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## Bridgewater Housing Association Limited

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### Privacy Notice

(How we use your personal information)

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This notice explains what information we collect, when we collect it and how we use it. During the course of our activities we will process your personal data (which may be held on paper, electronically, or otherwise) 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.

#### 1. WHO ARE WE?

**Bridgewater Housing Association Limited**, Property Factor Registration number PF000105, Industrial and Provident Societies Act 1965 (No 2525R), Scottish Housing Regulator No HAL 301, recognised Scottish Charity No SC0 35819 and having their Registered Office at 1<sup>st</sup> Floor, Bridgewater Shopping Centre, Erskine, Renfrewshire, PA8 7AA (“we” or “us”) take the issue of security and data protection very seriously and strictly adhere to guidelines published in the Data Protection Act of 2018 (the 2018 Act) and the General Data Protection Regulation (EU) 2016/679 (GDPR), together with any domestic laws subsequently enacted.

We are registered as a Data Controller with the Office of the Information Commissioner (ICO) under registration number Z7558854X and we are the data controller of any personal data that you provide to us.

Our Data Protection Officer (DPO) is:

RGDP LLP, Level 2, One Edinburgh Key, 133 Fountainbridge, Edinburgh EH3 9QG

Tel: 0131 222 3239

Email: info@rgdp.co.uk

Any questions relating to this notice and our privacy practices should be sent to Scott Currie, Corporate Services Manager.

#### 2. HOW WE COLLECT INFORMATION FROM YOU AND WHAT INFORMATION WE COLLECT

We collect information about you and you provide information to us so that we can provide information and services to you:

- when you apply for housing with us, become a tenant, request services/repairs, enter into a factoring agreement with ourselves howsoever arising 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 or factoring 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);
- from CCTV images captured by our CCTV cameras;
- when you visit our website
- when you apply for a job with us

- when you request or are in receipt of our services.

The information we collect includes the following:

- Name;
- Address;
- Telephone number;
- Email address;
- National Insurance Number;
- Demographic information – ethnicity, race, age, date of birth, nationality;
- Share membership number;
- Payment card reference;
- Next of Kin/emergency contact details;
- Household members;
- Bank Account details;
- Payment Card Numbers;
- Employment details, taxpayer identification numbers, tax reference codes;
- Medical/Health information to process an application/transfer, application/undertake sheltered duties/process medical adaptation requests and to ensure the health and safety of Bridgewater Housing Association staff, contractors and other individuals;
- Membership details;
- Hearing impairments;
- Health & safety information to process insurance claims;
- Disability;
- Benefits information from DWP/Housing Benefit Department;
- Passport or driving licence numbers.

We also receive information from third parties including:

- Benefits information, including awards of Housing Benefit/Universal Credit and any overpayments requests;
- 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, Local Authorities or other housing providers;
- Reports as to the conduct or condition of your tenancy, including references from previous tenancies, and complaints of anti-social behaviour;
- Health related information.

### **3. WHY WE NEED THIS INFORMATION ABOUT YOU AND THE LEGAL BASES FOR PROCESSING**

We need your information and will use your information lawfully to undertake and perform our obligations and duties to you. For example:

- to enable us to enter a contract with you;
- undertake and perform our obligations and duties to you in accordance with the terms of our contract with you;
- to enable us to supply you with the services and information which you have requested;
- to enable us to respond to your repair request, housing application and 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 contact you in order to send you details of any changes to our services which may affect you;
- for other purposes consistent with the proper performance of our operations and business, including newsletters, website and our annual report; and
- to contact you for your views on our products and services.
- because it is in the public interest to do so or because it is in our legitimate interest to do so.

#### **4. SHARING OF YOUR INFORMATION**

We may disclose your information to other trusted 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 or owners;
- if we instruct repair or maintenance works, your information may be disclosed to any contractor;
- if 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;
- if we are updating tenancy details, your information may be disclosed to third parties (such as utility companies and the Local Authority);
- if we are investigating payments made or otherwise, your information may be disclosed to payment processors, Local Authority and the Department for 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;
- to obtain legal advice or take legal action;
- to adhere to our statutory requirements to report to the Scottish Housing Regulator and notify the Local Authority in the event of court proceedings being raised to recover possession of a tenancy;
- if you wish to access our Welfare Rights service;
- to allow you to make payment to us through third party organisations;
- to Sheriff Officers, debt collection agencies and tracing agents in connection with any enforcement action;
- if we are processing any insurance claim made against us we will forward the claim to our insurers

Unless we have a lawful basis for disclosure, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.

#### **5. TRANSFERS OUTSIDE THE UK AND EUROPE**

We will only store your information within the UK and EEA.

#### **6. SECURITY**

When we collect your personal data we take steps to make sure that it is kept secure and safe.

The Association has been awarded the Cyber Essentials Certification which provides assurance that a number of key information security controls are in place within the organisation. All employee data which is stored electronically is access controlled or digitally encrypted.

Where a physical copy of any data is stored, it is stored in a locked filing cabinet or drawer.

Further information regarding security and storage of data can be found in our Data Protection Policy at [www.bridgewaterha.org.uk/wp-content/uploads/2018/10/Privacy-Policy.pdf](http://www.bridgewaterha.org.uk/wp-content/uploads/2018/10/Privacy-Policy.pdf)

Correct link above

#### **7. 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.

#### **8. YOUR RIGHTS**

You have rights in relation to your personal data and can ask us for the following:

- To access information about the personal data we are processing and to obtain a copy of it;

- To change incorrect or incomplete data;
- To erase or stop processing your data (in certain circumstances);
- To stop sending you marketing messages; and
- To object to certain processing activities.

If you would like to exercise any of your rights above please contact us at [admin@bridgewaterha.org.uk](mailto:admin@bridgewaterha.org.uk) in the first instance. You should note that your rights under the GDPR and 2018 Act are not absolute and are subject to qualification.

If you remain unsatisfied after your complaint has been processed by us, 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:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Website: [www.ico.org.uk](http://www.ico.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 personal and contact details.