Manor Estates Associates Limited
Privacy Notice
Factoring Customer

(How we use your personal data)

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 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, the Data (Use and Access) Act 2025 and Privacy and Electronic Communications Regulations.

We are registered as a Data Controller with the Information Commissioner's Office under registration number ZA 611854.

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

We collect information about you

- When you become an owner of a property to which MEAL provides factoring services;
- When you become a private tenant of a property to which the Association provides factoring services;
- When you request services from us;
- From your use of our online services, whether to report any factoring issues, make a complaint or otherwise;
- When you apply to become a member of the Association.

We may collect the following information about you:

- Name;

- Addresses;
- Date of Birth
- Telephone number;
- E-mail address;
- Bank details;
- Refences;
- Signature;
- Next of Kin;
- Other third-party contact details;
- Employment details;
- Payments;
- Video and audio recordings; and
- Special category personal data including health information, protected characteristics and criminal convictions.

We receive the following information from third parties:

- Payments made by you to us;
- Complaints or other communications; and
- Such other information as may be required from time to time

This information primarily comes from:

- Local Authorities
- Health professionals
- Charities
- Other registered social landlords
- Legal Advisors
- Contractors and suppliers who have undertaken works on our behalf
- MPs, MSPs and councillors
- Utility companies
- Household members
- Debt collection agencies

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

We need your personal information and will use your personal information

- To undertake and perform our obligations and duties to you in accordance with our Written Statement of Services;
- To enable us to supply you with the services and information which you have requested;
- To enable us to respond to your repair request;
- To enable us to respond to a complaint you have made;
- To contact you in order to send you details of any changes to our services which may affect you;
- To meet our legal and regulatory obligations;
- To contact you for our views on our services; and
- To analyse the information we collect so that we can administer, improve and develop our business and the services we offer.

Sharing of your information

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 and healthcare providers insofar as reasonably necessary, and in accordance with data protection legislation.

Examples of where we may share your personal data includes the following:

- If we enter into a joint venture with or merge with anther business entity, you information may be disclosed to our new business partners or owners;
- If we instruct repair or maintenance works, your information may be disclosed to a contractor we employ to carry out such works;
- If we are investigating a complaint, information may be disclosed to Police Scotland, relevant local authority departments, Scottish Fire & Rescue Service and others involved in any complaint, whether investigating the complaint or otherwise;
- If we are reviewing payments made or debts outstanding, your information may be disclosed to payment processors or debt collection agencies;
- 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.

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

- contract
- consent
- our legitimate interests (including references, data sharing with utility providers, next of kin details, newsletters, surveys, void property management, anti social behaviour app information 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

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.

Transfers outside the UK

Your information will only be stored within the UK.

Your information will only be processed within the United Kingdom, except where international transfers are authorised by law.

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 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 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 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. All personal data will be retained in accordance with our Retention Policy and Schedule.

Your rights

You have the right at any time to request us 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

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 contacting:

Claire Ironside
Chief Executive
Manor Estates Housing Association
Email: cironside@manorestates.org.uk
Tel: 0131 510 8540

OR by contacting our Data Protection Officer, who is provided by RGDP LLP and can be contacted 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: Make a complaint | ICO
Date of approval:16,11.26