

# Fair Processing Notice

## How and Why We Use Your Personal Information



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 personal data about you which may be held on paper, electronically, or in other formats. We recognise the need to treat this information in an appropriate and lawful manner. The purpose of this notice is to make you aware of how we will handle your information.

### About Us

Loreburn Housing Association is a Scottish Charity (Scottish Charity Number SC029917) and our Registered Office is Huntingdon, 27 Moffat Road, Dumfries, DG1 1NN. 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.

We are notified as a Data Controller with the Office of the Information Commissioner under registration reference **Z6168088**.

We are the Data Controller of any personal data that you provide to us.

Our **Data Protection Officer** is Rebecca Wilson. Any questions relating to this notice and our privacy practices should be sent to [rebeccaw@loreburn.org.uk](mailto:rebeccaw@loreburn.org.uk) or 01387 321356.

You can view our full Privacy Policy at [www.loreburn.org.uk](http://www.loreburn.org.uk) or you can contact our Data Protection Officer if you wish to receive a paper copy.

### Collecting Information

We collect information from you when you:

- apply for housing with us
- become a tenant
- request services
- request repairs
- enter in to a factoring agreement
- apply to become a member
- use of our online services
- make arrangements to make payment to us

This list is not exhaustive, we collect information through most of our interactions with you.

### What Information We Collect

We may collect the following information about you:

- Personal details such as your name, address, date of birth
- Contact details including phone number, mobile number, e-mail addresses, forwarding address
- Further details including National Insurance Number, Next of Kin, Power of Attorney, gender, ethnicity, disability, medical details, marital status, signature, risk warnings, household composition
- Tenancy and rent account details
- Details of repairs reported
- Details relating to your tenancy and household including information on repairs, complaints, payment history, adaptations, care packages and any other relevant information.



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- Employment, benefit and council tax status
- Images taken for newsletters, at organised events and CCTV footage

We may also record information about you whenever you contact us or use our services. We will record any action we take following the contact so we have a record of what happened and to enable us to fulfil our duties. We also record all incoming and outgoing calls for monitoring and training purposes.

We will not collect or store information from you that we do not need.

### Information from Third Parties

We may also obtain information about you from third parties including:

- Benefits information including 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 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 all other purposes consistent with the proper performance of our operations and business; and
- to contact you for your views on our services.

### Sharing Your Information

The information you provide to us will be treated by us as confidential. We may disclose your information to other third parties who act for us when we have a lawful basis to do so and 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 requested to provide a reference as part of a housing application to another provider.
- 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 services, your information may be disclosed to third parties assisting in the compilation and

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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.

We will only share your information with Third Parties who have entered into a Data Sharing Agreement or when a data sharing risk assessment has been completed.

Your information will only be processed within the UK and the European Economic Area.

## Protecting Your Information

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

- Ensuring all electronic devices are password protected and encrypted
- Encrypting emails containing personal information when this is shared with third parties
- Storing personal information held on paper copy in locked drawers/filing cabinets or locked rooms only accessible to those that require access

Further information is available within our Privacy Policy on our website.

## 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, as required by law or as set out in any relevant contract we have with you.

In general, we follow the retention guidelines provided by the Scottish Federation of Housing Associations and the National Housing Federation.

Further details on our retention periods are available within our Privacy Policy.

After these periods, the information will be destroyed securely if it is no longer required for the reasons it was obtained.

## 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
- object to receiving any marketing communications from us.

If you would like to exercise any of your rights above please contact our Data Protection Officer.

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](mailto:Scotland@ico.org.uk)

**The accuracy of your information is important to us. Please help us keep our records up to date by informing us of any changes to your email address and contact details.**

**If you or someone you know would like this information in a different format please contact us on 01387 321300 or [CustomerService@loreburn.org.uk](mailto:CustomerService@loreburn.org.uk)**



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