



Privacy Notice:
Website Users, Suppliers,
Contractors & Other Business
Contacts



Key Housing Association Limited and Community Lifestyles Ltd Privacy Notice – Website Users, Suppliers, Contractors & Other Business Contacts

(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.

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. We are also a society registered under the Co-operative and Community Benefit Societies Act 2014, company number 1938 R (S)

Community Lifestyles is a subsidiary company of Key Housing Association and a Scottish Charity (Scottish Charity Number SC028041). We are notified as a Data Controller with the Office of the Information Commissioner under registration number Z4948684. Both of our registered offices are at The Square, 70 Renton Street, Glasgow, G4 0HT. Key Housing Association and Community Lifestyles 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 Data Protection Act 2018 and the Privacy and Electronic Communications Regulations.

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

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

Who this policy covers

This policy outlines the kinds of data we collect when people contact us. This could be because you:

- Have visited our website;
- Are supported by us;
- Are a tenant, or have applied to become a tenant;
- Have applied to become a member of our organisation;
- Have applied for a job with us;
- Have subscribed to our website services, email notifications and/or newsletters; or
- Have emailed us in relation to maintenance, repairs, complaints, or any other purpose.

Website Users

When you visit our website, we may collect some personal information from you. This will be to help us deal with your request or enquiry. The information will have been collected through any online form you have completed. We may also collect this information if you contact us by email, telephone or by another means, including our online web forms, this could include:

- Name
- Contact Details, including phone numbers, addresses and email addresses;
- IP (Internet Protocol) Address.

We may also collect information about your activity while you use the website or if you share any of its content by clicking the social media buttons. If you have not disabled cookies while visiting our website, the kind of technical information we may collect could include:

- IP address;
- The browser type and version;
- Time zone setting;
- Browser plug-in types and versions;
- Operating system and platform;
- The clicks you made through our website, including full URL (Uniform Resource Locators);
- The pages you viewed or searched for;
- Page response times;
- Download errors;
- Page interaction information;
- Methods used to browse away from the page and;
- Any phone number used to contact us.

Supported People, Tenants, and Job Applicants

If you receive support from us, live in one of our houses, or apply to work with us, we may collect the following information about you:

- Name;
- Contact Details, including phone numbers, addresses and email addresses;
- Date of Birth;
- National Insurance Number;
- Employment & Education Details;
- Protected Characteristics Data, as defined by the Equality Act 2010;
- Previous Addresses;
- Health & Medical Details; and
- Criminal convictions.

Suppliers, contractors, and other business contacts

We collect the following information:

- Name;
- Contact details, including phone numbers, addresses and email addresses (normally these will be your work details where you are acting in a professional capacity);
- References;
- Bank Details (normally of your business); and
- CCTV imagery.

We collect this information when you:

- complete and submit a “contact us” form on our website;
- submit tender submissions and contract documents;
- communicate with us via email, telephone, or social media; and
- visit our premises.

We may also receive your personal information from other third parties, such as a referral. Please note that our website uses Cookies. You can change your Cookies setting using the ‘Cookies Setting’ tool and review our cookies usage within our Cookie Notice.

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

Depending on your relationship with us, we will use your information to:

- provide you with the services that you have requested from us; communicate with you, including in response to any of your enquiries;
- improve our services and respond to changing needs;
- process your rent payments;
- carry out repairs to your property;
- handle and resolve complaints made by, or, against you;
- keep the personal information that we hold about you accurate and up to date (if you provide any new personal information to us via the website);
- signpost you to organisations that can offer benefits and debt advice and support.
- potentially enter into or enter into a contract with you and for the administration of our organisation; and
- communicate with you in relation to any contract / request.

If you do not wish to provide your personal data

If you have a contract/potential contract with us, you have obligations under your contract / potential contract to provide us with the necessary data. If you do not provide this information, this may prevent the Association’s ability to enter into or maintain a contract with you.

Sharing of Your Information

We may disclose your personal data to any of our employees, officers, contractors, insurers, professional advisors, agents, suppliers or subcontractors, selected third parties, government agencies and regulators and healthcare providers so far as reasonably necessary, and in accordance with data protection legislation. We may also disclose your personal data:

- To protect the rights, property and safety of us, our tenants, supported people or employees; users of our website and other persons; with our Data Protection Team and/or Legal Advisors;
- 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;
- In connection with any ongoing or prospective proceedings;
- If we are investigating a complaint, information may be disclosed to solicitors, independent investigators, including auditors, the Scottish Housing Regulator; Care Inspectorate, SSSC and other regulatory bodies, whether investigating the complaint or otherwise; to the purchaser (or prospective purchaser) of any business or asset that we are, or are contemplating, selling;
- 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;
- To organisations providing benefits advice and support;
- To Police Scotland and the local authority in relation to complaints involving anti-social or other criminal behaviour;
- 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 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
- Vital interests public interest / official authority
- Where we have a legal obligation to do so;
- And within our legitimate interests, including CCTV monitoring and business tenders.

Special categories of 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.

The special categories of 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.

Sharing of Your Information

We may disclose your personal data to any of our employees, officers, contractors, insurers, professional advisors, agents, suppliers or subcontractors, selected third parties, government agencies and regulators and healthcare providers so far as reasonably necessary, and in accordance with data protection legislation. We may also disclose your personal data:

- To protect the rights, property and safety of us, our tenants, supported people or employees; users of our website and other persons; with our Data Protection Team and/or Legal Advisors;
- 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;
- In connection with any ongoing or prospective proceedings;
- If we are investigating a complaint, information may be disclosed to solicitors, independent investigators, including auditors, the Scottish Housing Regulator; Care Inspectorate, SSSC and other regulatory bodies, whether investigating the complaint or otherwise; to the purchaser (or prospective purchaser) of any business or asset that we are, or are contemplating, selling;
- 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;
- To organisations providing benefits advice and support;
- To Police Scotland and the local authority in relation to complaints involving anti-social or other criminal behaviour;
- 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 legal bases for us processing your personal data?

We will only process your personal data on one or more of the following legal bases:

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Our legal bases for processing your special category data is:

- (a) Explicit consent;
- (b) Employment, social security and social protection (if authorised by law);
- (c) Vital interests;
- (d) Not-for-profit bodies;
- (e) Made public by the data subject;
- (f) Legal claims or judicial acts;
- (g) Reasons of substantial public interest (with a basis in law);
- (h) Health or social care (with a basis in law);
- (i) Public health (with a basis in law); and
- (j) Archiving, research, and statistics (with a basis in law).

Transfers outside the UK

Your information will only be processed within the UK, 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 our offices.

Our systems are password protected and all electronic data is stored securely. All paper files are kept in locked cabinets.

How long will we keep your personal information?

We 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 and in accordance with our Data Retention Policy and Schedule.

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; and
- 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 Concerns

If you have any queries or concerns about this notice or our use of your personal information, you can raise these with us by either contacting:

Key Housing Association: dataprotection@key.org.uk
DPO (RGDP LLP): info@rgdp.co.uk or 0131 222 3239

Or by post to:
Key/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.

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](#)

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.

This Privacy Notice was last updated on 3 May 2024.