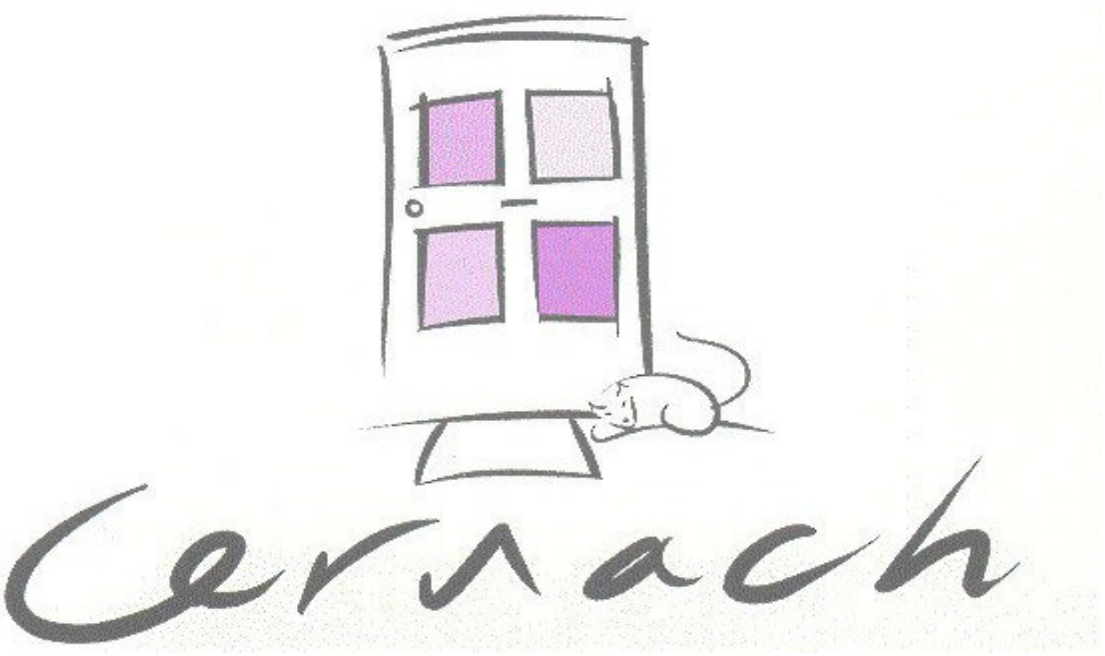


CUSTOMER PRIVACY NOTICE

(How we use your personal data)

Date adopted: October 2025

1. Introduction

1.1 This notice explains what personal data 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.

1.2 Who are we?

1.2.1 **Cernach Housing Association**, registered as: a Scottish Charity (Scottish Charity Number SCO36607), a registered society under the Co-operative and Community Benefit Societies Act 2014 with Registered Number HAC 230, and the Financial Services Agency with Registered Number 2374 R(S)

Our Registered Office is at: **Marion McDonald House 79 Airgold Drive, Glasgow, G15 7AJ**

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

We are notified as a Data Controller with the Office of the Information Commissioner under registration number **Z5533599** and we are the data controller of any personal data that you provide to us.

2. How we collect information from you and what information we collect

2.1 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);
- when you visit our premises (CCTV imagery);
- when you call us or receive a call from us (telephone call recordings); and
- when you are a member of a scrutiny panel.

2.2 We may collect the following information about you:

- Personal details: name, addresses, date of birth
- Contact details: home phone number, mobile phone number and email address
- Further details: NI number, gender, ethnicity, disability, medical details, marital status, signature, unacceptable behaviour warnings, criminal activity
- Household composition: details of existing accommodation arrangements and family members seeking accommodation with the applicant
- 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
- Share 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 address when you access our website
- Images: photo identification and CCTV images

2.3 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.

2.4 We may 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, 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
- Medical reports for medical adaptations and Social Work reports for applications.
- Tracing and Employment details from debt collection agencies.
- Title Deeds
- Contractors and suppliers who have undertaken work on our behalf
- Legal advisors
- Heath professionals
- Local Authorities
- Charities

- MPs, MSPs and councillors
- Other registered social landlords
- Utility companies
- Household members

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

3.1 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.

4. Sharing of your information

4.1 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, trusted third parties and healthcare providers insofar as reasonably necessary, and in accordance with data protection legislation.

4.2 We may also disclose your personal data:

- With your consent.
- To the extent that we are required to do so by law.
- To complete any regulatory returns
- To protect the rights, property and safety of us, our customers, users of our websites and other persons.
- In connection with any ongoing or prospective legal proceedings.
- If we are investigating a complaint, information may be disclosed to solicitors, or otherwise;
- To the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling.
- To another organisation if we enter into a joint venture or merge with another organisations.

5. What are the legal bases for us processing your personal data?

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

- contract
- consent
- our legitimate interests (including CCTV recordings, void property management, next of kin newsletters, data sharing with utility providers, debt recovery from former tenants and recognized legitimate interests in accordance with the Data (Use and Access) Act 2025)
- vital interests
- the performance of a task carried out in the public interest and / or with official authority
- legal obligation

5.2 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.

6. Security

6.1 When you give us information, we take steps to make sure that your personal information is kept secure and safe. All information is processed in accordance with our data protection policies and procedures.

6.2 We will not usually retain your payment details unless you make payments to us using Direct Debit.

6.3 Our computer systems are located in our main office, however our staff may occasionally use laptops, tablet or other devices offsite, i.e., for homeworking. In instances where devices are used remotely this will be secure and under strict control at all times.

6.4 Additionally, we have the following controls in place to ensure the security of your personal information:

- All paper-based records are securely locked in storage cupboards when not actively being Used.
- Our offices are protected by an alarm system, a security company and are

monitored by CCTV.

- All Cernach Housing Association computer servers are within a secure network
- Systems are password protected, patch updates to our servers are implemented and we regularly review system access rights.
- All electronic communication takes place within this secure environment.

6.5 The unauthorised use of IT systems is prevented by:

- User ID
- Lock screen with password activation
- Multi factor authentication

7. How long we will keep your information

7.1 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 (we may be legally required to hold some types of information), or as set out in any relevant contract we have with you.

7.2 We will generally keep your information for periods as recommended by law. Once the periods have expired, the information will be destroyed if it is no longer required for the reasons it was obtained.

7.3 Our full retention schedule is available by contacting the office on 0141 944 3860, emailing us at admin@cernachha.co.uk or from the website: www.cernachha.co.uk/

8. Your Rights

8.1 You have the right at any time 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

9 Transfers outside the UK

Your information will only be stored within the UK except where international transfers are authorised by law.

10. Queries and Complaints

10.1 Any questions relating to this notice and our privacy practices should be directed, in the first instance, to dpo@cernachha.co.uk or by telephoning 0141 944 3860.

10.2 Our Data Protection Officer is provided by RGDP LLP and can be contacted by email: info@rgdp.co.uk

10.3 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

10.4 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.