



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?

Trust Housing Association Ltd are a Scottish Charity (Scottish Charity Number SC009086), a registered society under the Co-operative and Community Benefit Societies Act 2014 with Registered Number 1778R(S) and having their Registered Office at 12 New Mart Road, Edinburgh, EH14 1RL. 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 registration number Z8915556 and we are the data controller of any personal data that you provide to us.

Trust's Data Protection Officer (DPO) is our Data Protection Project Lead, contact email dataprotection@trusha.org.uk. Any questions relating to this notice and our privacy practices should be sent to the DPO.

How we collect information from you and what information we collect

We collect information about you:

- when you apply for housing, support, care or other services with us, become a tenant, resident or service user, 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 applying for a job vacancy, 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 sign up as a member of Happy To Translate;

We may collect the following information about you:

- name;
- address and former address;
- telephone number;
- e-mail address;
- National Insurance Number;
- Personal characteristics such as gender, ethnic group, disabilities;
- Next of Kin;
- Date of birth;
- Power of attorney/guardian and their contact details;
- Medical information;
- Prescribed medication and doseage;
- Personal care information;
- Communication and language preferences;
- Religious and cultural beliefs;
- Financial information including bank account details;
- Details of any sexual offences;
- Immigration residential status;
- Tenancy reference number
- Tenancy management information;
- Arrears and payment arrangements;
- Relationship with Board members and employees;
- Information required to assess application;
- Food preferences and allergies;
- Photograph;
- Your job title

We may receive the following information from third parties:

- Benefits information, including awards of Housing Benefit/ Universal Credit;
- Information from the NHS or Social Work;
- Payments made by you to us (including allpay details);
- 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

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 services 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 enter into a common housing register your information will be shared with the system provider and other partners
- We will share your information at your request through power of attorney/guardianship or a signed written agreement;
- We will share your information where required with our regulators including the Scottish Housing Regulator and the Care Inspectorate;
- We will share your information when engaging online email marketing companies to assist us in communicating with you any updates regarding the services supplied by Happy To Translate

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.

Security

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

Details of security measures that are in place can be found in our Privacy Policy. This can be viewed on our website at www.trustha.org.uk.

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:

ITEM	RETAIN FOR
Governance	
Register of Members & Share Certificates	Permanent
AGM minutes	Permanent
Register of Board Members	5 years after cessation of membership
Complaints records	5 years (from final reply)
Insurance	
Insurance & Claims records	6 years
Finance, Accounting & Tax	
Financial records – including purchase & sales ledgers, cash, VAT, journals	7 years after year end
Payroll, including pension, NI, tax and sick pay	7 years after year end
Cheque books, pay-in books	7 years after year end
Bank statements	7 years after year end
Contracts and Agreements	
Contracts under Seal and/or executed as deeds	12 years after project end incl. defects period
Contracts for the supply of goods & services	6 years after contract end

Licensing, rental and hire purchase agreements	6 years after expiry
Documents relating to successful tenders	1 year after contract end
Documents relating to unsuccessful tenders	1 year after notification
Membership applications for Happy To Translate.	? years after the end of your membership
Health & Safety	
Accident books and records and reports of accidents	3 years after the date of the last entry
Health and Safety assessments and records of consultations with safety representatives and committee	Permanently
Health records	During employment and 3 years thereafter if reason for termination of employment is connected to health
Tenancy records	
Current tenant files including application form, tenancy agreement, housing benefit notifications, tenancy management details etc	Duration of tenancy
Former tenant files – key data	3 years
Personal plans and associated documents	3 years after end of tenancy
Cancelled applications	3 months from cancellation
Rent payment records	7 years after year end
Adult Support & Protection referrals	3 years after end of tenancy
Property records	
Lease of property from/to another agency/organisation	3 years after end of lease

Property maintenance records – general repairs, planned/cyclical maintenance, major repairs, improvements	Permanent (or until no longer used/owned)
Property maintenance records – annual/statutory safety or maintenance checks	3 years

after which this will be destroyed if it is no longer required for the reasons it was obtained.

Our full Data Retention Policy schedule is available at our Head Office.

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 dataprotection@trusha.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.