



**GENERAL DATA PROTECTION REGULATION (EU)  
2016/679 (“the GDPR”)**

# **FAIR PROCESSING NOTICE**

**MAY 2018**

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## **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?

Waverley Housing is a Scottish Charity (Scottish Charity Number SC026231), a Company registered in terms of the Companies Acts, with Registration Number 115066 and having its Registered Office at 51 North Bridge Street HAWICK TD9 9PX.

We take the issue of security and data protection very seriously and strictly adhere to guidelines published in the Data Protection Act of 1998 and the General Data Protection Regulation (EU) 2016/679 which is applicable from the 25th May 2018, together with any domestic laws subsequently enacted.

We are notified as a Data Controller with the Office of the Information Commissioner under registration number Z6860509 and we are the Data Controller of any Personal Data that you provide to us.

Our Data Protection Officer, Joyce Wright, HR– Tel: (01450) 364200 Email: [info@waverley-housing.co.uk](mailto:info@waverley-housing.co.uk). Any questions relating to this Notice and our Privacy Policy should be sent to the Data Protection Officer at our registered office address above.

## How we collect information from you and what information we collect

We collect information about you:

- when you or someone on your behalf applies for housing with us, when you become a tenant or other customer, request services/repairs, enter into a factoring agreement or other contractual arrangement with ourselves howsoever arising or you otherwise provide us with your personal details
- from your use of our online services e.g. website contact forms, whether to report any tenancy/factoring related issues, make a complaint, or otherwise in general contact us
- from your arrangements to make payment to us or for us to make payment to you (such as bank details, payment card numbers, employment details, benefit entitlement and Business any other income and expenditure related information).

We collect the following information about you:

- name, address and contact telephone numbers and email address
- Date of Birth
- National Insurance Number

- Personal characteristics such as gender, nationality, ethnic group, disabilities
- Evidence of right to reside required under immigration laws, such as passports, work permits, residency information and other proof of identity, e.g. driving licence
- Medical, anti-social behaviour orders, registered sex offender/ violent offender history
- Rent arrears or other housing-related debts history
- All of the above data which is applicable in relation to household members living with you, e.g. your children, friends or relatives
- Next of Kin or any support person name, address and contact telephone numbers
- Name and job title of anyone who works for Waverley Housing who you are connected to
- Details of any employment history you have had with Waverley Housing
- Bank account details and other financial information.

## We receive the following information from third parties:

- Benefits information, including awards of Housing Benefit/ Universal Credit
- Payments made by you to us
- Complaints or other communications regarding behaviour or other alleged breaches of the terms of your contract with us, including information obtained from Police Scotland, Scottish Borders Community Safety Team or other local authority departments
- Reports as to the conduct or condition of your tenancy, including references from previous tenancies, and complaints of anti-social behaviour
- Any other reports relative to your tenancy with us, e.g. GP, Social Work, Environmental Health or other specialist reports..

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

We need your information and will use your information:

- to undertake and perform our obligations and duties to you in accordance with the terms of our contract or any other arrangement with you
- to enable us to supply you with the services and information which you have requested
- to enable us to respond e.g. to your repair request, housing application, complaints made and any other requests from you
- to enable us to receive payments from you or to make payments to you
- to enable us to provide support with benefit entitlements and other tenancy-related issues
- to enable us to comply with the law in relation to your residency
- to enable us to meet Regulatory standards and to submit reports to our Regulator on e.g. personal characteristics of our tenants and housing applicants



- 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 to our suppliers/contractors which may affect you
- 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.

## Sharing of Your Information

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 are merged with another business entity, your information may be disclosed to our new business partners or owners
- If we instruct repairs, maintenance or improvement works, your information may be disclosed to any supplier of materials or contractor instructed to carry out works
- If we are investigating a complaint, information may be disclosed to Police Scotland, Local Authority departments, Scottish Fire & Rescue Service, other statutory bodies such as the Scottish Public Services Ombudsman and others involved in any complaint, whether investigating the complaint or otherwise
- In processing your housing application, we may require to share information with other housing providers on property sizes, and other third parties in relation to verification of your circumstances on priority award applications
- If we are updating tenancy details, your information may be disclosed to third parties (such as utility companies and Local Authority)

- If we are investigating payments made or otherwise, your information may be disclosed to payment processors, Local Authority and the Department of Work & Pensions
- If we are conducting a survey of our products and/or service, your information may be disclosed to third parties assisting in the compilation and analysis of the survey results
- If we are issuing communications to you, we may provide third parties with your name and address details, e.g. our printers to issue newsletters and other relevant communications on our behalf
- If we are processing credits and refunds we may share your information with Banks Automatic Clearing Services (BACS) for automated payment purposes
- If we require IT support, we may share data with our IT management information system providers, our payroll providers, and our electronic document management providers.

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.

Your information will only be stored within the UK and EEA.

## Security

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

- All data held electronically is password protected, has restricted users access and is stored on a secure on-site server with the exception of emails stored on Microsoft 365 servers hosted in Ireland
- All data is backed-up/restored in accordance with our IT back-up & restoration procedure
- Any hard copy data is held in secured cabinets
- Employee contracts include a confidentiality clause and use of company equipment is as outlined in our Use of Mobile Phones, Electronic Communications and Social Media Policy
- Computer screens are locked when desks are unattended. Data storage and security forms part of our Privacy Policy contained on our website [www.waverley-housing.co.uk/privacy-policy/](http://www.waverley-housing.co.uk/privacy-policy/)

## How long we will keep your information

We review our Data Retention Periods every 3 years 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.

Our Data Retention Periods are referred to in our Privacy Policy and available upon request or from our website [www.waverley-housing.co.uk/privacy-policy/](http://www.waverley-housing.co.uk/privacy-policy/) after which data will be destroyed if it is no longer required for the reasons it was obtained.

## 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 our Data Protection Officer, Joyce Wright, HR on (01450) 364200 or email: [info@waverley-housing.co.uk](mailto:info@waverley-housing.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:

The Information Commissioner's Office – Scotland  
45 Melville Street, Edinburgh, EH3 7HL  
Telephone: 0131 244 9001  
Email: [Scotland@ico.org.uk](mailto:Scotland@ico.org.uk)

**The accuracy of your personal information is important to us - please help us keep our records updated by informing us of any changes to this.**

Waverley Housing reserves the right to amend this Fair Processing Notice at any time, and will notify you of any changes through our website, social media or directly contact you.

We undertake to carry out a 3-yearly review of this Fair Processing Notice.



51 North Bridge Street  
Hawick • TD9 9PX  
T: 01450 364200  
E: [info@waverley-housing.co.uk](mailto:info@waverley-housing.co.uk)  
[www.waverley-housing.co.uk](http://www.waverley-housing.co.uk)

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