

WEBSITE AND SUPPLIER / CONTRACTOR PRIVACY NOTICE

(How we use your personal information)

This notice explains what information we collect, when we collect it and how we use it when you visit our website. 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.

Who we are

We are **Viewpoint Housing Association** of Viewpoint House, 4 South Oswald Road, Edinburgh EH9 2HG.

We are registered as a data controller with the Information Commissioner's Office ('ICO') and our registered number is Z6355994.

Viewpoint Housing Association takes the issue of security and Data Protection very seriously, including compliance with the UK General Data Protection Regulation, the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations.

This website privacy notice explains how we collect and use personal information about website users and suppliers / contractors. Separate versions of Privacy Notices are issued to our Customers, Staff and Committee Members.

How we collect information from you and what information we collect

Website Users

- report a repair to us;
- pay your rent;
- apply for a house;
- make a complaint to us; and
- complete and submit a "contact us" form to us.

Please note that our website uses Cookies. You can change your Cookies setting using the 'Cookies Setting' tool.

We may use this personal information to:

- provide you with the services that you have requested from us;
- communicate with you, including in response to any of your enquiries;
- improve our services and respond to changing needs;
- process your rent payments;
- carry out repairs to your property;
- handle and resolve complaints made by, or, against you;
- keep the personal information that we hold about you accurate and up to date (if you provide any new personal information to us via the website); and
- signpost you to organisations that can offer benefits and debt advice and support.

Suppliers and Contractors

- Name
- Contact details, including phone numbers, addresses and email addresses
- References
- Bank Details
- CCTV imagery

• Telephone call recordings

We will use this information to potentially enter into or enter into a contract with you and for the administration of our organisation.

If you do not wish to provide your personal data

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

Who do we share your personal information with?

We may disclose your personal data to any of our employees, officers, contractors, insurers, professional advisors, agents, suppliers or subcontractors, 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 required to do so by law;
- to complete a regulatory return in relation the Management e
- to protect the rights, property and safety of us, our customers, users of our websites and other persons;
- in connection with any ongoing or prospective legal proceedings;
- If we are investigating a complaint, information may be disclosed to solicitors, independent investigators such as auditors, the Scottish Housing Regulator and other regulatory body involved in any complaint, whether investigating the complaint or otherwise;
- to the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling;
- to another organisation if we enter into a joint venture or merge with another organisations.

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
- consent
- our legitimate interests (including CCTV imagery and telephone call recordings)
- vital interests
- the performance of a task carried out in the public interest and / or with official authority
- legal obligation

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 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 long do we keep your personal information?

We will only keep your personal information for as long as we need to for the purposes described above, including to meet any legal, accounting, reporting or regulatory requirements. More information is contained within our data retention policy and schedule which is available via our website (within the 'Documents' section).

How do we keep your personal information secure?

The security of your personal information is of paramount importance to us and we use appropriate technical and organisational measures to safeguard your personal information.

However, while we will use reasonable efforts to safeguard your personal information, the use of the Internet is not entirely secure and, for this reason, we cannot guarantee the security of any personal information that is transferred by or to you via the Internet. If you have any concerns about the security of your personal information, please contact our Data Protection Officer (DPO) for more information.

Your rights

You have the right at any time to request 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
- the rights to restrict processing

Queries and Complaints

Any questions relating to this notice and our privacy practices should be directed, in the first instance, to DPO@viewpointhousing.org.uk.

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: <u>Make a complaint | ICO</u>

We keep this privacy notice under regular review and will place any updates on this website.

This privacy notice was last updated on 26.9.23.