

## **Fair Processing Notice**

### **How we use your information**

Langstane Group is a Data Controller, registered with the Information Commissioner's Office (ICO). Our registration number is Z5741017.

The Langstane Group (The Group) comprises the following registered companies:

- Langstane Housing Association Ltd – a Registered Social Landlord and Registered Scottish Charity SCO11754. Property Factor Number 000666
- Langstane Property Ltd – a subsidiary of Langstane Housing Association Ltd Langstane Property Ltd. Is a private landlord that deals with mid-market lets and other related commercial activities
- Langstane Developments Ltd & Langstane Maintenance Ltd – these companies are currently dormant subsidiaries of The Group

This notice tells you what to expect when The Group collects and handles your personal information. This applies to information we collect about any person that provides personal details to us as a housing applicant, tenant, former tenant, or other customer.

Our Data Protection Officer is Ash Reid, Governance and Corporate Manager. You can contact Mrs Reid by email at [governance@langstane-ha.co.uk](mailto:governance@langstane-ha.co.uk) or by telephone on 01224 423000.

### **Why we process your personal data**

We need your information and will use your information:

- a) To undertake and perform our obligations and duties to meet the terms of the legal contract we have with you. This contract is the Tenancy Agreement.
- b) To enable us to process your housing application.
- c) To analyse the information that we collect in order that we can administer, support, improve and develop our services and our business.
- d) For all other purposes and legitimate interests consistent with performance of our business and operations.

### **When we collect information from you**

We collect information about you:

- When you apply for housing with us, become a tenant and request services from us as a customer
- When you apply to become a member of the Association or join our Board of Management. Please note that we collect information about place of birth for Board Members in order to submit certain license applications to Local Authorities
- When you use our website to request repairs and other services, or make a complaint
- When you engage with us on social media
- When you make payment arrangements with us (such as bank details, employment details, benefit entitlement, and income and expenditure information)
- When you exercise your rights under the Freedom of Information (Scotland) Act 2002.

## What kind of information do we collect?

We only collect information that we need in order to meet our duties and obligations as a landlord. Where we do collect information we only ever use it for the purpose for which we collected it in the first place. Information that we collect includes:

<b>Contact information</b>	your name, address, postcode, email address, telephone numbers, employment contact details, Next of Kin details, contact details of people who have authority to act on your behalf.
<b>General information</b>	your date of birth, your household details, your employment details, your experiences and views of our services, your contact preferences, your National Insurance Number where it is required, and information we need to deal with complaints
<b>Information relevant to your housing application</b>	your date of birth, your household details, your current housing circumstances, your preferences for accommodation, relevant medical and equalities monitoring information with your consent, and background checks on previous tenancies relating to behaviour, rent arrears and other housing related debts.
<b>Information we get from third parties</b>	rent payment information, benefits information, tenancy reports, and reports from Police Scotland or Local Authorities requested when we investigate reported breaches of tenancy.

## How do we use the information?

We use the information we collect so that we can deliver our services to you. We use your information to:

- Manage housing allocations – this is the process of letting our houses
- Manage tenancies and neighbourhoods
- Process rent and service payments
- Provide a repairs and maintenance service
- Resolve neighbourhood disputes and anti social behaviour complaints
- Investigate service complaints
- Engage with customers about our services and decisions
- Contact you for feedback on our service

## Who might we share your information with?

Sometimes we will share your information with third parties. We will only disclose relevant information to the third parties set out in this notice, or where we have an information sharing agreement in place.

These third parties are listed below:

- a) Police Service - Where they have a legitimate reason to formally request your information
- b) Department of Work and Pensions – to investigate matters related to payments
- c) Benefits Departments – we have an obligation to inform them of any changes to your circumstances that may affect your claim for Housing Benefit or Universal Credit
- d) Council Tax Office – we provide them with the dates of your tenancy and any forwarding address that we may have
- e) The Accountant in Bankruptcy (or appointed Trustee) where the court judgement is in evidence. This information sharing is a legal obligation under Section 108 of the Bankruptcy (Scotland) Act 2016, applying to specific financial and business related data
- f) Utilities Companies – we provide them with the dates of your tenancy and any forwarding address that we may have
- g) Scottish Housing Regulator – the body that carries out inspections of Housing Associations
- h) Our solicitors - where there is a legal action that involves you
- i) Our accountants – when we are being audited
- j) Appointed consultants to carry out specific projects such as our full tenant satisfaction survey, or business improvement projects
- k) Our contractors – in order that they can complete work on our behalf, or contact you to arrange appointments
- l) Our insurers – when we need to make a claim following an incident
- m) Our auditors – when they are reviewing the work of the Association to ensure compliance with the law and regulatory requirements
- n) Debt collection agencies – tenants who leave the Association in debt will be referred to an agency and their basic information and contact details provided
- o) Our chosen deposit scheme providers, for people who rent our mid market properties and pay a security deposit
- p) Local authorities where we have specific data sharing agreements in place, for example; to monitoring anti social behaviour complaints and housing applicant nominations, for public safety arrangements, or if your household becomes threatened with homelessness
- q) Partner businesses where we have agreed to work together on specific housing related projects and require to contact tenants to provide or collect information regarding the project or service concerned

Should any other third parties not detailed above request information about you, we will only share that information if you have provided your permission. We will not otherwise share, sell or distribute your information without your consent.

## **Online surveys**

We use a third party service, Survey Monkey, to design, collect and analyse surveys that we carry out in order to meet our commitment to engage with our customers. This service is governed by its own privacy agreement which is available here - <https://www.surveymonkey.co.uk/mp/legal/privacy/>

Our customers are under no obligation to take part in any survey or consultation activity.

## **Visitors to our website**

When someone visits [www.langstane-ha.co.uk](http://www.langstane-ha.co.uk) we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone.

We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do make a decision to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

## **Online feedback from our website**

The online contact form on our website generates an email to a secure inbox that a limited number of staff has access to. Once the details have been recorded on our housing management software, the enquiry is directed to the most relevant member of staff and the original email is deleted from our email system.

## **People that contact us via social media**

Our social media platforms are managed by a restricted number of staff members. Information received is recorded on the housing management system. At least once a year any personal messages stored on the social media platforms are deleted.

## **People that phone us**

Incoming calls to the Association are recorded via a phone software system. On occasion calls are monitored to ensure the quality of service provided. Recordings are retained for 30 days and then deleted from the system.

## **Job Applicants, Current and Former Employees**

When individuals apply to work with The Group, we will only use the information they supply to us to process their application and to monitor recruitment metrics. Where we want to disclose information to a third party, for example where we want to take up a reference or obtain a 'disclosure' related to criminal records we will not do so without informing them beforehand (unless the disclosure is required by law).

Personal information about unsuccessful candidates will be held for three months after the recruitment exercise has been completed, it will then be destroyed. We retain anonymised statistical information about applicants to help inform our recruitment activities, but no individuals are identifiable from that data.

Upon commencing employment, we compile data relating to their employment which is kept secure and is only used for purposes directly relevant to that person's employment. Once their employment has ended, we will retain the file in accordance with the requirements of our retention schedule and then delete it. All employees are provided with a specific fair processing notice with full details regarding how their personal information is handled.

### **How secure is the information?**

Keeping your personal details secure and private is very important to us. We have security measures in place to protect against the loss, misuse, and alteration of personal data under our control.

Only authorised personnel have access to personal information. The organisational and technical security measures we have in place to safeguard your personal information comply with the UK General Data Protection Regulation. For further information please see our [Privacy Policy](#) and our [I.T. Security Policy](#).

Our front-line security procedures mean that when you contact us, we will request proof of your identity before we are able to disclose any personal information to you.

The Association does not transfer or store your personal data outside of the UK and European Economic Area unless there is an adequacy decision in place for that country.

### **How long we will keep your information**

We will hold your personal data only for as long as we require it for a relevant activity, or as required by law. Our teams have document management processes in place in order to control the storage and flow of personal information in the Association. We will generally keep your information for the following minimum periods:

- Housing Applicants – for as long as you have a current housing application. When you cancel your application, we will delete your housing application records, and any associated evidence within three months of the cancellation date. If you are housed by us, your application for housing is filed with your tenant records.
- Tenants – your records are retained for the duration of your tenancy. When you terminate your tenancy, we retain your housing application and related documents for one year following the termination date. Your tenancy agreement and termination form are deleted after three years, unless specific conditions apply.
- Court orders are retained for ten years.
- A variety of employment related information is held in accordance with the timescales set out in our retention schedule following the termination of the contract of employment.

Our document retention schedule is available [here](#) or by request.

## Your Rights

### Access to your personal information

You can ask for a copy of the information that we hold about you by making a 'subject access request' under the UK General Data Protection Regulation. If we do hold information about you we will:

- provide you with a description of it;
- let you have a copy of the information in an intelligible form.

Any of our staff can provide you with advice about your right to access your personal data. If you seek a specific small piece of information, we will deal with your request informally if you agree to this, for example by providing you with the specific information you need over the telephone.

To make a request to Langstane for a copy of your personal information that we hold, please put the request in writing, or contact our team to discuss your information request.

### What if the Association has inaccurate information about me?

You have the right to have the inaccurate information deleted or corrected, depending on the information concerned. You can ask us to correct or remove any mistakes by contacting the Governance and Corporate Team at [governance@langstane-ha.co.uk](mailto:governance@langstane-ha.co.uk) or by telephone on 01224 423000.

The accuracy of your information is important to us. We will check your information from time to time when you contact us by telephone, or by sending you requests for an update. Please help us by keeping us up to date with any changes to your household, or contact information.

### The right to deletion

This is also called the right to be forgotten. You have the right to ask us to delete information that we hold about you. We will consider all requests for deletion on a case-by-case basis and provide a written response to these requests. Please contact Ash Reid, Governance and Corporate Manager, at [governance@langstane-ha.co.uk](mailto:governance@langstane-ha.co.uk) or by telephone on 01224 423000 if you want to know more about the right to be forgotten.

### The right to object to marketing communications

The Association is not selling any products or services. We will not provide your information to any third party that intends to make a profit from use of your information, or to perform any marketing activity.

You will receive the Association newsletter twice per year. It is issued to all our tenants by email where possible, or by hard copy. The newsletter contains information about our services and how we are performing as a landlord. It is important that we provide our tenants with the information in the newsletters. It ensures that people who need our services are aware of them, and also allows our tenants to take part in our decision making processes which is a legal right of tenancy. Those tenants who object to receiving our newsletter can ask to be removed from the mailing list.

## **Making a complaint about Data Protection**

You have the right to complain to the Information Commissioner's Office in relation to the use of your information. The details for contacting them are:

The Information Commissioner's Office – Scotland  
Queen Elizabeth House  
Sibbald Walk  
Edinburgh  
EH8 8FT

Telephone: 0303 123 1113

Email: [Scotland@ico.org.uk](mailto:Scotland@ico.org.uk)