mail address.
- National Insurance Number.
- Details of ethnicity, medical conditions and disability.
- Medical and other information as required by public health or health and safety guidance and policies.
- Next of kin.
- Details of previous experience, if you are applying to become a member of our Board (for more information on this please see our Company Profile which can be accessed through the 'About Us' page on our website).
- Payment information (such as bank details, payment card numbers, employment details, benefit entitlement and any other income and expenditure related information).
- Photographs and video footage of you for the association's promotional purposes including for use on the association's website or social media channels, as appropriate.
- Your IP address when accessing our website and online services.

We may receive the following information from third parties:

- Benefits information, including awards of Housing Benefit and 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.

Attendance at Ayrshire Housing Events

At some events we run, there may be a photographer and/or videographer present and the images they provide may be used by us for the purposes of promoting the association's activities. This might include use in printed and online marketing, social media and press releases. If you would prefer us not to use your image, please contact the event organiser or speak to one of our staff on site at the event.

The data we hold on you will be stored securely in accordance with our Privacy Policy, which includes provision for retention periods.

Processing Special Category Personal Data

Special categories of information 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.

We may collect and process special category personal data in the following circumstances:

- Where we need to carry out our legal obligations (such as required by public health) and in line with our Privacy Policy.
- Where it is needed in the public interest, such as equal opportunities monitoring, and in line with our Privacy Policy.
- Where it is necessary to enable us to perform our contract with you, such as where relevant adjustments are required.
- In limited circumstances, with your explicit written consent.

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

We will process data in accordance with the following legal grounds:

Our Contract with You:

We need to process the data we hold on you in order that we comply with our obligations with you under the contract we have with each other.

These include:

- The need to process your data to provide you with the appropriate contract.
- To allow us to grant you a lease.
- To allow us to accept rent payments under the lease.
- To enable us to supply you with the services and information which you have requested in a safe manner.
- To enable us to respond to your repair request, housing application or complaint.
- To assess the information that we collect so that we can administer and improve the services we offer.
- To contact you to send you details of any changes to our services which may affect you; and
- For all other purposes consistent with the proper performance of our operations and business.

Legal Obligation:

We are required to process your data to comply with obligations to:

- Maintain accurate records, contact details, and emergency contact details; and
- Meet any regulatory and statutory requirements and checks in relation to your engagement with us.

Legitimate Interests:

We are also required to process your data in accordance with our legitimate interests, which can occur during and after our relationship with you, which will allow us to:

- Respond to and to defend legal claims in the event of a business sale or transfer.

- To contact you for your views on our services.
- To assess the use and function of our website.
- To provide our *HousingOnline* and *MyHome* services; and
- Use your photo on the association website if you are a Board member.

Sharing your information

The information you provide to us will be treated by us as confidential. We may disclose your information to other 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 merge with another organisation, your information may be disclosed to our new partners.
- If we are required to share our information with our professional advisors.
- To our suppliers and service providers to enable them to provide their services.
- If we instruct repair or maintenance works, your details may be disclosed to the contractor to allow the services to be provided in a safe manner to you and by our contractor.
- If we are investigating a complaint, information may be disclosed to Police Scotland, local authority departments, Scottish Fire & Rescue, our professional advisors and others involved in any complaint.
- 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 authorities and the Department of Work & Pensions.
- If we are conducting a survey of our services, your information may be disclosed to third parties assisting in the compilation and analysis of the survey results.

Transfers outside the UK and European Economic Area

The information that you supply in connection with our *HousingOnline* housing application and mutual exchange services, and *My Home* tenancy service will only be stored and processed within the UK.

We may store your email address on e-newsletter services based outwith the UK or European Economic Area (EEA) solely for the purposes of communicating with you as part of your relationship with us. We will take reasonable steps to ensure that such services have UK GDPR compliant privacy policies in place.

Our consultants, contractors and suppliers as a condition of working with us may be required to communicate with us through online collaboration platforms which may be based outwith the EEA. We will take reasonable steps (such as contractual obligations with suppliers, etc) to ensure that such services have UK GDPR compliant privacy policies in place.

Security

When you give us information, we will ensure sure that your personal information is kept secure and safe. The safeguards that we have in place are described fully in our Privacy Policy a copy of which is available on our website.

Your Rights

You have the right at any time to:

- Be informed of the personal data we hold on you.
- Access and obtain a copy of all your personal data on request.
- Require us to correct any inaccuracies in your personal data.
- Require us to stop or restrict our processing concerning your personal data.
- Object to the processing of your personal data.
- Require us to delete what personal data of yours we hold.
- Personal data portability.
- Object to receiving any promotional communications from us.
- Be informed of automated decisions made in relation to you.
- Withdraw your consent to the processing of your personal data at any time, in instances where we are processing your personal data on your consent.

If you would like to exercise any of your rights above please contact us at info@ayrshirehousing.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:

The Information Commissioner's Office – Scotland
45 Melville Street, Edinburgh, EH3 7HL
Telephone: 0131 244 9001
Email: Scotland@ico.org.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, or as set out in any relevant contract we have with you.

We will keep your information for no longer than the relevant period described in the data retention schedule attached to our Privacy Policy. A copy of which can be found on our website.

If you do not wish to provide your personal data

The provision of your personal data is a requirement necessary to enter into and perform your contract with us. Certain data, such as contact details, payment information, and identity information must be provided so that we can enter a contract with you. Failing to provide the data may mean that we are unable to perform our obligations under the contract.

Some personal data is required to fulfil our obligations under public health or health and safety guidance and policies. Failure to provide such data may mean failing to meet such obligations.

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.