



HEBRIDEAN HOUSING PARTNERSHIP

Privacy Notice

How We Use Your Personal Information

This privacy notice explains what personal information Hebridean Housing Partnership Ltd collects about you, how we use it, who we may share it with, how long we keep it, and what rights you have. We process personal information in accordance with the UK General Data Protection Regulation, the Data Protection Act 2018 and other applicable data protection legislation.

1. Who we are

Hebridean Housing Partnership Ltd is a Scottish charity, Scottish Charity Number SC035767, and a registered society under the Co-operative and Community Benefit Societies Act 2014, Registered Number 2644R(S). Our registered office is Creed Court, Gleann Seileach Business Park, Willowglen Road, Stornoway, Isle of Lewis, HS1 2QP.

We are registered with the Information Commissioner's Office under registration number Z9313196 and are the data controller for the personal information we process about tenants, applicants, service users, members, contractors, complainants and other individuals who engage with us.

Our Data Protection Officer can be contacted by writing to Hebridean Housing Partnership Ltd, Creed Court, Gleann Seileach Business Park, Stornoway, HS1 2QP, or by emailing dataprotection@hebrideanhousing.co.uk.

Any questions about this notice or about how we use personal information should be sent to the Data Protection Officer using the contact details above.

2. How we collect information and what we collect

We collect personal information directly from you when you apply for housing, become a tenant, request services or repairs, enter into a factoring agreement, apply to become a member, use our online services, make payments to us, make a complaint, take part in surveys or consultations, or otherwise provide information to us. We may also collect information when you provide goods or services to us, including as a contractor or subcontractor.

The personal information we may collect includes:

- identity and contact details, including name, date of birth, address, previous addresses, telephone number, email address and National Insurance number;
- housing, tenancy and household information, including household composition, connected persons, next of kin, emergency contacts, tenancy references, repairs information, complaints and anti-social behaviour records;
- financial information, including bank details, payment information, income and expenditure information, benefit entitlement, debts owed to us, bankruptcy details and information needed to support rent, factoring and payment arrangements;
- employment, contractor or service-provider information where relevant to work carried out for us;
- special category information, where necessary, including health, disability, vulnerability, ethnic origin and equalities monitoring information;

- safety and security information, including warning markers, CCTV images, visitor records, IP addresses and information needed to protect staff, tenants, residents, contractors and the public;
- information about complaints, alleged breaches of tenancy, anti-social behaviour, safeguarding concerns, fraud prevention, insurance claims, legal claims or regulatory matters.

We may also receive personal information about you from third parties where this is relevant and lawful, including local authorities, the Comhairle nan Eilean Siar Homeless Service, the Department for Work and Pensions, Police Scotland, Scottish Fire and Rescue Service, health and social care professionals, occupational therapists, previous landlords, payment providers, contractors, utility companies, regulators, insurers, legal advisers and people who make complaints or provide information to us.

3. Why we use your information and our lawful bases

We only use personal information where we have a lawful basis under the UK GDPR. Depending on the circumstances, we may rely on one or more of the following lawful bases:

- **Contract:** to manage housing applications, tenancies, factoring agreements, repairs, payments, membership arrangements, contracts with suppliers and services you have requested.
- **Legal obligation:** to meet our statutory, regulatory, accounting, tax, health and safety, equality, housing, charity, audit, insurance and reporting duties.
- **Legitimate interests:** to manage our business, improve services, prevent fraud, recover debts, investigate complaints, protect our legal position, maintain security, carry out surveys and communicate with you where this is proportionate and does not override your rights and freedoms.
- **Public task:** where we carry out functions in the public interest or support statutory housing, homelessness, equalities or regulatory functions.
- **Vital interests:** where we need to use information to protect someone's life or physical safety in an emergency.
- **Consent:** where we ask for and rely on your consent for a specific purpose. You can withdraw consent at any time, although this will not affect processing already carried out before withdrawal.

We use your information to assess and manage housing applications, allocate and manage tenancies, provide repairs and housing services, manage factoring arrangements, process payments, support benefit or Universal Credit matters, respond to enquiries and complaints, manage anti-social behaviour and tenancy issues, support vulnerable people, comply with legal and regulatory requirements, monitor equality of opportunity, improve services, carry out surveys, prevent and detect fraud, protect staff and public safety, manage insurance and legal claims, and administer our organisation.

Where we process special category information, such as health, disability, vulnerability, ethnic origin or equalities information, we will also identify a condition under Article 9 of the UK GDPR. This may include explicit consent, employment or social security and social protection law, vital interests, legal claims, substantial public interest, health or social care, or archiving, research and statistical purposes, where applicable. Where required, we will also meet the relevant conditions in Schedule 1 of the Data Protection Act 2018 and maintain an appropriate policy document.

Where we process criminal offence information or information relating to alleged offences, anti-social behaviour, safeguarding, fraud, investigations or legal proceedings, we will only do so where authorised by law and where we have an appropriate lawful basis and relevant Data Protection Act 2018 condition.

4. Sharing your information

We treat your personal information as confidential. We may share it where necessary, lawful and proportionate with organisations that help us deliver our services, meet our legal obligations, protect people, or manage our organisation. These may include:

- contractors, suppliers, repair providers, IT providers, payment processors, survey providers, professional advisers, auditors and insurers;
- local authorities, the Department for Work and Pensions, homelessness services, utility providers, emergency services, Police Scotland, Scottish Fire and Rescue Service, health and social care professionals and support agencies;
- regulators, courts, tribunals, ombudsman services, law enforcement bodies, fraud prevention agencies and other organisations where disclosure is required or permitted by law;
- business partners or successor organisations where this is necessary in connection with a merger, restructuring, transfer of services or similar organisational change.

Where we use third-party service providers to process personal information on our behalf, we require them to protect the information, use it only for authorised purposes and comply with data protection law. We do not sell personal information.

5. International transfers

We aim to store and process personal information in the UK. If personal information needs to be transferred outside the UK, we will only do so where there is an appropriate safeguard in place, such as a UK adequacy regulation, an international data transfer agreement, standard contractual clauses, or another lawful transfer mechanism under data protection law.

6. Security

We take appropriate technical and organisational measures to protect personal information from unauthorised access, loss, misuse, alteration or disclosure. Access is limited to people who need the information for their role and is controlled in line with our policies and procedures.

Hard copy records are stored securely with restricted access. Electronic records are protected using appropriate safeguards such as access controls, passwords, secure systems, firewalls, network security and encryption where appropriate.

7. How long we keep your information

We keep personal information only for as long as it is needed for the purpose for which it was collected, including to provide services, manage legal or contractual relationships, meet statutory or regulatory requirements, resolve disputes, maintain records, defend legal claims and support audit, reporting and governance requirements.

Retention periods vary depending on the type of information and the reason it is held. We review retention periods regularly and securely delete, destroy or anonymise personal information when it is no longer required.

Further information is available in our Personal Data Retention Schedule, which is available on request and, where applicable, through our website or offices.

8. Your rights

Depending on the circumstances and the lawful basis for processing, you may have the right to:

- request access to the personal information we hold about you;
- ask us to correct inaccurate or incomplete information;
- ask us to delete personal information in certain circumstances;
- ask us to restrict how we use your information in certain circumstances;
- object to processing, including processing based on legitimate interests or direct marketing;
- request data portability where this applies;
- withdraw consent at any time where we rely on consent;
- ask us not to make decisions about you based solely on automated processing, including profiling, where this has legal or similarly significant effects.

To exercise your rights, please contact us at dataprotection@hebrideanhousing.co.uk or write to the Data Protection Officer at the address above. We may need to confirm your identity before responding. Some rights are not absolute and may not apply in every case.

9. Complaints

If you are unhappy with how we have used your personal information, please contact us first so that we can try to resolve your concern. You can contact the Data Protection Officer using the details above.

You also have the right to complain to the Information Commissioner's Office. The ICO can be contacted through its website or by calling its helpline on 0303 123 1113.

10. Keeping your information up to date

Please tell us if your personal information changes, including changes to your address, email address, telephone number, household circumstances, support needs or other relevant details. This helps us keep our records accurate and provide services effectively.

