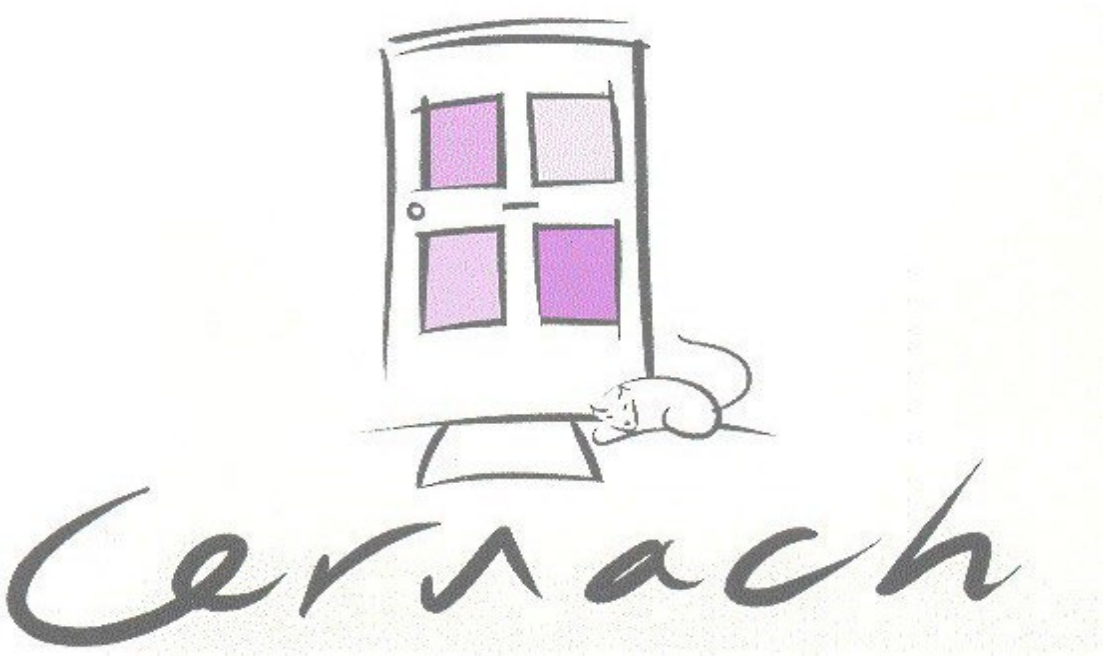


Welfare Rights Privacy Notice

(How we use your personal data)

Date adopted: October 2026

1. Introduction

1.1 Cernach Welfare Rights and Money Advice Service process personal data as part of our normal operational activities. This notice explains what information we collect, when we collect it and how we use this. The personal data we may process may be held on paper, electronically, or otherwise 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?
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 at: **Marion McDonald House 79 Airgold Drive, Glasgow, G15 7AJ**.

1.3 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.

1.4 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 need to collect and use your personal data in order to allow us to provide the Welfare Rights or Money Advice service to you that you have requested from us. We collect and process your personal data to allow us to:

- Provide you with the service that you have requested from us.
- Provide you with advice and information relating to benefit entitlement, medical assessments, claimant commitment, benefit sanctions, welfare reforms
- Provide you with advice and information relating to debt solution options available to you and assist you to access them.
- Assess your capability to repay debts you have.
- Contact creditors on your behalf to negotiate and agree acceptable repayment arrangements
- Assess your eligibility or entitlement to social security and other state benefits and to assist you to make a claim for them.
- Assess your eligibility or entitlement to the Scottish Welfare Fund and other non-statutory benefits or grants and to assist you to make a claim or an application for them.
- Assist with making Mandatory Reconsiderations on a benefit decision that

affects you.
- Provide you with representation at appeal tribunals
- Contact you to update you about any changes to the welfare benefits system or debt legislation that may affect you.
- Monitor the effectiveness of our service and to make improvements to it where necessary.
- Ensure we are meeting our statutory and regulatory obligations and any contractual obligations with our funders.
- And for purposes consistent with the proper performance of our operations and business.
- Images: photo identification and CCTV images
- Telephone call recordings

2.2 We may collect the following information about you:

- Your personal details: name, address, date of birth.
- Your contact details: home telephone number, mobile phone number and email address;
- Your National Insurance Number
- Your financial circumstances including details of your income and savings
- Other details: including information about your gender, ethnicity, disability and marital status.
- Bank account details
- Any Medical information which may be necessary to your case.
- Information about the composition of your Household including details of existing accommodation arrangements and individual(s) who may seeking accommodation with an applicant.
- Any of the above details relating to a spouse or partner
- Location: IP address when you access our website
- Images: photo identification and CCTV images
- Telephone call recordings

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;
- Reports as to the conduct or condition of your tenancy, including references from previous tenancies, and complaints of anti-social behaviour;
- Claims or awards of non-statutory benefits or grants;
- Heath professionals;
- Local Authorities;
- Charities;
- MPs, MSPs and councillors;
- Other registered social landlords;

- Utility companies; and
- 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 agreement 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, trusted third parties, government agencies and regulators, local councils 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, independent investigators such as auditors, the Scottish Housing Regulator and other regulatory body involved in any complaint, whether investigating the complaint 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 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, newsletters and recognised 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 Policy and 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 admin@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 at 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.