



## **West Lothian Housing Register**

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

This notice explains what information we collect, when we collect it and how we use it. In our activities we will process personal data about you (held on paper, electronically, or otherwise) 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.

Almond Housing Association, Weslo Housing Management and West Lothian Council work together to operate the West Lothian Housing Register. This means that you only need to fill in one application form to be listed for all three housing providers. The personal information you provide us with in your application is shared between all three landlords.

### **Who are we?**

Almond Housing Association Ltd., registered with the Scottish Housing Regulator No HAL 285, a registered Scottish Charity No SC031696, a registered society under the Co-operative and Community Benefit Societies Act 2014 with Registered Number 2471R(S) and having their Registered Office at 44 Etive Walk, Craigshill, Livingston EH54 5AB.

Weslo Housing Management is a company limited by guarantee with charitable status having their Registered Office at 64 – 66 North Bridge Street, Bathgate, West Lothian, EH48 4PP. Housing Regulator registration No 361, registered Scottish Charity Number SC021100.

West Lothian Council, a local authority constituted in terms of the Local Government etc. (Scotland) Act 1994 and having their Principal Office at Civic Centre, Howden South Road, Livingston EH54 6FF.

### **Security and Data Protection**

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

If you have any queries about this notice, how we use your personal information, or if you require a copy of this notice in an alternative format (such as large print, Braille or audio

recording), you can write to us at our registered office address (es) above, or on the following details:

Any questions relating to this notice are accessible at:

- Almond Housing Association: [enquiries@almondha.org.uk](mailto:enquiries@almondha.org.uk)
- Weslo Housing Management: [corporate.services@weslohm.co.uk](mailto:corporate.services@weslohm.co.uk)
- West Lothian Council: [dpo@westlothian.gov.uk](mailto:dpo@westlothian.gov.uk)

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

We collect information about you:

- when you apply for housing with us
- from your use of our online services;
- when you take part in an online survey, provide us with your personal details on social media (Facebook and Twitter) or fill in our website contact form;

We collect the following information about you:

- name
- date of birth
- address
- telephone number (landline and mobile)
- e-mail address
- members of your household.

When you apply for housing with us we also collect the following information about you:

- any representative's details
- address history for the last three years
- gender
- marital status
- ethnic origin and language
- immigration status
- details of any disability/ mental health
- household details, including details of any pregnancy
- details of any pets
- any criminal convictions data.

We receive the following information from third parties:

- Benefits information, including awards of Housing Benefit or 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.
- Reports as to the conduct or condition of your tenancy, including references from current or previous tenancies, and complaints of anti-social behaviour.
- Reports covering any health matter identified by you
- If we are updating tenancy details, your information may be disclosed to third parties
- If we are conducting a survey of our services or consultation, your information may be disclosed to third parties assisting in the compilation and analysis of the survey results;

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

We need your information and will use your information:

- to process your housing application and respond to any complaints;
- to co-ordinate the allocation process
- to contact you or send you correspondence regarding your application and any changes to our services that may affect you;
- to contact you for views on our services;
- to enable us to supply you with the services and information which you have requested;
- to analyse the information we collect so that we can administer, support and improve and develop our business and the services we offer;
- for all other purposes consistent with the proper performance of our operations and business;

### **What is our legal basis for using your personal information?**

We will only use your personal information where it is permitted by law and where:

- we need to use your personal information to perform our contract with you;
- we need to use your personal information to comply with our legal or regulatory obligations as a housing association and Local Authority;
- you have given us your consent to use your personal information for a particular purpose (if consent is needed we will ask this from you separately); and
- it is in our legitimate interests to process your personal information (such as our legitimate interests to identify improvements in our services to you, and our legitimate interests to obtain feedback on our services) and there is no disadvantage to you or risk to your personal information.

If you do not provide us with the personal information we request from you, we may not be able to offer you our services, or continue to administer any services that you have with us.

## **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 as set out in our Fair Processing Notices.

- For Almond Housing Association's Fair Processing Notice, see [www.almondha.org.uk](http://www.almondha.org.uk)
- For Weslo Housing Management's Fair Processing Statement, see [www.weslo-housing.org](http://www.weslo-housing.org)
- For West Lothian Council's Fair Processing Notice, see <https://www.westlothian.gov.uk/dataprotectionandprivacy>

Paper copies are available on request.

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**

We do not transfer your personal information outside the UK or EEA.

## **Security**

We take the following measures to ensure any personal information you give us is kept secure:

- We work in secure offices with restricted access.
- We use password protected IT systems and software with restricted access.
- We make regular backups of files.
- We protect ourselves against viruses and malware.
- We have secure systems for paper files.
- We have secure websites.

Further information can be found in:

- Almond Housing Association's Openness & Confidentiality policy, see [www.almondha.org.uk](http://www.almondha.org.uk)
- Weslo Housing Management's Privacy Statement , see [www.weslo-housing.org](http://www.weslo-housing.org)
- West Lothian Council's Privacy Notice, see <https://www.westlothian.gov.uk/dataprotectionandprivacy>

Paper copies are available on request.

## How long we will keep your information

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

For details see Almond Housing Association's Retention of Documents Schedule at , <https://www.almondha.org.uk/information-for-tenants/your-privacy-and-rights/>

Weslo Housing Management's Retention of Documents Schedule is contained within Weslo's Privacy Notice at <https://www.weslo-housing.org/> and

West Lothian Council's Retention of Documents Schedule on <https://www.westlothian.gov.uk/article/4925/Element-05-Retention-Schedules>.

Paper copies are available on request.

## Your rights

You have the right at any time to:

- **Right to object:** You can object to our processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. Please contact us as noted above, providing details of your objection.
- **Access to your personal data:** You can request access to a copy of your personal data that we hold. You can make a request for access free of charge. Please make all requests for access in writing, and provide us with evidence of your identity.
- **Consent:** Where you have given us your consent to use your personal data, you can withdraw your consent at any time.
- **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal data held about you.
- **Erasure:** You can ask us to delete your personal data where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.
- **Portability:** You can ask us to provide you or a third party with some of the personal data that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.
- **Restriction:** You can ask us to restrict the personal data we use about you where you have asked for it to be erased or where you have objected to our use of it

If you would like to exercise any of the above rights please email us at:

- Almond Housing Association: [enquiries@almondha.org.uk](mailto:enquiries@almondha.org.uk)
- Weslo Housing Management: [corporate.services@weslohm.co.uk](mailto:corporate.services@weslohm.co.uk)
- West Lothian Council: [customer.service@westlothian.gov.uk](mailto:customer.service@westlothian.gov.uk)

You also have the right to complain to the Information Commissioner's Office regarding 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 information is important to us - please help us keep our records up to date by letting us know of any changes to your email address, phone number or any other contact details.