



Fair Processing Notice

Issue No:	1
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GDPR Fair Processing Notice

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?

Ore Valley Housing Association are a non-profit making voluntary organisation, registered as an Industrial & Provident Society with the Financial Conduct Authority, Reg. No. 2382(S). We are registered with the Scottish Housing Regulator as a Registered Social Landlord, (RSL) under the Housing (Scotland) Act 2010, Reg. No. HCB236. We are a registered Scottish Charity, Reg No. SCO31773. We are a registered Property Factor Reg. No. PF000639. Our registered office is at 114-116 Station Road, Cardenden, Fife, KY5 0BW.

Ore Valley Enterprises (OVE) are Registered as a Private Landlord under the Anti-Social Behaviour Scotland Act 2014, Reg No. 336494/250/04131. This will require to be updated when we receive confirmation of our Letting Agent Status which is a requirement on or before 01/10/18.

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 Reg. No. Z5454706 and we are the data controller of any personal data that you provide to us.

Our Senior Corporate Support Officer (Maryjane Elder) deals with all our Data Protection and can be contacted on 01592 723835, email: dataprotection@orevalleyha.org.uk

Any questions relating to this notice and our privacy practices should be sent to the above postal address or by email to: dataprotection@orevalleyha.org.uk

We collect information from you:

- We receive a nomination from a Local Authority or referring partner or when you fill in an application form for housing and request one of our properties
- Select an offer of one of our properties
- Request any of our services
- You call, write email or meet with us

- Voluntarily complete our customer surveys
- Provide feedback, compliments or to make a complaint
- Make an application for employment and become a member of staff
- Make an application and become a Board member

We collect the following information about you:

- Name
- Address
- Contact details (phone, email or correspondence address)
- Basic details (name and DOB) of all household residents
- Bank details if you pay your rent by Direct Debit
- National Insurance Number
- Next of Kin
- Sensitive personal data such as medical history, disability, gender; ethnicity; religion or other beliefs, sexual orientation, and medical history.

We receive the following information from third parties:

- Benefits information, including awards of Housing Benefit/ Universal Credit
- Payments made by you to us
- Prior landlords and credit agencies when you apply for housing
- Councillors, MPs or other representatives acting on your behalf/instruction
- 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
- Applicable business rates information from the Local Authority.

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
- Complying with relevant legislation and regulation
- Help with public protection, crime prevention and the prosecution of offenders
- Provide you with welfare services including advice and appropriate support
- To contact you in order to send you details of any changes to our details or our suppliers or contractors which may affect you
- To contact you for your views on our products and services

- For all other purposes consistent with the proper performance of our operations and business.

We may also take photographs at our events, at our properties and in our communities to use for general marketing and publicity. However, photographs of individuals will only be used for those purposes with your consent.

Our tenants receive our newsletter with information about what is going on within the organisation. We are required by our regulator to keep our tenants informed and to offer opportunities for involvement, but you may opt-out of receiving this by contacting: dataprotection@orevalleyha.org.uk.

We will only discuss or communicate your tenancy or lease details with those named on the agreement or those authorised by you. You can authorise someone either temporarily or permanently in writing to us.

Additional services

We conduct a number of additional services including organising community events, tenant groups, providing debt advice, adapting the property you live in and gathering information to improve our services.

For these services, where your personal information is needed, we will always notify you about the service being offered, explain the service and obtain your consent to proceed, usually by way of a sign up/consent form for that service.

Property information

Much of the data we use relates to our properties and their maintenance and repair. We do not consider property information used in conjunction with the property address to be your personal information. For example the age of your kitchen, planning to replace your bathroom or a repair to the property.

We are happy to provide you with the answers to questions you may have about the property you are living in and any work done to it. As soon as your name, contact details or other personal information is used in conjunction with the property information, such as to complete a property repair visit, then this is treated as personal data.

We produce a number of different publications designed to inform you about our services and other useful topics. There are leaflets on comments and complaints, our quarterly newsletter, our annual report and our performance report.

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. We may share 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 merge 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, business clients 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
- We may share your information with a language translation service if it is necessary to translate any information into or from a foreign language for you

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.

Where your information may be held

Your information may be held at our offices and those of our group companies and third-party agencies, service providers as described above.

Transfers outside the UK and Europe

We do not transfer any personal information outside of the European Economic Area (EEA).

Security

When you give us information we take steps to make sure that your personal information is kept secure and safe. Please refer to our Data Protection & Confidentiality Policy and Privacy Policy for more information on this.

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.

Our full retention schedule is available on our website.

Your Rights to Access Data

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 us at:
dataprotection@orevalleyha.org.uk

Changes to our privacy notice

We keep our privacy notice under regular review and will place any updates on our webpage (**Link**)

How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you:

By email: dataprotection@orevalleyha.org.uk

By letter: Maryjane Elder, Senior Corporate Support Officer, Ore Valley Housing Association, 114-116 Station Road, Cardenden, Fife, KY5 0BW - please mark your letter Private and Confidential)

By Telephone: 01592 721 917

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.