

LANARKSHIRE HOUSING ASSOCIATION LIMITED

Fair Processing 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?

Lanarkshire Housing Association Ltd, a Scottish Charity (Scottish Charity Number SC042523), a registered society under the Co-operative and Community Benefit Societies Act 2014 with Registered Number 1941R(S) and having our Registered Office at 191 Brandon Street, Motherwell, ML1 1RS, we take the issue of security and data protection very seriously and strictly adhere to guidelines published in the (Data Protection Act of 1998) 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 Z5205173 and we are the data controller of any personal data that you provide to us.

Our Data Protection Officer is the Association's Planning & Research Manager who can be contacted on 01698 269119.

Any questions relating to this notice and our privacy practices should be sent by post to the Business Manager, Lanarkshire Housing Association Ltd, 191 Brandon Street, Motherwell, ML1 1RS or by email to enquiries@lanarkshireha.com

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, enter in to 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/factor 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);

We collect the following information about you:

- Name;
- Address;
- Telephone Number;
- E-mail address;
- National Insurance Number;
- Next of Kin;
- Date of birth;
- Power of attorney (if necessary);
- Medical information (if necessary).

We 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;
- 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 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, improve and develop our business and the services we offer;

- to contact you in order to send you details of any changes to our supplies which may affect you;
- for all other purposes consistent with the proper performance of our operations and business; and
- to contact you for your views on our products and services.

Sharing of Your Information

The information you provide to us will be treated 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 merged 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 Local Authority);
- 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.

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/EEA.

All of our data storage services are located locally or in different parts of the UK.

Security

When you give us information we take steps to make sure that your personal information is kept secure and safe.

Our Privacy Policy provides details on how this information is stored and can be viewed on our website at <https://www.lanarkshireha.com>

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 the following minimum periods after which this will be destroyed if it is no longer required for the reasons it was obtained :

Category	Retained for
<i>Corporate</i>	
Register of Members & Share Certificates	Permanent or on cessation of membership
AGM Minutes	Permanent
Register of Board Members	Permanent or on cessation of membership
Complaints records	5 years (from end of financial year that complaint was lodged in)
<i>Insurance</i>	
Claims correspondence	5 years post settlement
<i>Finance, Accounting & Tax Purposes</i>	
Loan Financial Agreements	Permanent
Financial records and statements, including purchase and sales ledgers, cash and journals	7 years from end of financial year
VAT and Tax correspondence	10 years from end of financial year
Cheque books, pay in books, and bank statements	10 years from end of financial year
Rent collection records	7 years from end of financial year

Category	Retained for
<i>Contracts and Agreements</i>	
Contracts under seal and/or executed as deeds	Permanent
Contracts for the supply of goods and services	7 years after end of contract
Licensing, rental and hire purchase agreements	7 years after expiry date
Documents relating to successful tenders	7 years after end of contract
Documents relating to unsuccessful tenders	2 years after notification
<i>Health & Safety</i>	
Incident reports (including accidents)	Permanent
Consultations, meetings etc	Permanent
<i>Tenancy Records</i>	
Current Tenant files (including application form, tenancy agreement, housing benefit notifications)	Duration of tenancy
Cancelled applications for housing	1 year after submission date
Former tenant files	5 years from end of financial year
Former tenants with arrears balances	5 years from end of financial year
<i>Property Records</i>	
Property maintenance records (including work orders, repairs or planned improvements)	Permanent
Property maintenance records (statutory safety or maintenance checks / reports and inspection records including opinions)	Permanent
Property Leases	7 years from end of financial year
<i>Development & Construction Programmes</i>	
Development files (including all construction related documents, costings and reports)	Permanent

Category	Retained for
Housing Association Grants (HAG) and Loan Financing Agreements	Permanent

Our full retention schedule is available at the Association's Office, 191 Brandon Street, Motherwell, ML1 1RS.

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 us to delete what personal data of yours we hold; and
- object to receiving any marketing communications from us.

If you would like to exercise any of your rights above please contact us at enquiries@lanarkshireha.com

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

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.