

Paragon Housing Association GDPR 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?

Paragon Housing Association is a Scottish Charity (Scottish Charity Number SC 036262), a registered society under the Co-operative and Community Benefit Societies Act 2014 with Registered Number 2521R(s) and having their Registered Office at Invergrange House, Station Rd, Grangemouth FK3 8DG (“**we**” or “**us**”) 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 Z5624595 and we are the data controller of any personal data that you provide to us.

Our Data Protection Officer is Pamela Milne, Finance & Investment Manager

Contact pmilne@paragonha.org.uk Invergrange House, Station Rd, Grangemouth FK3 8DG

Any questions relating to this notice and our privacy practices should be sent to our Data Protection Officer set out above.

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);
- when you are a member of a scrutiny panel or any participation group;

We collect the following information about you:

- name;
- address;
- correspondence address;
- telephone number;
- e-mail address;
- National Insurance Number;
- date of birth;
- next of kin;
- gender;
- household composition;
- employment details;
- income;
- housing benefit / universal credit details;
- title deeds;
- complaints;
- anti-social behaviour;
- behaviour warnings;
- references;
- photo identification;
- arrears information;
- criminal activity;

- race;
- ethnic origin;
- disability;
- medical information;
- any permission requests;
- payment details;
- survey information.

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;
- Medical reports for medical adaptations and Social Work reports for applications;
- Tracing and Employment details from debt collection agencies;
- Title Deeds.

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 or 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 by us 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;
- If we are recovering debt from current or former tenancy arrears, including recharges;
- If we are processing an insurance claim, your information will be shared with our insurance company;
- If requested by an emergency service.

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 and EEA. We may transfer your information outside the UK and/or EEA.

If you are an owner and we factor your property and you are living out with the UK, invoices and other relevant information will be emailed to your specified email address.

Where information is transferred outside the UK or EEA we ensure that there are adequate safeguards in place to protect your information in accordance with this notice, including the following:

Password protected file sent by email.

Security

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

We have taken the following steps:

- Our systems are password protected;
- Patch updates are applied to our servers;
- We regularly review our system access rights;
- Paper files are locked away;
- We restrict access only to relevant personnel;
- You will be asked to confirm your identity by answering questions or provide a signed mandate before we release information regarding your tenancy.

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:

- Current Tenancies – Duration of tenancy;
- Former Tenancies – 6 years from tenancy end date;
- Current Factored Owners - Duration of factoring;
- Former Factored Owners - 6 years from factoring end date;
- Current Applications – Duration of Application / Tenancy;
- Former Applications – 3 years from date of cancelled application;
- Current Members - Duration of membership;
- Former Members - Permanent record

after which this will be destroyed 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; and
- object to receiving any marketing communications from us.

If you would like to exercise any of your rights above please contact us at **enquires@paragonha.org.uk**

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.