

KNOWES HOUSING ASSOCIATION

TENANTS & OWNERS PRIVACY NOTICE

How we use your personal information

Preamble

This notice explains what personal 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.

Introduction

The purpose of this privacy notice is to explain to you the reasons why we may hold and process your personal data and explain your rights under the current data protection laws.

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, employees, committee members, suppliers, contractors, and other business contacts.

Your personal information will be processed by:

Knowes Housing Association of: 10 Field Road, Faifley, Clydebank, G81 5BX

We are registered as a data controller with the Information Commissioner's Office ('ICO') and our registered number is Z5301532.

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.

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 in:

- Housing applications;
- Correspondence about your tenancy or property maintenance;
- Request services or repairs;
- Factoring agreements;
- Tenancy sign-up documents;
- Complaints;
- Arrangements to make payment to us;
- Use of online services, website (see our separate privacy notice for website users); and
- Membership applications.

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.

We may also receive information from other, third parties, as detailed below.

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

- Name;
- Address;
- Protected characteristics data, as defined by the Equality Act 2010;
- Date of birth;
- Health and medical details;
- Care & support information;
- Employment details;
- Passport Number;
- Criminal convictions;
- Phone number;
- E-mail address;
- Other contact details;
- National Insurance number;
- Unacceptable behaviour warnings;
- Payment information;
- CCTV imagery (when you visit our premises);
- Telephone call recordings (during telephone communications with us);
- Signature;
- Tenancy details, as defined within a Tenancy Agreement;
- Next of kin;
- Emergency contact;
- Marital status;
- Bank account details;
- Tenancy dates;
- Whether you have served in the armed forces;
- Household composition; and
- Repairs requested.

We may also process the following information about you (please note that this list is not exhaustive):

- 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; and
- 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;
- Department of Work and Pensions; and
- HMRC.

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; and
- Contact you for your views on our products and services.

If you do not wish to provide your personal data

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

Who might my data be shared with, or seen by?

We may disclose your personal data to any of our employees, officers, contractors, insurers, professional advisors (including legal advisers and our Data Protection Officer), 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;
- 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;
- If required by a regulatory body, such as the Scottish Housing Regulator, Financial Conduct Authority or the Office of the Scottish Charity Regulator; and
- 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.

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:

- When we are entering into a **contract** with you, or performing our obligations under it, such as when you have a tenancy or factoring agreement with us.
- For our **legitimate interests** (including CCTV imagery, telephone recordings, vacant property management, next of kin details, distributing informational newsletters and surveys, and for home analytics)
- Where we **perform a task in the public interest**, such as the provision of housing services for the prevention and alleviation of homelessness, and the management of housing accommodation where we have granted a Scottish secure tenancy;
- Where necessary so that we can **comply with a legal or regulatory obligation** to which we are subject;
- Where it is necessary your **vital interests**, for example in the case of medical emergency suffered by an individual on our premises, or a safeguarding issue which requires us to share your information with the emergency services; and
- Where we have obtained your **consent** to do so.

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.

Our legal basis for processing your special category data is:

- (a) Explicit consent;
- (b) Employment, social security and social protection (if authorised by law);
- (c) Vital interests;
- (d) Not-for-profit bodies;
- (e) Made public by the data subject;
- (f) Legal claims or judicial acts;
- (g) Reasons of substantial public interest (with a basis in law);
- (h) Health or social care (with a basis in law);
- (i) Public health (with a basis in law); and
- (j) Archiving, research, and statistics (with a basis in law).

Where do we keep your data?

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

How do we keep your data safe?

When we are provided with personal data, we take steps to make sure that your personal information is kept secure and safe. All data is held in accordance with Knowes 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.

How long do we keep your data?

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 / best practice, or as set out in any relevant contract we have with you and in accordance with our Data Retention Policy and Schedule.

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; and
- 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.

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 info@knowes.org or by telephoning 01389 877 752.

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 3 June 2024.