

# Lochfield Park Housing Association Ltd

## Fair Processing Notice



### Lochfield Park Housing Association

This notice explains what personal information Lochfield Park Housing Association collects, when we collect it and how we use it. 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 information we collect from you will primarily be basic personal and contact details required to carry out our major functions as a social housing provider. However, there are occasions where we are required to collect data of a more sensitive nature and this will be treated with the appropriate level of confidentiality.

**The purpose of this notice is to make you aware of how we will handle your information.**

## Registration Details

Lochfield Park Housing Association Ltd is known as a “data controller” and is registered with the Information Commissioner (No Z5688075). Lochfield Park processes personal information in line with the General Data Protection Regulation which came into force on 25th May 2018.

## Your Personal Information

We collect information about you:

- When you apply for housing with us, become a tenant, request services/repairs;
- When you apply to become a member;
- When you use our Welfare Benefit Service;
- From your arrangements to make payment to us;
- When you make a property sales enquiry to us;
- From your use of our online services (including social media) whether to report any tenancy/factor related issues, make a complaint or otherwise;
- When you attend our community events;
- Any other instance where you provide us with your personal information.

We may collect the following personal information about you:

- Personal details: name, address, date of birth and national insurance number;
- Identification: passport and driving licence;
- Identity details: disability, ethnicity, sex, nationality (including immigration status);
- Contact details: email address, home telephone number and mobile telephone number;
- Household composition: others living the households name, date of birth, sex and relationship to you;
- Next of Kin details: name, address, phone or mobile number (that you provide to us);
- Financial information: bank details, DWP benefits, employment details;
- Convictions: unspent criminal convictions and convictions under the Sex Offenders Act 1997;
- Images: photographs, CCTV images;
- Tenancy: breach of tenancy warnings;
- Pseudonymous data: CHR application number, housing benefit reference number, share membership number, tenant number, tenant password, universal credit reference number, welfare benefits reference number;

- Further information: 5 years address history, marital status, medical details, previous tenancy reference conduct, property purchase details, relationship to staff and/or Management Committees and signature.

We receive information about you from the following third parties:

- Benefits information, including awards of Housing Benefit/Universal Credit
- Payments made by you to us;
- Reports as to the conduct of your tenancy, including references from previous tenancies, and complaints of anti-social behaviour;
- Complaints or other communications regarding behaviour or other alleged breaches of the terms of your contract with us, including information obtained from Police Scotland;
- Relevant Local Authority departments (including homelessness services and occupational therapy)

We will not collect any personal data about you that we do not need.

## Need for your personal data

We need your personal information to allow us to be able to:

- undertake and perform our obligations and duties to you in accordance with the terms of our contract with you;
- undertake and perform our rights in accordance with the terms of our contract with you, such as facilitating any legal proceedings;
- enable us to supply you with the services and information required by regulation and which you have requested;
- manage payments from you or your account and for accounting purposes;
- enable us to respond to any enquiries you make, including repair requests, housing applications, and complaints made;
- request views on our products and services;
- contact you for a number of reasons relating to your tenancy with us including to issue satisfaction surveys, newsletters, service updates or changes, and performance;
- deliver a value for money factoring facility for owners;
- analyse the information we collect so that we can administer, support and improve to develop our business and the services we offer;
- prevent and detect crime;
- Adhere to statutory regulation and providing yearly returns and statistics and meeting any other legal requirements and;
- For all other purposes consistent with the proper performance of our operations and business.

## Sharing Information with Third Parties

The information you provide to us will be treated by us as confidential and processed by our staff in the UK. We may disclose your information to the other third parties who act for us for the purposes set out in this notice or for purposes approved by you.

Third parties we may pass your personal information to include 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, we may disclose any relevant information to the contractors, suppliers or insurers to carry out the work;
- If we are investigating a complaint, information may be disclosed to Police Scotland, Local Authority departments, Local Councillor, Scottish Fire & Rescue Service and others involved in any complaint, whether investigating the complaint or otherwise;
- If we are updating tenancy details, we may disclose any relevant information to third parties (such as utility companies and Local Authority);
- If you have applied to other landlords and letting agencies for housing, your information may be shared through a tenancy reference;
- If we are investigating payments made or otherwise, your information may be disclosed to payment processors, Local Authority and the Department of Work & Pensions;
- 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;
- Your data may be shared with the Department of Work and Pensions, Trustees, Local Authorities, or any other relevant department to facilitate the payment of any benefits;
- As requested by the local authority with regards to the processing of council tax or electoral registrar;
- Your personal information may be shared with solicitors and sheriff officers to facilitate legal proceedings;
- We may share your information with FARE to assist community schemes;
- If requested by an emergency service.

We will also share specific and relevant information with law enforcement, government or public bodies and statutory agencies when we are legally required to do so. We are required to share information with statutory bodies governing finance and housing industries, for auditing and inspection purposes. 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.

## Sharing Information with Third Parties: Persons Acting On Your Behalf

If you wish that someone deal with your affairs on your behalf, please find a consent form for this on our website or request this from the office. This allows you to grant a named person permission to discuss specific or all of your personal data with us.

We will not share 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.

## Data Security

When you give us information we take steps to make sure that your personal information is kept safe and secure. The information that we receive from you or any relevant support agencies on your behalf, where possible, will be held in electronic format on our SDM Housing Software system, server or encrypted back up. Any paper copies will be held in secure, locked cabinets.

All computers are kept in a secure location and are password protected. Access to our electronic files, kept on a shared network, is controlled by user log in and passwords, making access to data only available to those who need to use it.

Our computer systems are located in our office. Occasionally we may use computers offsite, however they will at all times remain secure and under our control.

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

## Data Security: Third Party Access

Any third party who we give access to our electronic files is called a "data processor" because they are processing data on behalf of the Association. Although Data Controller and Data Processor are two separate entities, we are required to ensure all third party access is given in compliance with GDPR principles. To this affect we have third party access agreements in place.

The following organisations may be given controlled access to our electronic network for reasons of security, maintenance, or any specific purposes outlined in our third party agreement:

- IT maintenance/support contractors;
- SDM housing software;
- User and file system software providers.

## Data Retention

We review our data retention periods regularly and will only hold your personal data for as long as 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.

Once the information is no longer required for the lawful purpose for which it was obtained, it will be destroyed.

More information on the document retention schedule adopted by the Association can be found on our website; [www.lochfield.co.uk](http://www.lochfield.co.uk).

## 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;
- Make a request to delete what personal data of yours that we hold;
- Object to receiving any marketing communications from us;

If you would like to exercise any of your rights above please contact the office by;

- Dialing 0141 771 2228
- Email: [info@lochfield.co.uk](mailto:info@lochfield.co.uk)
- Or visiting the office at 37 Drumlanrig Avenue, Easterhouse, Glasgow, G34 0JF.

You also have the right to complain to the Information Commissioner's Office in relation to our use of your information. The Information Commissioners' contact details are noted below:

The Information Commissioner's Office - Scotland  
45 Melville Street  
Edinburgh  
EH3 7HL  
Telephone: 0303 123 1115  
Email: [Scotland@ico.org.uk](mailto:Scotland@ico.org.uk)



The accuracy of information held is important to us - please help us keep our records updated by informing us of any changes to your contact details. A Change of Circumstances form can be found on our website at [www.lochfield.co.uk](http://www.lochfield.co.uk).



**Lochfield Park**  
Housing Association

Registered under the co-operative and community benefit act 2014, Scottish Charity No:SCO37694, Scottish Housing Regulator No: HAC268, Financial Conduct Authority No:2444RS, Registered Property Factor No:PF000021.