



## GDPR Fair Processing Notice

The General Data Protection Regulation (GDPR) is a new EU law that comes into effect on **25th May 2018**, and is the biggest overhaul of data protection legislation in over 25 years. The GDPR will ensure all organisations are more transparent about the personal data they collect and how they will use it.

During the course of our activities we process personal information about you (hard copy, electronically, or otherwise) and we recognise the need to treat it in an appropriate and lawful manner. 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, together with any domestic laws subsequently enacted.

The purpose of this Fair Processing Notice is to make you aware of how we handle your personal information, including:

- » **What** information we collect;
- » **When** we collect it;
- » **How** we will use it;
- » **Who** we share it with; and
- » How we **dispose** of it.



Bield Housing & Care (Scottish Charity Number SC006878) is a registered society under the Co-operative and Community Benefit Societies Act 2014 with Registered Number 1692R (S) and having their Registered Office at 79 Hopetoun Street, Edinburgh, EH7 4QF.

We are notified as a 'Data Controller' with the Information Commissioner's Office under registration number Z5643453, and we are the data controller for any personal information you provide us.

## Information that we hold and how we use it

### We collect information about you:

- » When you apply for housing with us, become a tenant, request services (e.g. care services or repairs), enter in to a factoring agreement with ourselves howsoever arising or otherwise provide us with your personal details;
- » If you are a BR24 customer, calls will be recorded for quality control, training, and to protect staff and service users;
- » When you apply to become a member;
- » From your use of our online services e.g. applying for housing, reporting any tenancy/factor related issues, making a complaint;
- » 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 may collect the following information about you:

- |                                    |  |
|------------------------------------|--|
| » Name                             | » Power of Attorney  |
| » Address                          | » Disability details   |
| » Gender                           | » Health, wellbeing & support details                            |
| » Ethnicity                        | » Housing benefits reference number                              |
| » Date of birth                    | » Identifiable imagery eg CCTV images, photographs for fileplans |
| » Telephone number                 |  |
| » E-mail address                   |  |
| » National Insurance Number        |  |
| » Next of Kin & emergency contacts |  |

## 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.
- » If you are a tenant - reports as to the conduct or condition of your tenancy, including references from previous tenancies, and complaints of anti-social behaviour.
- » If you require a medical adaptation - personal details of person requiring adaptation, confirmation of eligibility for adaptation, and reasons for adaptation.
- » Other agencies working with you to whom you have given consent.

## Why we collect this information and how it will be used:

- » To undertake and perform our obligations and duties to you in accordance with the terms of our contract with you;
- » To enable us to supply you with the services and information which you have requested;
- » To enable us to respond to your repair request, application for housing or care services 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 to our suppliers or services 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. 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 merged with another business entity, your information may be disclosed to our new business partners or owners;
- » If we instruct repair or maintenance works or medical adaptations, your information may be disclosed to any contractor;
- » If we are investigating a complaint, information may be disclosed to Police Scotland, Local Authority departments, Scottish Fire & Rescue Service and others involved in any complaint, whether investigating the complaint or otherwise;
- » 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 obliged to provide your personal information for the purposes of regulation e.g. the Care Inspectorate;
- » Your details may be shared with National TV Licensing Authority;
- » In the event of an emergency, your details may be shared with an emergency service, NHS, care and support services;
- » We may share your details with our solicitors and auditors;
- » 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;
- » Other agencies working with you to whom you have given consent.

**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 and EEA.

## Security

When you give us information we take steps to make sure that your personal information is kept secure and safe, and in accordance with Bield Housing & Care Data Protection Policy. All of our systems are password protected and all paper copies are stored in locked cabinets.

## How long we will keep your information

We review our data retention periods regularly and will only hold your personal information 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.

## Your Rights

You have the right at any time to:

- » ask for a copy of all personal information we hold on you;
- » request we correct any inaccuracies in your personal information;
- » request us to delete your personal information; and
- » object to receiving any marketing communications from us.

If you would like to exercise any of your rights above or have any queries regarding our data protection practices, please contact our Data Protection Officer, Verity Jerrit, on 0131 273 4000 or email [dataprotection@bield.co.uk](mailto:dataprotection@bield.co.uk)

If you are unhappy with how we handle your personal information, you have the right to complain to the Information Commissioner's Office.

Their details are:

The Information Commissioner's Office – Scotland  
45 Melville Street, Edinburgh, EH3 7HL  
Telephone: 0303 123 1115  
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 updated by informing us  
of any changes to your email address and other contact  
details.**