

## WEBSITE PRIVACY POLICY

This website is operated by Forth Housing Association Limited. We, Forth HA, take your privacy seriously and we ask that you read this policy carefully, as it contains important information on:

- the personal information we collect about you;
- what we do with your personal information; and
- who your personal information might be shared with.

We are the controller of the personal information that we collect from you on our website, which means that we are legally responsible for how we collect, hold and use your personal information. It also means that we are required to comply with data protection laws when collecting, holding and using your personal information.

We have appointed a Data Protection Officer (DPO), Daradjeet Jagpal, who ensures that we comply with data protection laws. If you have any questions about this statement or how we hold or use your personal information, please contact the DPO by: e-mail at [forthdpo@infolawsolutions.co.uk](mailto:forthdpo@infolawsolutions.co.uk); telephone on 07378 635 275; or writing to: The Data Protection Officer, Forth Housing Association Limited, Kildean Business & Enterprise Hub, 146 Drip Road, Stirling, FK8 1RW.

You can also contact us by: e-mail at [info@forthha.org.uk](mailto:info@forthha.org.uk); telephone on 01786 446 066; or writing to: Forth Housing Association Limited, Kildean Business & Enterprise Hub, 146 Drip Road, Stirling, FK8 1RW.

**Your attention is particularly drawn to section 2 of this policy, which confirms that you consent to your personal information and sensitive personal information being held and used by us as described in section 1 of this policy.**

### 1. What personal information do we collect about you and why?

Our website is a place for you to find out more about us, your neighbourhood and the services available to you.

When you visit our website, we collect personal information about you when you:

- pay your rent;
- pay your factoring bill;
- report a repair to us;
- make a complaint to us or otherwise provide your comments on the standard of service that you have received from us;
- download and submit a housing application form to us; and
- contact us.

We use such personal information to:

- provide you with the services that you have requested from us;
- communicate with you, including in response to any of your enquiries;

- improve our services and respond to changing needs;
- process your rent payments;
- carry out repairs to your property;
- handle and resolve complaints made by / against you;
- keep the personal information that we hold about you accurate and up-to-date (if you provide any new personal information to us via the website); and
- arrange an appointment with our Income Max Officer, who can provide you with benefits and debt advice and support.

We may not be able to provide the above services to you if you do not provide us with sufficient personal information to allow us to do so.

We may also collect information about you via cookie files. A cookie is a small text file that is placed on to your computer or other access device when you visit our website. We use cookie files for analytics purposes to gather statistical information on your use of our website.

[The information we obtain from our use of cookies will not usually contain your personal information. Although we may obtain information about your computer or other access device, such as your IP address, your browser and / or other internet log information, this will not usually identify you personally.]

The table below provides more information about the cookies we use and why:

Name of cookie	Owner	Purpose of the cookie
Google Analytics	Google Inc.	This is a web analytics service provided by Google Inc., which uses cookies to show us how you found and explored our website, and how we can enhance your experience. It provides us with information about how you used our website e.g. how long you stayed on the website, the average number of pages viewed and also tells us how many visitors we have had.

If you do not want to accept cookies, you can change your browser settings so that cookies are not accepted. If you do this, please be aware that you may lose some of the functionality of this website.

## 2. What is our legal basis for holding and using your personal information?

Data protection laws require us to have a legal reason for collecting, holding and using your personal information.

In some circumstances, we may rely on your consent as the legal reason. By providing us with your personal information and sensitive personal information (relating to your health, racial or ethnic origin, religious or other beliefs or sexual orientation) and the

personal information and sensitive personal information of other members of your household via our website, you:

- consent to it being used by us as described in section 1 of this policy; and
- confirm that you have informed the other members of your household of 12 years old and above of the content of this policy and they have provided their consent to their personal information and sensitive personal information being used by us as described in section 1 of this policy.

You and the other members of your household have the right to withdraw your consent to us holding and using your and their personal information and sensitive personal information by contacting us. Once you / they have withdrawn your / their consent, we will no longer use your / their personal information and sensitive personal information for the purpose(s) set out in section 1 of this policy, which you originally agreed to, unless we have another legal reason for doing so.

Our other legal reasons for holding and using your personal information are:

- performance and management of the tenancy agreement between us;
- legal and regulatory obligations which apply to us as a registered social landlord;
- protection of your vital interests; and
- our legitimate interests – while you have a legitimate interest in the protection of your personal information, we also have an overriding legitimate interest in handling and using your personal information, including sharing it with our service providers (listed in section 3 of this policy), for the purposes described in section 1 of this policy.

### **3. Who do we share your personal information with?**

We may share your personal information with the following organisations for the purposes described in section 1 of this policy:

- our contractors to undertake repairs, works and maintenance;
- organisations providing benefits advice and support and the Department of Work and Pensions; and
- Police Scotland and Stirling Council anti-social behaviour department in relation to complaints involving anti-social or other criminal behaviour.

### **4. How long do we keep your personal information?**

We will only keep your personal information for as long as we need to for the purposes described in section 1 of this policy, including to meet any legal, accounting, reporting or regulatory requirements. More information is contained in our data retention policy, which is available by contacting our Data Protection Officer (DPO).

### **5. How do we keep your personal information secure?**

The security of your personal information is of important to us and we use technical and organisational measures to safeguard your personal information.

However, while we will use reasonable efforts to safeguard your personal information, the use of the Internet is not entirely secure and, for this reason, we cannot guarantee the security of any personal information that is transferred by or to you via the Internet. If you have any concerns about the security of your personal information, please contact our DPO for more information.

## **6. What if you provide us with personal information about somebody else?**

We understand that there may be situations where you provide us with personal information about somebody else. In those situations, you confirm that:

- the other individual has consented to you acting for them and to your use of their personal information;
- you have informed the other individual of our identity and the contents of this policy, including the purposes for which we will use that individual's personal information described in section 1 of this policy; and
- the other individual has explicitly consented to our use of that individual's personal information for the purposes described in section 1 of this policy.

This policy will apply to our collection, handling and use of the other individual's personal information in the same manner that it applies to your own personal information.

## **7. [Do we send your personal information outside the EU?**

We may need to transfer your personal information collected on our website to our service providers based in countries outside the EU. These countries may not have the same standard of data protection laws as the EU. In this case, we will safeguard your privacy rights and give you remedies in the unlikely event of a data security breach incident involving your personal information.]

## **8. What rights do you have in relation to your personal information that we collect, hold and use?**

It is important that the personal information that we collect, hold and use about you is accurate and current. Please keep us informed of any changes by contacting our DPO. Under certain circumstances, the law gives you the right to request:

- A copy of your personal information and to check that we are holding and using it in accordance with legal requirements.
- Correction of any incomplete or inaccurate personal information that we hold and use about you.
- Deletion of your personal information where there is no good reason for us continuing to hold and use it. You also have the right to ask us to do this where you object to us holding and using your personal information (details below).
- Temporarily suspend the use of your personal information, for example, if you want us to check that it is correct or the reason for processing it.
- The transfer of your personal information to another organisation.

You can also object to us holding and using your personal information where our legal basis is a legitimate interest (either our legitimate interests or those of a third party).

Please contact our DPO if you wish to make any of the above requests. When you make a request, we may ask you for specific information to help us confirm your identity for security reasons. You will not need to pay a fee when you make any of the above requests, but we may charge a reasonable fee or refuse to comply if your request for access is clearly unfounded or excessive.

## **9. Feedback and complaints**

We welcome your feedback on how we hold and use your personal information, and this can be sent to our DPO.

You have the right to make a complaint to the Information Commissioner, the UK regulator for data protection, about how we hold and use your personal information. The Information Commissioner's website is <https://ico.org.uk/> and complaints can be made [here](#).

If you would like to receive this policy in alternative format, for example, audio, large print or braille, please contact our DPO.

## **10. Updates to this policy**

We may update this policy at any time, and you should check this policy occasionally to ensure you are aware of the most recent version that will apply each time you access our website.

Last updated: Sept 2018