General Data Protection Regulations (GDPR)

We know it's important to keep your data safe and follow the data protection rules in the General Data Protection Regulations.

GDPR requires us to tell you more about what we do with the information we have about you.

In order to provide factoring services to you, we hold and use the personal information you give us.

We only ask for personal information we need to meet our legal duties as your Factor.

We use your information for many purposes including providing you with services and communicating with you.

We only keep your personal information for as long as we have to.

We only share your information when we need to, like with Contractors that carry out repairs.

You have the right to ask us what information we have about you and have it deleted if we have no reason to keep it.

It is important you let us know if any information we hold is incorrect, and inform us of any changes to your personal information, like a new phone number or e-mail address.

You can also access our full data protection privacy notice at our website www.milnbank.org.uk

FAIR PROCESSING NOTICE

This notice explains what information we collect, when we collect it and how we use it. During 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 handle your information.

The information contained in this document relates to the services provided to both Milnbank Housing Association (MHA) and Milnbank Property Services (MPS) customers, therefore reference to MHA will also apply to relevant MPS services.

WHO ARE WE?

Milnbank Property Services (MPS) is wholly owned subsidiary of Milnbank Housing Association (MHA) and is a registered Private Limited Company (Property Factor Registration Number: PF000368 and VAT Registration Number: 927 4845 89). Our Registered Office is at 53 Ballindalloch Drive, Dennistoun, Glasgow, G31 3DQ.

MPS takes the issue of security and data protection very seriously and strictly adheres to guidelines published in the Data Protection Act 2018 (the 2018 Act), the UK GDPR and the General Data Protection Regulation (EU) together with any domestic laws subsequently enacted.

We are registered as a Data Controller with the Office of the Information Commissioner (ICO) under registration number Z627136X and we are the data controller of any personal data that you provide to us.

Our Data Protection Officer is Craig Boyle. Any questions relating to this notice and our privacy practices should be sent to admin@milnbank.org.uk or telephone 0141-551-8131

HOW WE COLLECT INFORMATION FROM YOU AND WHAT INFORMATION WE COLLECT

We collect information about you to enable us to perform our contractual obligations. This information may be obtained through a variety of resources including i) directly from you; or ii) via third parties (including employment agencies and pension services). You are under a contractual obligation to provide the data requested from you to enable performance of the contract (i.e. the tenancy agreement to which you are party), in the following circumstances:

- when you: apply for housing with MHA; become a tenant; request our services; request a repairs service; or enter into a factoring agreement.
- when you use of our online services, whether to report any tenancy or factor related issues, make a complaint or otherwise.
- when you make payment to us (which may require providing certain details including bank details, card numbers, employment details, benefit entitlement and any other income and expenditure related information.

Under the terms of the tenancy agreement, you will also require to provide the following information:

- your name.
- your address.
- your telephone number.
- your e-mail address.
- your National Insurance Number.
- your next of Kin.
- details of any dependents.
- relevant financial information (e.g. bank details, income details)
- your ethnic origin (this is classified as “Sensitive Personal Data”)
- any relevant details related to medical conditions/disabilities (this is classified as “Sensitive Personal Data”)

We may also 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.
- Reports as to the conduct or condition of your tenancy, including references from previous tenancies, and complaints of anti-social behaviour
- Medical information

WHY MHA/MPS NEED THIS INFORMATION ABOUT YOU AND HOW IT WILL BE USED

We collect and use the above information to meet our obligations and duties to you in accordance with the terms of our contract with you and in particular to

- enable us to supply you with the services and information which 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 and improve and develop our business and the services we offer.
- contact you to send you details of any changes to our suppliers which may affect you.
- for all other purposes consistent with the proper performance of our operations and business; and
- contact you for your views on our products and services.

In some cases, it is necessary for us to process data to comply with our legal obligations, for example to ensure compliance with health and safety law.

We will not generally require your consent to process your personal information in accordance with this policy. There may be some occasions where we ask for your explicit written consent but, where we do so, we will provide full details of what we are seeking consent for so that you can carefully consider whether to provide that consent. When you do provide your consent, you are entitled to withdraw it at any time.

SHARING YOUR INFORMATION

The information you provide to MHA/MPS will be treated by us as confidential and will be processed only by our employees within the UK/EEA. We may disclose your information to other third parties who act for us for the purposes set out in this notice or for purposes approved by you, including the following:

- If we enter a joint venture with or merge with another business entity, your information may be disclosed to our new business partners or owners;
- If we instruct repair or maintenance works, your information may be disclosed to any contractor.
- 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 are updating tenancy details, your information may be disclosed to third parties (such as utility companies and Local Authority).
- If we are investigating payments made or otherwise, your information may be disclosed to payment processors, Local Authority and the DWP.
- 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
- To the SHR with regards to statistical data.

When sharing personal data with our third-party service providers who process data on our behalf, we have a written contract in place which only permits them to process your data for specific purposes and in accordance with our instructions.

TRANSFERS OUTSIDE THE UK and EUROPE
Your information will only be stored within the UK and EEA.

SECURITY
When you give us information, we take steps to make sure that your personal information is kept secure and safe. For full details, please see our Privacy Policy.

HOW LONG MHA/MPS WILL KEEP YOUR 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 (we may be legally required to hold some types of information), or as set out in any relevant contract we have with you.

We will generally keep your information for the minimum periods outlined in Appendix 2 of this policy after which this will be destroyed if it is no longer required for the reasons it was obtained. Our full retention schedule is available at Appendix 2 of the GDPR Policy.

YOUR RIGHTS
You have the right at any time to:

- ask for a copy of the information about you held by MHA/MPS in our records.
- ask us to correct any inaccuracies of fact in your information.
- request that we erase or restrict the processing of your personal data in certain circumstances; and
- Object to the processing of your personal data where processing is carried out based on legitimate interests.

If you would like to exercise any of your rights above, or you have any complaints about the way your data is processed or handled by us, please contact admin@milnbank.org.uk or 0141-551-8131. You should note that your rights under the GDPR and 2018 Act are not absolute and are subject to qualification.

If you remain unsatisfied after your complaint has been processed by us, 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:

The Information Commissioner's Office – Scotland
45 Melville Street, Edinburgh, EH3 7HL
Telephone: 0303 123 1115
Email: Scotland@ico.org.uk

The accuracy of your information is important to MHA/MPS - please help us keep our records updated by informing us of any changes to your email address and other contact details.