



Privacy Notice:  
Supported People



# Key Housing Association Limited and Community Lifestyles Ltd Privacy Notice – Supported People

## (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. 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 numbers Z4948684 and we are the data controller of any personal data that you provide to us. Our Registered Office is at The Square, 70 Renton Street, Glasgow, G4 0HT. Key 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](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

Depending on the type of support you want us to provide, we may gather a wide range of information about you, some of it being very personal information. This could include:

- Personal details such as your name, address, date of birth, National Insurance number, and signature;
- Information about medical or health conditions, allergies, and your level of mobility, to ensure your safety and wellbeing;
- Any medication you take, if you wish support with taking medication or ordering it;

- Information about your diet and your level of fitness;
- Information about any hobbies or other interests you have, if you wish support to explore leisure activities and opportunities to be part of your community;
- Your cultural or religious beliefs;
- Your race;
- Your sex and sexual orientation;
- Your marital status;
- Your political views;
- Details of your bank account, if you have asked us to support you with paying bills or with budgeting;
- Information about your next of kin and emergency contacts;
- Your carers' details;
- Certain criminal offence information, to keep you and other people safe, and;
- Your image from CCTV,

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;
- Commissioning Local Authorities or NHS Boards;
- Charities;
- MPS, MSPs and councillors.

The information might be collected through the process of completing your support plan with you or your representative, from correspondence with other people; or through meetings with you or other people.

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. Your information will be kept in a range of different places including in your own home, in our office, in our database and in other IT systems.

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

We need your information and will use your information:

- To enter into a formal agreement with you to provide you with the type of support you have told us you want and to achieve the outcomes you want in your life;
- To enable us to respond to any 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 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

We may disclose your personal data within the organisation for example to the Finance team, or the Training section, but people will only see the information they need to so that they can do their jobs.

We may need to share your data with other organisations such as Social Work, Doctors or other health staff, to ensure your support needs are met, 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. In some circumstances, we may also be legally required to share your information with our regulators the Care Inspectorate and the Scottish Social Services Council.

We may disclose your personal data to any of our employees, officers, contractors, insurers, professional advisors, agents, suppliers or subcontractors 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 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;
- 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 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 Registered Social Landlords who may assist in re-housing you;
- If your household is threatened with homelessness, your information may be shared between us and Local NHS Board and/or Health 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 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, namely processing CCTV imagery and next of kin details;
- Vital interests;
- The performance of a task carried out in the public interest and / or with official authority; and/or
- 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; 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, 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 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 support, 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 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