



## **Privacy Statement**

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

#### **1. Introduction**

This statement explains:

- what personal information we collect about you
- when we collect it, and,
- how we use your personal information

During the course of our activities, we will handle and use personal information about you, and we recognise the need to treat it in an appropriate and lawful manner. The purpose of this statement is to make you aware of how we will handle and use your personal information.

This personal information can be held electronically on our systems or on paper.

#### **2. Who are we?**

We, Maryhill Housing, are a Scottish Charity (Scottish Charity Number SCO32468), a registered society under the Co-operative and Community Benefit Societies Act 2014 with Registered Number 1904R(S) and have our Registered Office at 45 Garrioch Road, Glasgow, G20 8RG.

We take the issue of security and data protection very seriously and strictly adhere to the UK General Data Protection Regulation (GDPR) 2021 and the Data Protection Act 2018, together with any other relevant laws now and in the future.

We are registered as a fee payer with the Office of the Information Commissioner under registration number Z5989470 and we are the controller of any personal information that we handle and use about you.

Any questions relating to this statement and our privacy practices should be sent to The Data Protection Officer, Maryhill Housing, 45 Garrioch Road, Glasgow, G20 8RG, by phone on 0141 946 2466, or e-mailed to [corporatesupport@maryhill.org.uk](mailto:corporatesupport@maryhill.org.uk).

#### **3. How we collect personal information from you and what personal information we collect**

##### **3.1 Introduction**

We collect personal information about you:

- when you apply for housing with us, become a tenant or enter into a factoring agreement with us.

- when you apply to become a member.
- from your use of our online services.
- when you contact us directly by letter, email, phone call, social media, or other methods.
- from your arrangements to make payments to us of rent, factoring charges or any repairs that are rechargeable to you.
- when you apply for a job with us, or you become an employee.
- when you apply to be or become a Board member.

## 3.2 Personal Information Collected

### 3.2.1 Housing

We collect some or all the following personal information about you if you are applying for a house with us or if you are our tenant (if applicable to you):

- Name
- Address
- Phone number
- Email address
- National Insurance Number
- Date of Birth
- Marriage and civil partnership
- Pregnancy and maternity
- Employer information
- Doctor information
- Health information
- Disabilities
- Sex
- Gender Re-Assignment
- Immigration-related documentation/Passport
- Next of Kin
- Driving Licence
- Department of Work & Pensions letters and information
- Information on Carers, Support Workers, or Link Workers
- Sexual orientation
- Religious beliefs or other beliefs of a similar nature
- Ethnic origin
- Addictions
- Schedule 1 Sex Offenders Criminal Convictions
- Information on charges
- Anti-Social Behaviour information
- Incident sheets
- Financial Information – bank account, income details and confirmation, bank statements, direct debit information, details of benefits and pensions (private and state)
- Payments made by you to us
- Complaints and compliments made by, against or involving you
- Repair requests and completion records
- Other correspondence from you and between us
- Recording of telephone calls

Not all this personal information will be collected at the same time. It will be collected at different times, for example on applying for a tenancy, being allocated a house or if an incident occurs etc. Most of this information will be saved within your tenant file, however certain protected characteristics, such as marriage and civil partnership and pregnancy and maternity data, will be anonymised and used to inform future strategic planning by the Association.

We receive the following personal information from third parties when you apply for a house with us or are our tenant:

- Section 5 Homelessness referrals from Glasgow City Council
- Police regarding disclosures of offences and incident numbers
- Glasgow City Council regarding benefits information
- DWP regarding Universal Credit information
- Glasgow City Council Social Work department
- References from previous landlords
- Glasgow City Council regarding temporary furnished accommodation tenants
- From contractors – email, calls and in person
- Feedback from contractors about repairs or works at your property or where there is a problem e.g., you have threatened or otherwise behaved inappropriately towards a contractor
- Occupational Health, Glasgow City Council, for adaptation requirements
- Citizens Advice Bureau regarding complaints
- Councillors, MSPs, MPs regarding queries and complaints made by them on your behalf
- Doctors regarding potential health issues arising from, e.g., damp within your property

### 3.2.2 Factoring

We collect some or all the following personal information, as required, about you if you are our factoring customer:

- Owner Name
- Owner Address
- Phone Number
- Email address
- If the landlord does not live at the property, a forwarding address.
- Financial information regarding payments, charges, responses, arrangements to pay, etc.
- Purchase information
- Borrowing at purchase date
- Any further mortgages, security arrangements etc. in relation to the factored property
- Name of lender
- Percentage share of property repairs
- Factoring bills and payments
- Recording of telephone calls
- Complaints and compliments made by, against or involving you.
- Correspondence from you and between us

We receive the following personal information from third parties when you are a factored customer:

- When a factored property is sold/purchased, details are received from the respective Solicitors.
- Title deed information from the Registers of Scotland.

The majority of personal information is collected at the initial stage and updated with any further personal information thereafter on an ongoing basis.

### 3.2.3 Finance

We collect some or all the following personal information, as required:

- Insurance:
  - For block policies - names and addresses
  - Insurance claims – name, address, contact information, medical information where there have been injuries/illness giving rise to the claim, financial information (of losses)

We receive the following personal information from third parties when you are our tenant or factored customer:

- Glasgow City Council Housing Benefit Schedule – Name, Address, National Insurance Number, Benefit amount.
- Royal Bank of Scotland Bank Statements – Name, tenancy number and amount paid for those using direct debit.
- Court Citation – Offender's name, court date, name of our employee called to court.
- World Pay/AllPay – Tenant's name, rent reference, address (sometimes), and amount paid.
- Sole traders – Name, address, contact information and bank details.
- Invoices (received with job orders attached) – Tenant's name, address, job details and, where available, phone number
- Factored property conveyancing – How much is paid, name, address.
- Job sheets provided by our Maintenance section to the contractor – name, address, contact details and the nature of the work to be undertaken at your property.

### 3.2.4 Board Membership

We collect some or all the following personal information about you if you are applying to become a Board member or if you are a Board member (if applicable to you):

- Name
- Address
- Phone number
- Email address
- Date of Birth
- Marriage and civil partnership
- Pregnancy and maternity
- Disabilities
- Sex
- Gender Re-Assignment

- Religious beliefs or other beliefs of a similar nature
- Ethnic origin
- Other correspondence from you and between us
- Bank details (if required for expenses).
- Notification of Members Interests which can include personal information on family members.
- Board application form including job history and employer(s).

The majority of personal information is collected at the initial stage and updated with any further personal information thereafter on an ongoing basis. Most of this information will be saved within your Board member file, however certain protected characteristics, such as marriage and civil partnership and pregnancy and maternity data, will be anonymised and used to inform future strategic planning by the Association.

### 3.2.5 Job Applicants/ Employees

We collect some or all the following personal information about you if you are applying for a job with us or if you are our employee (if applicable to you):

- Name
- Address
- Phone number
- Email address
- National Insurance Number
- Date of Birth
- Marriage and civil partnership
- Pregnancy and maternity
- Employer information
- Disabilities
- Sex
- Gender Re-Assignment
- Immigration-related documentation/Passport
- Next of Kin
- Driving Licence
- Department of Work & Pensions letters and information
- Sexual orientation
- Religious beliefs or other beliefs of a similar nature
- Ethnic origin
- Information on charges
- Incident sheets
- Financial Information – bank account, pension details
- Complaints and compliments made by, against or involving you.
- Other correspondence from you and between us
- Job application form including job history and employer(s).

### 3.2.5 Other

The following personal information is also handled and used by us:

- Members of Registered Tenants Organisations: Name, address, phone number, email address.

- Members of Community Councils: Name, address, phone number, email address.
- Individuals seeking tickets for events: number of adult and number of children's tickets and the address to send the ticket(s) to. Contact information is maintained on a Register of interested people.
- Classes: Contact information (name, address, phone number, email address) for enquiries. List of who attended.
- Residents Conference: Contact information (name, address, phone number, email address) for enquiries. List of who attended.
- Other Organisations for example, pop-up allotment group: Contact information of members of management committees (name, address, phone number, email address).
- Rent consultation online survey: name, address, email address. This is not processed further.
- Customer Kitty and Community Fund Applications: Name, address, phone number, email address and health information (sometimes).
- List of members – name, address, email, phone number.
- List of visitors to buildings.
- People captured by CCTV images.

This personal information is collected only when required.

We receive the following other personal information from third parties:

- Glasgow Life, Northern United Communities, Jobs & Business Glasgow - Name and address of participants if they attended classes.
- Apprenticeships and work placements as part of Community Benefits policy – Name, address, job details from employing contractor.
- Information from Workers Education Association - Name, address, date of birth, date started, date completed (English as a 2<sup>nd</sup> language).
- MP/MSP/Councillor enquiries will include name and address of constituent and can include sensitive personal information on illnesses/health if this is the subject of, or is relevant to, the enquiry.
- Queens Cross Housing Association: Names, address phone numbers email addresses for Hub Board members.

#### **4. Why we need this personal information about you and how it will be used**

##### 4.1 Introduction

We will use your personal information:

- to perform our obligations and duties to you in accordance with the terms of our tenancy or factoring agreement 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, complaints made or any of your enquiries.
- to analyse the information we collect so that we can administer, support and improve and develop the services we offer.
- to contact you in order to send you details of any changes which may affect you.

- to ensure our Board and staff team are representative of the community we service.
- to contact you for views and to carry out surveys; and
- for all other purposes consistent with the proper performance of our operations.

## 4.2 Why we collect your personal information

### 4.2.1 Housing

In addition to the above, we will use your personal information to:

- Enter your housing application onto our system.
- Allocate and offer properties to you.
- Support and maintain your tenancy.
- Collect, assess, and complete benefit claims or make referrals to third parties on your behalf.
- Provide adaptations to your property or make arrangements where you are vulnerable or have access requirements.
- Provide our contractors with the personal information they need to carry out the works and repairs at your property.
- Issue alerts.
- Provide a reference on request if you move to another landlord.
- Obtain advice on anti-social behaviour and evictions.

### 4.2.2 Factoring

We will use your personal information to:

- Determine income from repairs for factored owners against contract sum.
- Issue Recharge Bills according to individual liability.
- Issue quarterly invoices.
- Provide factoring services.
- Manage the building.
- Respond to complaints.

### 4.2.3 Finance

We will use your personal information to:

- Manage Insurance claims.
- Record and manage rent payments.
- Record and manage other payments.
- Obtain advice on debt recovery actions.

### 4.2.4 Board Membership

We will use your personal information to:

- Record your membership with the Scottish Housing Regulator, Financial Conduct Authority and Scottish Charity Regulator.
- Ensure we meet money laundering regulations.

### 4.2.5 Job Applicants/ Employees

We will use your personal information to:

- to perform our obligations and duties to you in accordance with our terms and conditions of employment with you.
- Ensure we comply with our legal obligations i.e., we are required to check a successful applicant's eligibility to work in the UK before employment starts.
- Allow us to manage the recruitment process, assess and confirm your suitability for employment and decide who to offer a job to.
- Respond to and defend against legal claims.
- Allow us to make reasonable adjustments for candidates/ staff who have a disability.
- Seek information about criminal convictions and offences. This is because it is necessary for us to carry out our obligations and exercise specific rights in relation to employment.

#### 4.2.6 Other

We will use your personal information to:

- Sign grant and other applications.
- Report to the Scottish Housing Regulator and other regulators
- Apply for funding.
- Produce and issue our newsletters and other communications.
- Pay expenses.
- Determine whether you are to be classed as a "no lone visit", based on our assessment of your conduct and/or the complaints that we have received about you.
- Determine Customer Kitty and Community Fund awards.
- Maintain our membership list.

#### 4.3 Legal Basis

The law requires us to have a legal reason for handling and using your personal information.

**In some circumstances, we may rely on your consent as the legal reason. By providing us with your personal information and sensitive personal information (relating to your health, racial or ethnic origin, religious or other beliefs or sexual orientation) and the personal information and sensitive personal information of other members of your household, you:**

- **consent to it being used by us as described in this statement; and**
- **confirm that you have informed the other members of your household of 12 years old and above of the content of this statement and they have provided their consent to their personal information and sensitive personal information being used by us as described in this statement.**

**You and the other members of your household have the right to withdraw your consent to us holding and using your and their personal information and sensitive personal information by contacting us. Once you/they have withdrawn consent, we will no longer use your/their personal information and sensitive personal information for the purpose(s) set out in this statement, which you originally agreed to, unless we have another legal reason for doing so.**



Our other legal reasons for holding and using your personal information are:

- performance and management of the tenancy or factoring agreement between us.
- legal and regulatory obligations which apply to us as a registered social landlord.
- protection of your vital interests; and
- our legitimate interests – while you have a legitimate interest in the protection of your personal information, we may also have an overriding legitimate interest in handling and using your personal information for the purposes described in this statement.

## **5. Sharing your personal information**

### 5.1 Introduction

The personal information you provide to us will be treated by us as confidential and will be mainly handled and used by our employees. We may disclose your personal information to other third parties who act for us for the purposes set out in this statement or for other purposes approved by you, including the following:

- If we instruct repair or maintenance works, your personal information may be disclosed to our contractors.
- If we are investigating a complaint, your personal information may be disclosed to Police Scotland, Local Authority departments, Scottish Fire & Rescue Service and others involved in the complaint.
- If we are updating tenancy details, your personal information may be disclosed to third parties (such as utility companies and Local Authority).
- If we are investigating payments made, your personal information may be disclosed to payment processors, Local Authority, and the Department of Work & Pensions.
- If we are conducting a survey, your personal information may be disclosed to third parties assisting in the compilation and analysis of the survey results.
- If you are a member of a Registered Tenant Organisation, your personal information may be disclosed to The Scottish Government Tenant Priorities team for maintenance of the publicly available (RTO) register.

### 5.2 Housing

Third parties with whom we may share your personal information include:

- AllPay – tenant name, address, bank account sort code and account number
- Energy Advisors– tenant name, address, phone number, email address for energy advice/supplier
- Glasgow City Council – name, address, rent or Council tax amount, income details for Council Tax and Housing Benefit
- Glasgow City Council – name, address, phone number, email address, age, disability information for the Council Garden Maintenance Scheme
- Fire & Rescue Service – name, address, phone number, disability and help required to leave building for vulnerable people in multi-storey properties.
- Contractors – name, address, phone number, repair required, access issues, support requirements, alerts.

### 5.3 Factoring

We may share your personal information with solicitors on buying/selling property to ensure details are accurate.

### 5.4 Board Membership

Third Parties with whom we may share your personal information include:

- Auditors – Details of Board members including name, address, date of appointment/resignation, date of birth.
- Scottish Housing Regulator – Names and dates of appointment of Board members.
- Office of the Scottish Charity Regulator – Names and dates of appointment of Board members.
- GWSF, SHARE, SFHA and EVH – Names of Board members regarding training courses and conferences.

### 5.5 Job Applicants/ Employees

Third Parties with whom we may share your personal information include:

- HMRC – Employee's name and address, date of birth, date of employment, national insurance number, salary information.
- Auditors - Employee's name and address, date of birth, date of employment, national insurance number, contract of employment, salary information.
- Website – employee names.
- Pension Company - Employee's name and address, date of birth, date of employment, national insurance number, salary information and pension deduction amount.
- Solicitors – Employee's name and address, date of birth, date of employment, national insurance number, details of disciplinary action taken, sickness and absence records, salary information.
- Sheriff Officers – employee's name address and payment deducted.
- Credit Union – employee's name and address and payment deductions.
- Union Membership - employee's name and address and payment deductions.

### 5.6 Finance and Other

- Members' name and address lists to printing and mailing company.
- Tenants' and Owners' name and address lists to printing and mailing company.
- Employees' name and address lists to printing and mailing company.
- Board and members' names in press releases and other communications
- Website – Board member names.
- Google Analytics – IP address and device used to access our website.
- Solicitors and our debt recovery and tracing agents – such personal information as may be necessary for the recovery of rent arrears and other debts owed by you to us.

## 6. Transfers of your personal information outside the UK and the EU

Your personal information will only be stored within the UK and the EU.

## **7. Security of your personal information**

We take steps to make sure that personal information is kept secure and safe. All personal information is held in accordance with our Data Protection Policy, a copy of which is available on our website. Our systems are password protected and all electronic personal information is stored securely. All paper files are kept in locked cabinets or in offices with secure restricted access.

## **8. How long we will keep your personal information**

We review our data retention periods regularly and will only hold your personal information 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 personal information for specified periods of time), or as set out in any relevant contract we have with you. Our Retention Schedule provides full details and is available on our website.

## **9. Your rights in relation to your personal information**

It is important that the personal information that we hold about you is accurate and current. Please keep us informed of any changes. Under certain circumstances, the law gives you the right to:

- ask for a copy of the personal information that we hold about you.
- require us to correct any inaccuracies in your personal information.
- request us to delete the personal information that we hold about you (also known as the right to be forgotten).
- ask us to stop using or restrict use of your personal information e.g., if you want us to check whether it is accurate or if we are handling and using your personal information in breach of legal requirements.
- transfer your personal information to another organisation; or
- object to receiving any non-essential communications from us or to our handling and use of your personal information where our legal reason for handling and using it is a legitimate interest (either our legitimate interests or those of a third party).

If you would like to make any of the above requests, please contact us at:  
[corporatesupport@maryhill.org.uk](mailto:corporatesupport@maryhill.org.uk).

When you make a request, we may ask you for specific information to help us confirm your identity for security reasons. 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. We will respond within one calendar month.

## **10. Feedback and complaints**

We welcome your feedback on how we hold and use your personal information.

You have the right to make a complaint to the Information Commissioner's Office, the UK regulator for data protection, about how we hold and use your personal information. The Information Commissioner's Office contact details are as follows:

Telephone: 0303 123 1113

Website: <https://ico.org.uk/concerns>

## **11. Updates to this statement**

We may update this statement at any time, and we will provide you with an updated version when we are required to do so by law.