

WEST OF SCOTLAND HOUSING ASSOCIATION LIMITED

HOW WE USE YOUR PERSONAL INFORMATION

We, West of Scotland HA, are the controller of the personal information that we hold about you, which means that we are legally responsible for how we hold and use personal information about you. It also means that we are required to comply with data protection laws when holding and using your personal information.

We have appointed a Data Protection Officer (DPO), Jennifer Cairns, who ensures that we comply with data protection law. If you have any questions about this statement or how we hold or use your personal information, please contact the DPO by: e-mail at jennifer.cairns@westscot.co.uk; telephone on 0141 550 5625; or writing to: The Data Protection Officer, West of Scotland Housing Association Limited, Camlachie House, Barrowfield Drive, Camlachie, Glasgow, G40 3QH.

You can also contact us by: e-mail at info@westscot.co.uk; telephone on 0141 550 5600; or writing to: West of Scotland Housing Association Limited, Camlachie House, Barrowfield Drive, Camlachie, Glasgow, G40 3QH.

Your attention is particularly drawn to section 2 of this statement, which confirms that you consent to your personal information and sensitive personal information being held and used by us as described in section 1 of this statement.

1. What personal information do we hold and use about you and why?

As part of your tenancy agreement with us, we hold and use the personal information that you provided to us in your housing application form, that the third parties who referred you to us provided to us and / or other personal information that we may obtain about you from you and third parties on an ongoing basis.

We use such personal information for the following purposes:

- providing you with services as the landlord of your property;
- communicating with you, including in response to any of your enquiries;
- improving our services and responding to changing needs;
- tenancy management and administration, including: processing your rent payments; carrying out repairs to your property; completing safety and other periodic maintenance checks to your property; handling and resolving complaints made by / against you; and recovering any rent arrears;
- keeping the personal information that we hold about you accurate and up-to-date;
- completing surveys to obtain more detailed information about your household;
- publishing our newsletter and other communications in hard copy format, on social media and on our website;
- preparing and submitting our annual return on the Scottish Social Housing Charter to the Scottish Housing Regulator;
- signposting you to organisations that can offer benefits and debt advice and support;
- promoting equal opportunities in the planning and delivery of our services;

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- determining whether you are to be classed as a “no lone visit”, based on our assessment of your conduct and / or the complaints that we have received about you;
- compiling statistical information and returns to our Board and the Scottish Housing Regulator; and
- providing a reference on request if you move to another landlord.

2. What is our legal basis for holding and using your personal information?

By providing us with your personal information and sensitive personal information (relating to your health, racial or ethnic origin, religious or other beliefs or sexual orientation) and the personal information and sensitive personal information of other members of your household, you:

- consent to it being used by us as described in section 1 of this statement; and
- confirm that you have informed the other members of your household over the age of 12 years old of the content of this statement and they have provided their consent to their personal information and sensitive personal information being used by us as described in section 1 of this statement.

You and the other members of your household have the right to withdraw your consent to us holding and using your and their personal information and sensitive personal information by contacting us. Once you / they have withdrawn your / their consent, we will no longer use your / their personal information and sensitive personal information for the purpose(s) set out in section 1 of this statement, which you originally agreed to, unless we have another legal basis for doing so.

Our other legal bases for holding and using your personal information are:

- performance and management of the tenancy agreement between us;
- legal and regulatory obligations which apply to us as a registered social landlord;
- protection of your vital interests; and
- our legitimate interests – while you have a legitimate interest in the protection of your personal information, we also have an overriding legitimate interest in handling and using your personal information, including sharing it with our service providers (listed in section 3 of this statement), for the purposes described in section 1 of this statement.
- performance of our public functions and powers that are set out in law to performing a specific task in the public interest that is set out in law;
- Special conditions for processing special categories of personal data as follows:

Our other special conditions for holding and using your sensitive personal information and personal information relating to criminal offences or convictions, as well as one of the legal basis set out above are:

- performance and exercise of obligations or rights for employment, social security or social protection;

- establishing, exercising and defending legal claims;
- protection of your vital interests where you cannot give consent; and
- for reasons of substantial public interest, including:
 - performance of our public functions and powers that are set out in law to performing a specific task in the public interest that is set out in law;
 - monitoring equality of opportunity and treatment;
 - prevention or detection of unlawful acts;
 - compliance with regulatory requirements in relation to unlawful acts, dishonesty, malpractice or other seriously improper conduct;
 - provision of support to individuals with a particular disability or medical condition or raise awareness;
 - protection of an individual from neglect or physical, mental or emotional harm or protection of physical, mental or emotional well-being;
 - disclosure of information to an elected representative acting on your behalf in response to a request; and
 - obtaining legal advice or in connection with legal proceedings.

3. Who do we share your personal information with?

We share your personal information with the following organisations for the purposes described in section 1 of this statement:

- SPS Doorguard and other contractors to undertake repairs, works and maintenance;
- the Willowacre Trust and the Department for Work and Pensions for benefits advice and support;
- Original Print, our mailing services provider to send our newsletter and other communications to you on our behalf;
- Bield Housing (if you are a tenant of sheltered housing) for emergency support;
- Community Safety Glasgow and other similar bodies in the local authority areas in which we operate for complaint resolution purposes;
- our Solicitors for providing advice
- our tracing agents for the recovery of rent arrears;
- Police Scotland and local authorities' anti-social behaviour departments, if you engage in anti-social or other criminal behaviour while our tenant; and
- Research Resource to undertake tenant satisfaction surveys on our behalf.
- Local authorities' social work departments and regulators, including the Scottish Housing Regulator, the Scottish Public Services Ombudsman and the Care Inspectorate

4. How long do we keep your personal information?

We will only keep your personal information for as long as we need to for the purposes described in section 1 of this statement, including to meet any legal, accounting, reporting or regulatory requirements. More information is contained in our data retention policy, which is available by contacting our Data Protection Officer (DPO).

5. What rights do you have in relation to your personal information that we hold and use?

It is important that the personal information that we hold about you is accurate and current. Please keep us informed of any changes by contacting our DPO. Under certain circumstances, the law gives you the right to request:

- A copy of your personal information and to check that we are holding and using it in accordance with legal requirements.
- Correction of any incomplete or inaccurate personal information that we hold about you.
- Deletion of your personal information where there is no good reason for us continuing to hold and use it. You also have the right to ask us to do this where you object to us holding and using your personal information (details below).
- Temporarily suspend the use of your personal information, for example, if you want us to check that it is correct or the reason for processing it.
- The transfer of your personal information to another organisation.

You can also object to us holding and using your personal information where our legal basis is a legitimate interest (either our legitimate interests or those of a third party).

Please contact our DPO if you wish to make any of the above requests. When you make a request, we may ask you for specific information to help us confirm your identity for security reasons. You will not need to pay a fee when you make any of the above requests, but we may charge a reasonable fee or refuse to comply if your request for access is clearly unfounded or excessive.

6. Feedback and complaints

We welcome your feedback on how we hold and use your personal information, and this can be sent to our DPO.

You have the right to make a complaint to the Information Commissioner, the UK regulator for data protection, about how we hold and use your personal information. The Information Commissioner's website is <https://ico.org.uk/> and complaints can be made [here](#).

7. Updates to this statement

We may update this statement at any time, and we will provide you with an updated version when are required to do so by law.