

## TENANT PRIVACY NOTICE



**Kingsbridge**  
**Cleddans**

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HOUSING ASSOCIATION LIMITED

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## **Kingsridge Cleddans Housing Association Ltd. (Referred to as 'KCHA')**

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 process your personal data.

### **Privacy Notice for Tenants**

KCHA is a data controller and will collect and process your personal data. We are required to explain to all clients the personal data we collect, the purpose for processing and the legal basis we are relying on. This is an overview of our Privacy Notice; our full Privacy Notice is available on the KCHA website at [www/kc-ha.com](http://www/kc-ha.com), or you can request a copy from our Data Protection Lead.

#### **Who are we?**

**Kingsridge Cleddans Housing Association Ltd**, registered as:  
a Scottish Charity (Scottish Charity Number SCO382236),  
a registered society under the Co-operative and Community Benefit Societies Act 2014 with Registered Number 2378 RS  
Registered with the Scottish Housing Regulator, Number HCB 234  
and having their Registered Office at: **KCEDG Commercial Centre, Unit 2/3 Ladyloan Place, Glasgow, G15 8LB**

We are notified as a Data Controller with the Information Commissioner's Office under registration number ZA324188 and we are the data controller of any personal data that you provide to us.

Our Data Protection Officer is appointed as RGDP LLP, [info@rgdp.co.uk](mailto:info@rgdp.co.uk).

#### **What information do we collect?**

KCHA collects and processes a range of information containing personal data about you. We process this information in order to be able to provide our services as a full-service legal firm under our contract with you, or to comply with our legal obligations.

We are required to process your personal information when we have a contract with you for the provision of legal services and there may be some occasions where processing of special category personal data (such as health or ethnicity) is required. Where we process special category data it is necessary for the establishment, exercise, or delivery of your tenancy agreement.

The personal data we collect, and use will only be the minimum necessary for your case. The following table shows the data we collect and process in relation to your tenancy.

<p><b>Data processed as necessary for the performance of a contract with you:</b></p> <p><b>Contact Details</b> (name, telephone numbers, email, address), for contacting you regarding the case we are dealing with. Any personal data that is required to provide you with advice. This could be financial information; special category personal data or any other personal data as is required.</p> <p><b>Payment details</b> (bank account/ credit/debit card number), for processing payments required</p>	<p><b>Data Processed as necessary to meet a legal obligation:</b></p> <p><b>Identification Documents</b> (copies of passports, driving licence (photographic evidence and home address), for verifying your identification and your home address to comply with anti-money laundering obligations with which KCHA must comply.</p>
<p><b>Data processed that is necessary for the legitimate interests of KCHA or a third party:</b></p> <p><b>Contact Details</b> (name and email), for keeping in touch and to send you information about our services, legal updates, and information about our events. You will always be given the option to unsubscribe from receiving these emails and if you do not want to receive this information from KCHA then please email <a href="mailto:admin@kc-ha.com">admin@kc-ha.com</a></p>	

### Who has access to your data?

Your information may be shared internally within KCHA on a need-to-know basis as appropriate. We may share your personal data with the following third parties where it is necessary for the legal service, we provide to you:

- Service providers and their sub-contractors we are using to run our business including identity checks; IT services providers; confidential waste disposal services and document storage providers; marketing service providers. Where we use these providers, we have appropriate contractual arrangements in place to ensure that these third parties do not use our data for their own purposes, will treat it with confidence and that they keep the data secure
- We will also share your data as required by law with, for example, Government authorities, law enforcement bodies, regulators for compliance with legal requirements.

### 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:

- contract
- your consent
- our legitimate interests
- your vital interests
- public interest / official authority
- legal obligation

## **Processing special category personal data**

Special categories of personal data mean 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 sensitive 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.

### **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 does KCHA protect your personal data?**

KCHA takes the security of your data seriously. KCHA has policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused, or disclosed, and is not accessed except by authorised persons who have a need to know in order to perform their duties and are under a duty to maintain the confidentiality and security of such information.

If personal data is transferred outside the EU, we will ensure that adequate safeguards are in place, relying on an adequacy agreement or other contractual terms as appropriate.

### **How long do we keep your personal 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, as recorded in our Data Retention Policy and Schedule.

## **Your rights**

As a data subject, you have a number of rights in relation to your personal data. These are listed below.

- The right to access information about your personal data KCHA is processing and to obtain a copy of it;
- The right to require KCHA to change incorrect or incomplete data;
- The right to require KCHA to erase or stop processing your data in certain circumstances; and
- The right to object to the processing of your data where KCHA is relying on its legitimate interests as the legal ground for processing.
- The right to data portability from KCHA

A fee will not generally be charged for exercising any of these rights unless your requests are unfounded or are manifestly excessive.

If you would like to exercise any of these rights, or if you have any concerns about how your personal data is being processed, please contact our Data Protection lead at KCHA; or our Data Protection Officer at: [info@rgdp.co.uk](mailto:info@rgdp.co.uk) ; Telephone: 0131 222 3239.

### **Queries and Complaints**

Any questions relating to this notice and our privacy practices should be directed, in the first instance, to [paul@kc-ha.com](mailto:paul@kc-ha.com) or by telephoning 0141 944 3881

Alternatively, you can contact our Data Protection Officer, who is provided by RGDP LLP and can be contacted either via 0131 222 3239 or [info@rgdp.co.uk](mailto: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: [www.ico.org.uk/make-a-complaint/](http://www.ico.org.uk/make-a-complaint/).

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.

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