



West Granton Housing Co-operative Ltd

TENANT 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?

[West Granton Housing Co-operative Ltd](#), registered as:

A registered society under the Co-operative and Community Benefit Societies Act 2014 with the registration number 2357 RS;
A social landlord with the Scottish Housing Regulator (HAC 225);

and having our Registered Office at: **26 Granton Mill Crescent, Edinburgh, EH4 4UT** takes the issue of security and data protection very seriously and strictly adheres to guidelines published in the General Data Protection Regulation and the Data Protection Act 2018 applicable from 25 May 2018.

We are notified as a Data Controller with the Information Commissioners Office (ICO) under registration number **Z7465766** and we are the data controller of any personal data that you provide to us.

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 services/ repairs, 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 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, website or e-mail
- from any telephone calls recorded by us, or via any messages left by you
- when you visit our offices and are recorded on our CCTV system

We may collect the following information about you:

Personal details:	your name, addresses, date of birth, other household members
Contact details:	home phone number, mobile phone number and email address
Further details:	NI number, gender, ethnicity, disability, health and medical details, marital status, signature, unacceptable behaviour warnings, asylum status, criminal record declaration, employment status, tax code
Household composition	details of existing accommodation arrangements and family members seeking accommodation with the applicant
Tenancy Details:	start and end dates, rent paid, under/over payments
Payment details:	bank account details, 3 rd party payment details

Repairs:	repairs requested, access details, completion dates
Pseudonymous data:	WGHC tenant reference numbers, share membership number
Location:	IP address when you access our website, or recorded via CCTV within our offices / reception
Images:	event photographs and CCTV images
Voice Recordings:	Dependent upon what information you divulge during any/all conversations with us

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 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, Social Services and/or Local Authorities;
- 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:

- 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 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 merge with another business entity, your information may be disclosed to our new partners;
- If we instruct repair or maintenance works, your information may be disclosed to any of our contractors and/or suppliers;
- If we are investigating a complaint, information may be disclosed to Police Scotland, City of Edinburgh Council and/or Council 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 City of Edinburgh Council and/or Council departments);
- If we are investigating payments made or otherwise, your information may be disclosed to payment processors, City of Edinburgh Council and/or Council Departments and the Department of Work & Pensions;
- We may share details with our Data Protection Team and/or Legal Advisors
- 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 you are using an advice or advocacy service (such as a solicitor, advice agency or the welfare benefits advisor) we will share relevant information with them where it is necessary to progress your case.
- If you request that we share your information with other RSLs under Housing Options who may assist in re-housing you.
- If your household is threatened with homelessness, your information may be shared between us and Local Authority and/or Social Care Partnership(s).
- If we are pursuing debts associated with a tenancy or a former tenancy we may share your basic information with a third party agency to assist in the recovery of those debts;
- If we are making an insurance claim following an incident we may share your information with our insurers.
- If we are being audited then we may share your information with our auditors.
- Where there is a legal action that involves you such as action to recover a tenancy your information may be shared with a solicitor to assist in the legal process.
- 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>
- We use Moorepay to process Direct Debit payments. Moorepay 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 Moorepay's Privacy Notice and further information visit:

<https://www.moorepay.co.uk/privacy-policy/>

- To fulfil our legal and regulatory obligations to bodies such as the Scottish Housing Regulator and the Financial Conduct Authority.

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.

Transfers outside the UK and Europe

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

Security

When you give us information, we take steps to make sure that your personal information is kept secure and safe. All information is kept in line with our Data Protection Policy which is available on our website or from our office.

Only WGHC staff and partners and contractors who have signed data sharing agreements and who need to see your personal information will have access to it.

We will not usually retain your payment details unless you make payments to us using Direct Debit.

Our computer systems are located in our main office, however our staff may occasionally use laptops, tablet or other devices offsite, i.e. for homeworking. In instances where devices are used remotely this will be secure and under strict control at all times. Additionally, we have the following controls in place to ensure the security of your personal information:

- All paper based records are securely locked in storage cupboards / rooms when not actively being Used.
- Our offices are protected by an alarm system, and are monitored by CCTV.
- All WGHC computer servers are within a secure network.
- All electronic communication takes place within this secure environment.

The unauthorised use of IT systems is prevented by:

- User ID
- Password assignment
- Lock screen with password activation
- Each authorised user has a private password known only to themselves.
- Regular prompts for password amendments

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. Our full retention policy and schedule is available, free of charge, by contacting 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;
- in certain situations, make a request to us to delete your personal data;
- request we restrict processing your personal data;
- object to receiving any marketing communications from us, and;
- to be informed of any automated decisions made in relation to you.

As of 11 November 2019, West Granton Housing Co-operative 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) to act as our Data Protection Officer and they can be contacted either via 07951 241584 or info@rgdp.co.uk

We seek to directly resolve any complaints about how we handle personal information and would request you contact us in the first instance. If you are not happy thereafter, you also have the right to complain to the Information Commissioner's Office (ICO) 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

We keep this privacy notice under regular review and if there are any significant updates, we will draw attention to these via a banner page on our website. This update **July 2020**.

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.