ROSEHILL HOUSING ASSOCIATION LIMITED

HOW WE USE YOUR PERSONAL INFORMATION (TENANTS)

We, Rosehill Housing Association Limited, are the controller of the personal information that we hold about you. This 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. This includes providing you with the details contained within this statement of how we hold and use your personal information, who we may share it with and your rights in relation to your personal information.

We have appointed a Data Protection Officer (DPO), Daradjeet Jagpal, who ensures we comply with data protection laws. 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 dpo@rosehillhousing.co.uk; telephone on 0141 881 0595; or writing to: The Data Protection Officer, Rosehill Housing Association Limited, 250 Peat Road, Glasgow, G53 6SA.

You can also contact us by: e-mail at admin@rosehillhousing.co.uk; telephone on 0141 881 0595; or writing to: Rosehill Housing Association Limited, 250 Peat Road, Glasgow, G53 6SA.

Your attention is particularly drawn to section 2 of this statement, which confirms that you consent to your personal information and special category 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 (including entering into rent payment arrangements with you); carrying out repairs to your property (including recharging such repairs to you, if relevant); assessing your housing needs; making special adaptations 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;
- determining the qualified occupier status of members of your household, where possible;

- keeping the personal information that we hold about you accurate and up-to-date;
- completing satisfaction and other surveys;
- complying with our legal and statutory duties, including those contained within the Equality Act 2010;
- publishing our newsletter and other communications in hard copy format, on social media and on our website;
- allowing you to take part in our tenant participation and engagement activities (if you choose to do so);
- preparing and submitting our annual return on the Scottish Social Housing Charter to the Scottish Housing Regulator;
- providing you with benefits, budgeting and debt and energy advice, and signposting you to organisations that can offer further advice and support to you;
- determining whether you are to be classed as a "no lone visit" or "no home visit" / "office visit only", based on our assessment of your conduct and / or the complaints that we have received about you;
- assisting with crime prevention and detection;
- protecting individuals from harm;
- compiling statistical information and returns to our Committee 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?

Data protection laws require us to have a legal reason for holding and using your personal information.

Our legal reasons 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 third parties (listed in section 3 of this statement), for the purposes described in section 1 of this statement.

In some circumstances, we may rely on your consent as the legal reason. By providing us with your personal information and special category personal information (relating to your health, racial or ethnic origin, religious or other beliefs or sexual orientation) and the personal information and special category 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 of 12 years old and above of the content of this statement and they have provided their consent to their personal information and special category 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 special category personal information by contacting us. Once you / they have withdrawn your / their consent, we will no longer use your / their personal information and special category personal information for the purpose(s) set out in section 1 of this statement, which you originally agreed to, unless we have another legal reason for doing so.

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:

- our contractors to undertake repairs, works and maintenance to your property;
- our service providers to maintain the systems on which your personal information is stored, including our housing management software, and to allow you to make rent payments to us;
- our auditors to carry out audit inspections;
- our insurers in the event of a claim being made against us;
- our survey company to undertake satisfaction surveys on our behalf;
- utility companies to manage payment of utilities for your property, including payment by you of any outstanding debts to utility companies after commencement and / or termination of your tenancy;
- organisations who provide debt advice, energy advice and energy debt assistance;
- the local authority for allocation of housing, notifying the local authority when we raise court proceedings against you to recover possession of a tenancy and compliance with our obligations under the data sharing agreements that we have entered into with the local authority;
- the Department for Work and Pensions for the assessment of benefits payable / paid to you;
- our solicitors for providing advice on debt recovery actions, anti-social behaviour, evictions and other tenancy-related matters;
- our debt collection and tracing agents for the recovery of rent arrears;
- Police Scotland, Scottish Fire and Rescue Service and the local authority anti-social behaviour department, if you engage in anti-social or other criminal behaviour while our tenant;
- Scottish Public Services Ombudsman as part of our complaints procedure;
- Scottish Housing Regulator as part of complying with the regulatory requirements that apply to us;
- third parties who undertake mailings on our behalf; and
- other landlords when providing a reference for you.

4. Will my personal information be sent outside the UK?

Some of the organisations who we share your personal information with (listed in section 3 of this statement) may be based or may make use of data storage facilities that are located outside the UK. Their handling and use of your personal information will involve us and / or them transferring it outside the UK. When we and / or they do this, we will ensure similar protection is afforded to it by:

- only transferring it or permitting its transfer to countries that have been deemed to provide an adequate level of protection for personal information as a matter of data protection law; or
- using specific contracts with such organisations, which are approved for use in the UK, and which give your personal information the same protection it has in the UK.

Please contact our DPO for further information on the specific mechanism used by us when transferring your personal information outside the UK.

5. 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 DPO.

6. 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.

7. 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 ICO's contact details are as follows:

Telephone: 0303 123 1113

Website: https://ico.org.uk/concerns/

If you would like to receive this statement in alternative format, for example, audio, large print or braille, please contact us.

8. Updates to this statement

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

Last updated: October 2021