



## General Data Protection Regulations

### **This is our Privacy 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?

**West Granton Housing Co-operative Ltd** (“we” or “us”) is a registered society under the Co-operative and Community Benefit Societies Act 2014 with Registered Number **2357 RS** and having their Registered Office at 26 Granton Mill Crescent, Edinburgh EH4 4UT.

We take the issue of security and data protection very seriously and strictly adhere to guidelines published in Data Protection Act 2018 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 **Z7465766** and we are the data controller of any personal data that you provide to us.

As of 11 November 2019, West Granton Housing Co-op is deemed to be a Public Authority under the Freedom of Information (Scotland) Act 2002 and is, therefore, required to appoint a Data Protection Officer (DPO). We have engaged RGDP LLP ([www.rgdp.co.uk](http://www.rgdp.co.uk)) to act as our Data Protection Officer.

To contact them, please email [info@rgdp.co.uk](mailto:info@rgdp.co.uk) Please also copy us in at: [mail@westgrantonhc.co.uk](mailto:mail@westgrantonhc.co.uk)

Any questions relating to this notice and our privacy practices should be sent to: Larke Adger, West Granton Housing Co-op, 26 Granton Mill Crescent, Edinburgh, EH4 4UT or by email to [mail@westgrantonhc.co.uk](mailto:mail@westgrantonhc.co.uk)

## When we collect information about you

- When you apply for housing with us, become a tenant, request services/ repairs, or otherwise provide us with your personal details
- When you apply to become a member;
- From your use of our online services if you report any tenancy related issues, make a complaint, enquire about applying for a house, 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)
  - When you meet with us, or contact us by letter, telephone or e-mail
  - From any telephone calls recorded by us

## What Information we collect about you

Name/Marital Status	Medical/Health Issues including GP
Address	Vulnerabilities/Risks
Telephone Number	Employment Status/Income/Benefit Details
E-mail Address	Proof of ID including photographic ID;
National Insurance Number/Tax Code	Bank Details, Credit/Debit Card Details
Documents relative to your right to reside	Criminal Convictions/Offences
Next of Kin & Household Details	Ethnicity/Nationality
Date of Birth	Language
Support Needs	Images of your tenancy to evidence breaches of tenancy or to assist repairs works

## Information we receive about you 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

- To undertake and perform our obligations and duties to you in accordance with the terms of our contract with you, i.e. Scottish Secure Tenancy Agreement.
  - To enable us to supply you with the services and information which you have requested and meet your specific needs.
  - To enable us to provide a good level of service by using recorded telephone calls for training and monitoring purposes.
  - To enable us to respond to your repair request, housing application or 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 enable us to respond to your application for membership and communicate with you in relation to your membership of the Co-

operative. If your application is approved we will enter your name and address in the Register of Members.

- To enable us to communicate with you and keep you informed about our services and our performance.
- To contact you in order to send you details of any changes to our services or supplies which may affect you.
- For all other purposes consistent with the proper performance of our operations and business.
- 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/EEA. We may disclose relevant 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 merge with another business entity, your information may be disclosed to our new business partners.
- When we instruct repair or maintenance works, your information may be disclosed to any contractor/consultant.
- When 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.
- When we are updating tenancy details, your information may be disclosed to third parties (such as utility companies and Local Authority).
- When we are investigating payments made or otherwise, your information may be disclosed to payment processors, Local Authority and the Department of Work & Pensions.

- When 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.
- The production of information for electronic distribution via our website or in hard copy format e.g. Newsletters, Annual Reports, Leaflets.
- If we have to take legal action against your tenancy or pursue you for tenancy related debt, your information will be disclosed to Sheriff Officers and/or Solicitors or seek advice in relation to same.
- If we feel that you would benefit from support or advisory services we would disclose your information to relevant agencies e.g. Welfare Rights/Money Advice Mediation, Interpretation Services.
- For the purposes of crime prevention and/or the protection of vulnerable adults/children we would disclose your information to Police Scotland, Health & Social Care Services, Victim Support, Local Authority etc.
- When our external IT providers require to access our systems to assist us in relation to IT issues.
- We use Worldpay Services to provide us with terminals to process card payments at our office. Worldpay is a data controller of the personal data we share with them. They determine which items of personal data are required to provide their services, the purposes for which personal data will be used, and how long to retain the personal data. To view Worldpay's Privacy Notice and further information visit:  
<https://www.worldpay.com/en-gb/privacy-policy>

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.

Your information will only be stored within the UK and EEA.

## Security

When you give us information we will take appropriate steps to ensure that your personal data is kept secure and safe and that no unauthorised personnel can access it. Hard copy data is stored securely within lockable filing units. Data stored electronically is stored with appropriate technical and security measures.

## 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. Your data will be destroyed after the retention period has passed if it is no longer required for the reasons it was obtained. The full retention schedule is detailed within our Document Retention Policy which is available, free of charge from our office.

## 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;

- Object to, or ask us to restrict, the processing of your personal data
  - Make a request to us to delete what personal data of yours we hold;

If you would like to exercise any of your rights above, please contact us at [mail@westgrantonhc.co.uk](mailto:mail@westgrantonhc.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)

## Changes to this Privacy Notice

This Privacy Notice will be updated from time to time to reflect changes either to the way in which we operate or changes to the data protection legislation. To make sure that you keep up to date, we suggest that you revisit this notice from time to time.

**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.**