



**Castlehill Housing Association
Aberdeen Care and Repair
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?

Aberdeen Care and Repair is a registered voluntary organisation and charity (Reg. No. SC015306) managed by Castlehill Housing Association (a Scottish Charity (Scottish Charity Number SCO13584), a registered society under the Co-operative and Community Benefit Societies Act 2014 with Registered Number L0968 and having their Registered Office at 4 Carden Place Aberdeen). We take the issue of security and data protection very seriously and strictly adhere to guidelines published in the Data Protection Act 2018 and the General Data Protection Regulation (EU) 2016/679.

We are notified as a Data Controller with the Office of the Information Commissioner under registration number Z734745X and we are the data controller of any personal data that you provide to us.

Our Data Protection Officer is Alison Watson. Any questions relating to this notice and our privacy practices should be sent to info@castlehillha.co.uk

How we collect information from you and what information we collect

We collect information about you:

- when you request Aberdeen Care and Repair services or otherwise provide us with your personal details. This information is provided to us by you/your representative or by one of our referral partners if you are being referred.
- when you report any service-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)

We collect the following information about you:

- name
- address
- telephone number
- e-mail address

- date of birth
- National Insurance Number
- Next of Kin
- Banking details
- Accommodation, tenure & household details
- Medical and support issues
- Support services received
- GP information
- Income/benefits information

We receive the following information from third parties:

- The above listed information (except NI number) is received from our referral partners if you are referred by them to Aberdeen Care and Repair. Our referral partners include (but are not limited to) the relevant Local Authority, Care Providers, Third Sector Organisations, Occupational Therapists, Social Work and the NHS
- Payments made by you to us

Why we need this information about you and how it will be used

We need your information and will use your information:

- to enable us to provide effective services suitable for your needs
- to enable us to supply you with the services and information which you have requested
- to enable us to respond to your requests 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 for our services
- 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.

The information you provide to us will be treated by us as confidential and will be processed only by our employees within the UK. 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 merge with another business entity, your information may be disclosed to our new business partners or owners;
- If we instruct repair, maintenance or adaptation works, your information may be disclosed to any contractor;
- External evaluators, internal and external audit depending on the scope of the audit
- Third party service providers if you are being referred to another service
- If we are claiming benefits for you, your information is obtained and sent directly to the Department of Work & Pensions
- If we are investigating payments made or otherwise, your information may be disclosed to payment processors, Local Authority and the Department of Work & Pensions, debt collection agencies
- If we are conducting a survey of our service, your information may be disclosed to third parties assisting in the compilation and analysis of the survey results

- Our regulatory bodies such as the Office of the Scottish Charity Regulator (OSCR), Scottish Housing Regulator (SHR), Scottish Public Services Ombudsman (SPSO), the Care Inspectorate and the Scottish Social Services Council (SSSC)
- Our solicitors or our insurers where there is a legal action or claim that involves you
- If we need to communicate with you by post, information will be shared with our contracted mail services provider, who will electronically receive, print and post the document(s) to you.

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. Where information is transferred outside the UK or EEA we ensure that there are adequate safeguards in place to protect your information in accordance with this notice.

Security

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

All staff who work for Aberdeen Care and Repair sign a Code of Conduct and, as part of that, are required to adhere to our Privacy and Confidentiality Policy. We also have mandatory Data Protection training for all staff. Our Data Protection Officer oversees the compliance with our data protection obligations and our procedures are subject to internal audit by a qualified auditor.

All your information is kept securely both within our Castlehill Offices and on our IT system which has appropriate levels of security. We use an off site backup for our IT systems that has a high level of encryption.

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

Our full retention schedule is available on our website at www.castlehillha.co.uk

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

4 Carden Place, Aberdeen AB10 1UT

or view the Data Protection – Subject Access Request form on our website.

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 contact details or other personal information

February 2021