ARDENGLEN



TENANTS AND OWNERS PRIVACY NOTICE

Ardenglen Housing Association Ltd, a Scottish Charity (Scottish Charity Number SC032542), a registered society under the Co-operative and Community Benefit Societies Act 2014 with Registered Number 2339R(S) and having their Registered Office at 355 Tormusk Road, Glasgow, G45 0HF.

We take the issue of security and data protection very seriously and strictly adhere to data protection legislation. We are notified as a Data Controller with the Office of the Information Commissioner under registration number Z5937922 and we are the data controller of any personal data that y
ou provide to us. Our Data Protection Officer is RGDP LLP. Any questions relating to this notice and our privacy practices should be sent to 355 Tormusk Road, Glasgow, G45 0HF or emailed to dataprotection@ardenglen.org.uk

How we use your personal data

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.

Introduction

The purpose of this Privacy Notice is to explain to you the reasons which we process your personal data and explain your rights under the current data protection laws.
We collect and process personal data relating to you to manage our relationship with you. We are committed to being transparent about how we collect and use your data, and to meeting our data protection obligations in respect of your personal data.

This Privacy Notice applies to tenants and owners whose data is processed by Ardenglen Housing Association.

This Privacy Notice may be amended at any time. Any revisions will be published on the AHA Housing Association website.

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.

Please note that we have separate privacy notices for staff, committee / board members and our website, and you should refer to these separate Privacy Notices for more information about how we process your personal data if you fall within any of these categories.

Who are we?

Ardenglen Housing Association are registered as data controllers with the Information Commissioner's Office with registration number Z5937922.

Ardenglen Housing Association takes the issue of security and data protection very seriously, including compliance with data protection laws, including the UK General Data Protection Regulation, the Data Protection Act 2018, the Data (Use and Access) Act 2025 and the Privacy and Electronic Regulations.

Where does your personal information come from?

We collect information about you:

- when you apply for housing with us, become a tenant, request services/ repairs, enter into a factoring agreement with ourselves howsoever arising or otherwise provide us with your personal details
- when you apply to become a member;
- from your use of our online services, whether to report any tenancy/ factor related issues, make a complaint or otherwise;
- 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); and
- CCTV imagery.

What Information do we collect?

Ardenglen Housing Association controls and processes a range of information about you. In this privacy notice 'your personal information' means your personal data i.e. information about you from which you can be identified. Your 'personal information' does not include data where your identity has been removed (anonymous data). It is really important that your personal information that we hold and process is accurate and up to date. Please keep us informed if your personal information changes during your engagement with us.

We may collect the following information about you:

- name;
- address;
- telephone number;
- e-mail address;
- National Insurance Number;
- Next of Kin;
- Date of birth;
- Marital Status;
- CCTV imagery;
- Telephone call recordings;
- Protected characteristics data, as defined by the Equality Act 2010;
- Health Information relevant to application or tenancy ;
- Employment details;
- Signature
- Criminal convictions
- Household composition
- Server logs on our website;
- Cookies to log user preferences;
- Financial information, such as your national insurance number, housing benefit numbers and bank details
- Tenancy Details: start and end dates, rent paid, under/over payments, arrears
- Payment details: bank account details, 3rd party payment details
- Repairs: repairs requested, access details, completion dates
- Shareholding membership number
- Purchase details: solicitors details
- Employment: benefit/council tax status and payments, employment history, education
- history, tax code, trade union membership
- Employment application details, asylum status, criminal record declaration
- Location: IP (internet protocol) address when you access our website
- Images: photo identification and CCTV images

We may also record factual information whenever you contact us or use our services, as well as information about other action we take, so that we have an accurate record of what

happened.

What Information do we collect? Cont.

We may receive the following information from third parties:

- Benefits information, including awards of Housing Benefit/Universal Credit;
- Payments made by you to us;
- Solicitors / professional advisors;
- Governmental agencies and bodies;
- Medical information by health providers;
- Referrals;
- Local authorities
- Complaints or other communications regarding behaviour or other alleged breaches of the terms of your contract with us, including information obtained from Police Scotland, Social Services and/or Local Authorities;
- Reports as to the conduct or condition of your tenancy, including references from previous tenancies, and complaints of anti-social behaviour
- Tracing and Employment details from debt collection agencies;
- Title Deeds
- Contractors and suppliers who have undertaken works on our behalf
- Legal advisors
- Heath professionals
- Local Authorities
- Charities
- MPs, MSPs and councillors
- Other registered social landlords
- Utility companies
- Household members

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 with you;
- Enable us to supply you with the services and information that you have requested;
- Enable us to respond to your repair request, housing application and complaints made;
- Analyse the information we collect so that we can administer, support, improve and develop our business and the services we offer;
- Contact you in order to send you details of any changes to our or suppliers that may affect you;
- Progress all other purposes consistent with the proper performance of our operations and business; and
- Contact you for your views on our products and services.

Sharing of Your Information

We may disclose your personal data to any of our employees, officers, contractors, insurers, professional advisors, agents, suppliers or subcontractors, utility companies, government agencies and regulators, local councils and healthcare providers insofar as reasonably necessary, and in accordance with data protection legislation.

We may also disclose your personal data:

- If we enter into a joint venture with or merge with another business entity, your information may be disclosed to our new business partners or owners;
- If we instruct repair or maintenance works, your information may be disclosed to any contractor;
- If we are investigating a complaint, information may be disclosed to Police Scotland, Local Authority / Council and/or Council 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 / Council and/or Council departments);
- If we are investigating payments made or otherwise, your information may be disclosed to payment processors, Local Authority / Council and/or Council Departments and the Department of Work & Pensions;
- We may share details with our Data Protection Team and/or Legal Advisors
- 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 you are using an advice or advocacy service (such as a solicitor, advice agency or the welfare benefits advisor) we will share relevant information with them where it is necessary to progress your case.
- If you request that we share your information with other RSLs who may assist in re-housing you.
- If your household is threatened with homelessness, your information may be shared between us and Local Health Authority and Social Care Partnership(s).
- If we are pursuing debts associated with a tenancy or a former tenancy we may share your basic information with a third party agency to assist in the recovery of those debts;
- If we are making an insurance claim following an incident we may share your information with our insurers.
- If we are being audited then we may share your information with our auditors.
- Where there is a legal action that involves you such as action to recover a tenancy your information may be shared with a solicitor to assist in the legal process.
- To fulfil our legal and regulatory obligations to bodies such as the Scottish Housing Regulator, Financial Conduct Authority or the Office of the Scottish Charity Regulator.
- If requested by an emergency service.
- With your consent.
- As otherwise required by law.

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 recordings, newsletters, rent arrears predictions, surveys, data sharing with utility companies,void property management and recognised legitimate interests in accordance with the Data (Use and Access) Act 2025)
- vital interests
- tasks carried out in the public interest or with official authority
- legal obligation

Processing Special Category Personal Data

Special categories of information 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. There are specific legal reasons for processing this special data.

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.

We will process special category personal data where lawful.

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

We do not carry out any automated decisions regarding you.

If you would like to exercise any of your rights above, please contact us on 0141 634 8016 or dataprotection@ardenglen.org.uk

Where do we keep your data?

Your information will only be processed within the UK except where international transfers are authorised by law by virtue of Chapter V of the UK GDPR.

How do we keep your data safe?

When you give us information, we take steps to make sure that your personal information is kept secure and safe. All personal data is process in accordance with Ardenglen Housing Association's data protection policies and procedures. Our systems are password protected and all electronic data is stored securely. All paper files are kept in locked cabinets.

How long do we keep your personal information for?

We will 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 or in accordance with best practice.

If you do not wish to provide your personal data

You have obligations under your contract / potential contract with us to provide the organisation with the certain personal data. If you do not wish to provide the requested data you may not be able to enter into a contract with us. If you have any queries regarding this, please contact the Data Protection Lead, for further information.

Queries and Complaints

Ardenglen Housing Association, has appointed a Data Protection Officer (DPO). Our DPO is provided by RGDP LLP, who can be contacted either by phone on 0131 222 3239or by email: info@rgdp.co.uk

Any questions relating to this notice and our data protection compliance should be sent, in the first instance, to the Data Protection Lead, by email: dataprotection@ardenglen.org.uk.

You 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: Make a complaint | ICO

The accuracy of your information is important to us; please help us keep our records updated by informing us of any changes to your personal and contact details.

Updated:

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