

Privacy Notice

Tenants / Owners and Applicants

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 process your personal data.

Who we are?

Glen Oaks Housing Association has its registered address at: **3 Kilmuir Drive, Arden, Glasgow, G46 8BW**

Glen Oaks Housing Association takes the issue of security and data protection very seriously, including compliance with the UK General Data Protection Regulation, the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations.

We are notified as a data controller with the Information Commissioner's Office under registration number Z5443064 and we are the data controller of any personal that we process regarding you.

We may collect the following personal information from you (and members of your household):

- Name
- Address
- Protected characteristics data, as defined by the Equality Act 2010
- Date of birth
- Phone numbers
- E-mail address
- National Insurance number
- Health and medical details
- Unacceptable behaviour warnings
- Payments
- CCTV imagery
- Signature
- Tenancy details
- This information comes from:
 - Housing applications
 - Correspondence about your tenancy
 - Repair requests

- Medical details
- Care and support information
- Employment details
- Criminal record declaration
- Next of kin / emergency contacts
- Marital status
- Bank account details
- Contact details
- Criminal convictions
- Start and end date tenancy
- Telephone call recordings
- Household composition
- Repairs requested
- Tenancy sign-up documents
- Complaints
- Arrangements to make payment to us

- Membership (shareholder) applications
- Factoring agreements

- Use of online services, including social media
- You directly

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

We may receive the following information about you:

- Benefits information, including awards of Housing Benefit / Universal Credit
- Payments made by you via bank transfer, AllPay or any other method
- Complaints or other communications regarding behaviour or other alleged breaches of the terms of your contract with us, including information obtained from Police Scotland and Community Safety Glasgow
- Reports as to the conduct or condition of your tenancy, including references from previous landlords, and complaints of anti-social behaviour
- Support needs of vulnerable tenants
- Information supplied by the local authority relating to homeless applications
- New home owner details
- Tracing and employment details

This information comes from:

- Local Authorities
- Health professionals
- Charities
- Other registered social landlords
- Legal Advisors
- Contractors and suppliers who have undertaken works on our behalf
- MPs, MSPs and councillors
- Utility companies
- Household members
- Debt collection agencies

We need your personal information to allow us to:

- Undertake and perform our obligations and duties in relation to the services we provide as your landlord or factor
- Enable us to supply you with the services and information that you have requested
- Respond to repair requests, housing applications, complaints and requests for medical adaptations
- Improve and develop the services we offer
- Keep you updated on any changes to our services
- Monitor our performance in relation to service delivery
- Refer you to other organisations that may support you
- Meet our legal obligations (this includes information we have to provide to regulators and statutory authorities)
- Keep you updated on any changes to our services
- Progress all other purposes consistent with the proper performance of our operations and business
- Contact you for your views on our products and services

Sharing of your information

We may disclose your personal data to any of our employees, officers, contractors, insurers, professional advisors, agents, suppliers or subcontractors, trusted third parties, government

agencies and regulators and healthcare providers insofar as reasonably necessary, and in accordance with data protection legislation.

Examples of where we may share your personal data includes the following:

- With your consent;
- To the extent that we are entitled or required to do so by law;
- 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, maintenance or upgrade works, your information may be disclosed to our contractors;
- If investigations are ongoing in relation to a complaint or crime, information may be disclosed to the Scottish Public Services Ombudsman, Police Scotland, Local Authority departments, Scottish Fire & Rescue Service, elected members 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 Department of Work & Pensions;
- We may share details with our Data Protection Team and/or Legal Advisors;
- If required by an emergency service;
- 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 required by law, we will disclose your information to statutory bodies such as auditors or solicitors;
- If your household is threatened with homelessness, your information may be shared between us and Local Health Authority and Social Care Partnership(s);
- If you request that we share your information with other RSLs who may assist in rehousing you;
- If we are pursuing debt recovery, your information may be disclosed to our solicitors and Local Authority;
- If we are making an insurance claim following an incident, we may share your information with our insurers;
- If we need to facilitate the payment of any benefits, your information may be disclosed to the Department of Work and Pensions, Local Authority or any other relevant department;
- If the Local Authority is processing information about your council tax or relating to the electoral register, your information may be disclosed to them; and If required by a regulatory body, such as the Scottish Housing Regulator, 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.

What are the legal bases for us processing your personal data?

We will only process your personal data on one or more of the following legal bases:

- contract
- consent
- our legitimate interests (including CCTV recordings, void property management, telephone call recordings, data sharing with utility companies, sending bulk SMSs, Youth Advisory Panel and payment predictions)
- vital interests
- the performance of a task carried out in the public interest and / or with official authority
- legal obligation

Special categories of personal data

Special categories of personal data 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.

The "special categories" of sensitive personal information referred to above require higher levels of protection. We need to meet additional legal requirements for collecting, storing and using this type of personal information.

Transfers outside the UK

Your information will only be processed within the United Kingdom, except where international transfers are authorised by law.

Security

When you give us information we take steps to make sure that your personal information is kept secure and safe. All information is held in accordance with our data protection policies and procedures.

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 periods as recommended by law. Once the periods have expired, the information will be destroyed if it is no longer required for the reasons it was obtained.

Your rights

You have the right at any time to request us to exercise your data subjects' rights in relation to the following:

- the right to be informed
- the right to access
- the right to rectification
- the right to object to processing
- rights in relation to automated decision making and profiling
- the right to be forgotten
- the right to data portability
- · the rights to restrict processing

If you would like to exercise any of your rights above, please contact Cindy McNeill on 0141 638 0999 or email Cindy.McNeill@glenoaks.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.

Queries and Complaints

Any questions relating to this notice and our privacy practices should be directed, in the first instance, to Cindy.McNeill@glenoaks.org.uk or by telephoning 0141 620 2705.

Our Data Protection Officer is provided by RGDP LLP and can be contacted either via 0131 222 3239 or info@rgdp.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:

Telephone: 0303 123 1113 Online: Make a complaint | ICO

This Privacy Notice was last updated on 9.10.24

Glen Oaks Housing Association is a non-profit Housing Association and a recognised Scottish Charity (No. SCO34301)

Financial Services Authority Registration No. 2402 R (S) – Scottish Housing Regulator No. HCB241

Scottish Property factor Register No. PF000173

The Association is registered as a Data Controller with the Information Commissioner's Office (ICO) under registration number Z5443064.