Manor Estates Housing Association
Privacy Notice
TENANT NOTICE
(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 Housing Association is 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 Z6870536 and we are the data controller of any personal data that we process regarding you.

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

We collect personal information about you in order to:

- When you apply for housing with us, become a tenant, request services / repairs and provide us with your personal details;
- 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; and
- Compliance with legal and regulatory requirements.

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;
- protected characteristics
- Health data;
- Criminal convictions or suspicion of criminal activities
- Date of birth;
- Nationality, Asylum or Immigration Status;
- Photographic identification
- Video and audio recordings
- Payments
- Complaints
- 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;
- Payments made by you to us;
- Information from local authorities, such as information relating to homeless applications
- Complaints or other communications regarding behaviour or other alleged breaches of the terms of your contract with us, including information obtained from Police Scotland; and
- 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;
- Keep you updated in relation to any changes to our services;
- Monitor our performance in relation to service delivery;
- Refer you to other organisations that may support you;
- To meet our legal and regulatory obligations;

- 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

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:

- With your consent;
- To the extent that we are entitled or required to do so by law;
- If we enter into a joint venture with or merged with another business entity, your information may be disclosed to our new business partners or owners;
- If we instruct repair, maintenance or upgrade works, your information may be disclosed to our contractors;
- If investigations are ongoing in relation to a complaint or crime, information may be disclosed to the Scottish Public Services Ombudsman, Police Scotland, Local Authority departments, Scottish Fire & Rescue Service, elected members 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;
- We may share details with our Data Protection Team and/or Legal Advisors;
- If required by an emergency service;
- 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 required by law, we will disclose your information to statutory bodies such as auditors or solicitors;
- If your household is threatened with homelessness, your information may be shared between us and Local Authority;
- If you request that we share your information with other housing providers who may assist in re-housing you;
- If we are pursuing debt recovery, or taking enforcement action against you, your information may be disclosed to our solicitors, debt recovery agents, support agencies and Local Authority;
- If we are making an insurance claim following an incident we may share your information with our insurers;
- If we need to facilitate the payment of any benefits, your information may be disclosed to the Department of Work and Pensions, Local Authority or any other relevant department;
- If we are making arrangements to have an interpreter available to assist in communications with you;
- Your information may be made available to contractors who have responsibility for monitoring the safety of our staff; and
- If the Local Authority is processing information about your council tax or relating to the electoral register, your information may be disclosed to them; and

- If required by a regulatory body, such as the Scottish Housing Regulator, Financial Conduct Authority or the Office of the Scottish Charity Regulator

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

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

- contract
- consent
- our legitimate interests (including newsletters, video and audio recordings, , void property management, anti-social behaviour app information, references, data sharing with utility companies, next of kin details 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 personal 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 software containing personal data is stored securely 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 and as detailed in 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 either contacting:

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

Flora Hurrell
Governance and Compliance Officer
Manor Estates Housing Association
Email: fhurrell@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

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