

Manor Estates Associates Limited
Privacy Notice
TENANT NOTICE
(How we use 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 handle your information.

Who are we?

Manor Estates Associates Limited is a subsidiary of Manor Estates Housing Association, a Scottish Charity (Scottish Charity Number SCO23106), a registered society under the Co-operative and Community Benefit Societies Act 2014 with Registered Number 2484R(S) and has their Registered Office at Suite 4, 5 New Mart Place, Edinburgh EH14 1RW. We take the issue of security and data protection very seriously and strictly adhere data protection legislation, including the UK General Data Protection Regulation, the Data Protection Act 2018 and Privacy and Electronic Communications Regulations..

We are notified as a Data Controller with the Office of the Information Commissioner's Office under registration number Z6870536 and we are the data controller of any personal data that you provide to us.

How we collect information from you and the type of information we collect

We collect information about you:

- When you apply for housing with us, become a tenant, request services / repairs, and provide us with your personal details;
- For the management and the termination of your tenancy;
- When you apply to become a member of the Association;
- From your use of our online services, including use of our online portal whether to report any tenancy issues, make a complaint, update personal details 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

We may collect the following information about you:

- Name;
- Address;
- Telephone number;
- E-mail address;
- National Insurance Number;
- Next of Kin;
- Other third party contact details;

- Household details;
- Employment details;
- Racial or ethnic origin;
- Political opinions;
- Trade union membership;
- Genetic data or biometric data;
- Data concerning your sex life or sexual orientation;
- Religious or philosophical beliefs
- Health data;
- Criminal convictions or suspicion of criminal activities
- Date of birth;
- Nationality, Asylum or Immigration Status;
- Photographic identification
- Any other personal data, including special category personal data which you provide us with

We receive the following information from third parties:

- Benefits information, including awards of Housing Benefit/ Universal Credit
- 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, complaints of anti-social behaviour, reports regarding tenancy concerns (including the condition/cleanliness of your home) from contractors or any other persons entering your home in an official capacity.

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

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, namely the tenancy agreement, with you or in order to enter into such an agreement
- To enable us to supply you with the services and information which you have requested;
- To enable us to respond to your repair request, housing application and 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 contractors or suppliers 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

The information you provide to us 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 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 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 Department of Work & Pensions;
- If we are taking action against you, your information may be disclosed to our legal representatives;
- 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 we are taking action against you, your information may be disclosed to our legal representatives;
- If we are making arrangements to have an interpreter available to assist in communication with you, your information may be disclosed to the service provider;
- Your information may be disclosed to the contractor responsible for monitoring the personal safety of our staff;
- We will share your information with Safe Deposits Scotland who are responsible for managing the deposit you pay to us at the start of your tenancy;
- We may disclose your information to employees of other organisations who are providing a service on behalf of MEAL, such as welfare rights or energy advice.

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.

The lawful basis for processing your personal data

Under the UK General Data Protection Regulation, the lawful bases which we rely on for processing this information are:

- We have your consent
- We have a contractual obligation, including pre-contractual negotiations
- We have a legal obligation
- We have a vital interest
- We have a legitimate interest

Transfers outside the UK and the European Economic Area

Your information will only be stored within the UK and EEA.

Were information to be transferred outside the UK or EEA we will ensure that there are adequate safeguards in place to protect your information in accordance with this notice.

Security

When you give us information we take steps to make sure that your personal information is kept secure and safe.

- All electronic files are password protected and may only be accessed by authorised staff in the performance of their duties.
- Paper files are retained in locked cabinets and only accessed by authorised staff
- Information transferred to contractors (name, address and contact details) is securely managed and we ensure contractors are GDPR compliant

How long will we 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 legal or financial regulations. Our full retention schedule is available from our office at 11 Washington Lane, Edinburgh EH11 2HA.

Your rights

Under data protection law, you have certain data subjects' rights including:

Your right of access	You have the right to ask us for copies of your personal information
Your right to rectification	You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete
Your right to erasure	You have the right to ask us to erase your personal information in certain circumstances.
Your right to restriction of processing	You have the right to ask us to restrict the processing of your personal information in certain circumstances.
Your right to object to processing	You have the the right to object to the processing of your personal information in certain circumstances.
Your right to data portability	You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances

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 contact us at info@manorestates.org.uk

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.

Queries and Concerns

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

Claire Ironside
Chief Executive
Manor Estates Housing Association
Email: cironside@manorestates.org.uk
Tel: 0800 093 8823

Carolyn Hughes
Housing Management Director
Manor Estates Housing Association
Email: chughes@manorestates.org.uk
Tel: 0800 093 8823

OR by contacting our Data Protection Officer, who is provided by RGDP LLP and can be contacted either by telephone on **07935 008 316** or by email at info@rgdp.co.uk

You can also complain to the ICO if you are unhappy with how we have used your data. Their details are as follows:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline Number: 0303 123 1113

ICO Website <https://www.ico.org.uk>