



Privacy Notice:  
Tenants



# Key Housing Association Limited

## Privacy Notice – Tenants

### (How we process 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 process your personal data.

### Introduction

The purpose of this privacy notice is to explain to you the reasons which we may hold and use your personal data and explain your rights under the current data protection laws. As an employer or contractor, we may collect and process personal data relating to you to manage a contract with you. We are committed to being transparent about how we collect and use your data, and to meeting our data protection obligations with you. This notice does not form part of any contract of employment or engagement with us. It applies to all our employees, workers, volunteers, and consultants, including applicants, regardless of length of service, and may be amended at any time. If any amendments are required in the future, we will notify you as is appropriate.

### Who are we?

Key Housing Association is a Scottish Charity. We are notified as a Data Controller with the Office of the Information Commissioner under registration number Z5659071.

Our Registered Office is at The Square, 70 Renton Street, Glasgow, G4 0HT. Key Housing Association (“we” or “us”) take the issue of security and data protection very seriously. We comply with all relevant data protection laws, including the UK General Data Protection Regulation, the UK Data Protection Act 2018 and the Privacy and Electronic Communications Regulations.

We are notified as a Data Controller with the Office of the Information Commissioner under registration numbers Z5659071 and we are the data controller of any personal data that you provide to us.

Our Data Protection Lead for both Key Housing Association and Community Lifestyles (“we”, “our” or “us”) is the Director of People and Organisational Development. Our Data Protection Officer (DPO) is RGDP LLP, who can be contacted either by phone on 0131 222 3239 or by email: [info@rgdp.co.uk](mailto:info@rgdp.co.uk)

Any questions relating to this notice and our privacy practices should be sent to the following email addresses: [dataprotection@key.org.uk](mailto:dataprotection@key.org.uk) or [info@rgdp.co.uk](mailto:info@rgdp.co.uk)  
Alternatively, you can contact us by writing to us at our Registered Office.

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

We collect information about you from:

- Housing Applications;
- Tenancy sign up documents;
- Tenancy Management Correspondence;
- Repair Requests;
- Membership of the Association, and;
- Any financial transactions including benefit entitlements, and or any income and expenditure related information.

## We collect the following information about you and your household:

- Name;
- Address;
- Gender;
- Date of Birth;
- Telephone numbers;
- Email addresses;
- National insurance number;
- Signature;
- Information about medical or health conditions;
- Next of kin, welfare and financial guardians, emergency contact details;
- Household members;
- Protected characteristics under the Equality Act 2010, including age disability, gender reassignment, marriage and civil partnerships, pregnancy and maternity, race, religion or belief, sex, and sexual orientation, should you be asked, and wish, to provide this information;
- Housing Benefit reference number;
- Bank account details, and;
- Your image from CCTV We receive the following information from third parties: Benefits information, including awards of Housing Benefit/Universal Credit;
- Payments made by you via bank transfer, post office or any other methods;
- Complaints or other communications regarding behaviour or other alleged breaches of the terms of your contract with us, including information obtained from Police Scotland and / or Local Authorities;
- Reports as to the conduct or condition of your tenancy, including references from previous landlords;
- Information supplied by the relevant local authority – Housing/social work with regards to a housing application or nomination;
- Medical reports for medical adaptations and social work reports, and;
- Tracing and employment details from debt collection agencies.

We may collect this information in a variety of ways. For example, we may collect it from:

- You directly;
- Members of your family or a legal representative if you have one;
- Your Care Manager;
- Your doctor or other professionals who know about your health;
- Your bank;

- Legal advisors;
- Local Authorities;
- Charities, and;
- MPS, MSPs and councillors.

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.

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

We need your information and will use your information

- To enable us to enter into a contract with you
- To undertake and perform our obligations and duties in accordance with the terms of our contract with you or other legal / regulatory requirements
- To enable us to respond to your repair requests, medical adaptation requests, housing applications/nominations or complaints
- To use the information so we can administer, support and improve our business and the services we offer
- To keep tenants updated on any changes to our services, including changes of suppliers
- For all other purposes consistent with the proper performance of our operations and business, including newsletters, website and annual report
- To request views on our services e.g. Tenant Satisfaction Survey.

## **Sharing of Your Information**

We may disclose your personal data to any of our employees, officers, contractors, insurers, professional advisors, agents, suppliers or subcontractors and trusted third parties insofar as reasonably necessary, and in accordance with data protection law, including the following:

- 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 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 instruct repair or maintenance works, your information may be disclosed to our contractors e.g. name, address and contact details;
- With our Data Protection Team and/or Legal Advisors;
- If we are updating tenancy details your information may be disclosed to third parties (such as utility companies and Local Authorities);
- If we are investigating payments made or otherwise, your information may be disclosed to payment processors, Local Authority and the Department of Work and Pensions;
- 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 utility companies are pursuing outstanding debt, we may share your details with them or debt collection agencies acting on their behalf;
- 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 otherwise) 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 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;
- 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;
- To conduct our day-to-day management of your agreement or potential agreement with us; With your consent; and/or
- As otherwise required by law. 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.

## **What are the lawful 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 the recording of CCTV imagery)
- Vital interests
- The performance of a task carried out in the public interest and / or with official authority
- Legal obligation.

## **Special categories of personal data**

Special categories of personal data means information about your racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; Page 5 of 6 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.

## **Transfers outside the UK**

Your information will only be processed within the UK and the EEA, except where international transfers are authorised by law.

## **Security**

When we process your personal data, we take steps to make sure that your personal information is kept secure and safe. This includes ensuring there is adequate IT and physical security for all locations that data is stored, and we ensure that these measures are tested on a regular basis to ensure compliance. All information is kept in line with our Information, Communication and Technologies Policy and our data protection policies and procedures, which are available on our website or from reception. Our systems are password protected and all electronic data is stored securely. All paper files are kept in locked cabinets.

## How long we will keep your information

We review our data retention periods regularly and will only hold your personal data for as long as it is needed to provide your tenancy, or as required by law/best practice and in accordance with our Data Protection policies and procedures or as set out in any relevant contract we have with you.

Our full retention guidelines are available on our website, or a copy can be requested from our registered office.

## Your rights

You have the right at any time to request us 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.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. If you would like to exercise any of your rights above, please use the contact details below.

## Queries and Complaints

Any questions relating to this notice and our privacy practices should be directed, in the first instance, to [dataprotection@key.org.uk](mailto:dataprotection@key.org.uk) or by post to:

Key Housing Association/Community Lifestyles  
The Square  
70 Renton Street  
Glasgow  
G4 0HT

Please mark your email or letter for the attention of the Director of People and Organisational Development/Data Protection Manager who will respond to your request and make every effort to, answer your queries or resolve any concerns you have.

Alternatively, you can contact our Data Protection Officer, who is provided by RGDP LLP and can be contacted either via 0131 222 3239 or [info@rgdp.co.uk](mailto:info@rgdp.co.uk)

Please also copy us in at: [dataprotection@key.org.uk](mailto:dataprotection@key.org.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: [Make a complaint | ICO](#)

This Privacy Notice was last updated on 1 May 2024