



Dunbritton Housing Association Limited

Name of Policy	Tenants & Owners Privacy Notice
Responsible Officer	Finance & Corporate Services Manger
Date of next Review	May 2027
Section	Corporate Services

We can produce information, on request, in large print, Braille, tape and on disc. It is also available in other languages. If you need information in any of these formats please contact us on 01389 761486

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1. Preamble

This notice explains what information we process, when we collect it and how we use it. 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 process your personal data.

2. Introduction

The purpose of this privacy notice is to explain to you the reasons why we may hold and use your personal data and explain your rights under the current data protection laws, in relation to your usage of our website. This privacy notice explains how we collect and use personal information about tenants & owners.

Separate versions of Privacy Notices are issued to our, Website Users, Staff and Board Members.

Your personal information will be processed by:

Dunbritton Housing Association of: 1 Hatters Lane, Dumbarton, G82 1AW

We are registered as a data controller with the Information Commissioner's Office ('ICO') and our registered number is Z7205348.

3. Where does your personal information come from?

The Association may collect information in the following ways which include:

- Personal data which you have provided to us
- Housing applications
- Correspondence about your tenancy
- Repair requests
- Membership applications
- Factoring agreements
- Tenancy sign-up documents
- Complaints
- Arrangements to make payment to us
- Use of online services, website, social media etc.

We may also record factual information whenever you contact us or use our services, as well as information about other action we take, so that we have an accurate record of what happened.

4. We may collect the following personal information from you (and members of your household):

The Association controls and processes a range of information about you. In this privacy notice 'your personal information' means your personal data i.e. information about you from which you can be identified. Your 'personal information' does not

include data where your identity has been removed (anonymous data). It is important that the personal information that we hold and process about you is accurate and up to date. Please keep us informed if your personal information changes during your engagement with us.

This includes:

- Name
- Address
- Protected characteristics data, as defined by the Equality Act 2010
- Date of birth
- Health and medical details
- Care & support information
- Employment details
- Criminal convictions
- Phone number
- E-mail address
- Other contact details
- National Insurance number
- Unacceptable behaviour warnings
- Payment information
- CCTV imagery
- Signature
- Tenancy details, as defined within a Tenancy Agreement
- Next of kin
- Emergency contact
- Marital status
- Bank account details
- Tenancy dates
- Household composition
- Repairs requested:

5. Additional Personal Information

We may also receive the following information about you:

- Benefits information, including awards of Housing Benefit / Universal Credit
- Payments made by you via bank transfer, AllPay or any other method.
- Complaints or other communications regarding behaviour or other alleged breaches of the terms of your contract with us, including information obtained from Police Scotland and Community Safety Glasgow
- Reports as to the conduct or condition of your tenancy, including references from previous landlords, and complaints of anti-social behaviour.
- Support needs of vulnerable tenants, including medical reports for medical adaptations and Social Work reports for applications.
- Information supplied by the local authority relating to homeless applications.
- New homeowner details
- Tracing and employment details

We receive this information from:

- Local Authorities
- Health professionals
- Charities
- Other registered social landlords
- Legal Advisors
- Contractors and suppliers who have undertaken works on our behalf.
- MPs, MSPs and councillors
- Utility companies
- Household members
- Debt collection agencies

We may use this personal information to:

- Undertake and perform our obligations and duties in relation to the services we provide as your landlord or factor.
- Enable us to supply you with the services and information that you have requested.
- Respond to repair requests, housing applications, complaints, and requests for medical adaptations.
- Improve and develop the services we offer.
- Keep you updated on any changes to our services.
- Monitor our performance in relation to service delivery.
- Refer you to other organisations that may support you.
- Meet our legal obligations (this includes information we have to provide to regulators and statutory authorities)
- Keep you updated on any changes to our services.
- Progress all other purposes consistent with the proper performance of our operations and business.
- Contact you for your views on our products and services.

6. If you do not wish to provide your personal data

You have obligations under your contract / potential contract with us to provide the us with the necessary data. If you do not provide this information, this will hinder the Association's ability to enter into or maintain a contract with you.

7. Who do we share your personal information with?

We may disclose your personal data to any of our employees, officers, contractors, insurers, utility companies' professional advisors, agents, suppliers or subcontractors, selected third parties, government agencies and regulators and healthcare providers insofar as reasonably necessary, and in accordance with data protection legislation.

We may also disclose your personal data:

- With your consent.
- To the extent that we are entitled or required to do so by law.
- 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, maintenance or upgrade works, your information may be disclosed to our contractors.
- If investigations are ongoing in relation to a complaint or crime, information may be disclosed to the Scottish Public Services Ombudsman, Police Scotland, Local Authority departments, Scottish Fire & Rescue Service, elected members, 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 need to protect our finances when you have vacated a property, we may disclose your personal data (name and forwarding address only) to utility companies, or debt collection agencies.
- If we are investigating payments made or otherwise, your information may be disclosed to payment processors, Local Authority, and the Department of Work & Pensions.
- We may share details with our Data Protection Team and/or Legal Advisors.
- If required by an emergency service.
- 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 required by law, we will disclose your information to statutory bodies such as auditors or solicitors.
- If your household is threatened with homelessness, your information may be shared between us and Local Health Authority and Social Care Partnership(s);
- If you request that we share your information with other RSLs who may assist in re-housing, you.
- If we are pursuing debt recovery, your information may be disclosed to our solicitors and Local Authority.
- If we are making an insurance claim following an incident, we may share your information with our insurers.
- If we need to facilitate the payment of any benefits, your information may be disclosed to the Department of Work and Pensions, Local Authority, or any other relevant department.
- If the Local Authority is processing information about your council tax or relating to the electoral register, your information may be disclosed to them; and
- If required by a regulatory body, such as the Scottish Housing Regulator, Financial Conduct Authority, or the Office of the Scottish Charity Regulator
- 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.

8. What are the legal bases for us processing your personal data?

We will only process your personal data on one or more of the following legal bases:

- contract
- consent
- our legitimate interests (including CCTV imagery and data sharing with utility companies)
- vital interests
- public interest / official authority
- legal obligation

9. Processing special category personal data

Special categories of personal data means information about your racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; health; sex life or sexual orientation; criminal convictions, offences or alleged offences; genetic data; or biometric data for the purposes of uniquely identifying you.

The special categories of personal information referred to above require higher levels of protection. We need to meet additional legal requirements for collecting, storing and using this type of personal information.

10. Where do we keep your data?

Your information will only be stored within the United Kingdom except where international transfers are authorised by law.

11. How long do we keep your personal 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 and in accordance with our Data Retention Policy and Schedule and set out in any relevant contract we have with you.

12. How do we keep your personal information secure?

When you give us information, we take steps to make sure that your personal information is kept secure and safe. All personal data is processed in accordance with Dunbritton Housing Association's data protection policies and procedures. Our systems are password protected and all electronic data is stored securely. All paper files are kept in locked cabinets.

13. Your rights

You have the right at any time to exercise your data subjects' rights in relation to the following:

- the right to be informed
- the right to access
- the right to rectification
- the right to object to processing
- rights in relation to automated decision making and profiling
- the right to be forgotten
- the right to data portability
- the rights to restrict processing

When you make a request, we are required to verify your identity and may ask you for specific information to fulfil this purpose. Normally, 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.

If you wish to exercise your right to access your information, or any other right, please contact our Data Protection Officer ('DPO') for more information.

It is important that the personal information that we collect, hold and use about you is accurate and current. Please keep us informed of any changes by contacting our assigned DPO.

14. Queries and Complaints

We seek to directly resolve any queries or complaints about how we handle information and would request that they be directed, in the first instance, to admin@dunbritton.org.uk or by telephoning 01389-761486.

Our Data Protection Officer is provided by RGDP LLP and can be contacted either via 0131 222 3239 or info@rgdp.co.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:

Telephone: 0303 123 1113

Online: [Make a complaint | ICO](#)

We keep this privacy notice under regular review and will place any updates on this website.

This Privacy Notice was last updated on 20/05/2024