

## **Highland Residential (Inverness) Ltd**

### **Residential Lettings Tenant Privacy Notice**

This Privacy Notice explains how Highland Residential (Inverness) Ltd collects and uses your personal information when we provide private lettings tenancy services to you.

During our activities we will process personal information 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.

This notice will provide you with information about your rights under the General Data Protection Regulation (EU) 2016/679 [GDPR] and the Data Protection Act 2018 [the Data Protection Legislation] and how to action these rights.

#### **Who we are**

Highland Residential (Inverness) Ltd is a company incorporated under the Companies Act (registered number SC527445) with a registered office of 98-104 High Street, Invergordon, IV18 0DL. It is a wholly owned subsidiary of Albyn Housing Society Ltd, a Scottish Charity (Scottish charity number SC027123), a registered society under the Co-operative and Community Benefit Societies Act 2014 with registered number SP1776RS and having a registered office at 98-104 High Street, Invergordon, IV18 0DL

Highland Residential (Inverness) Ltd is registered as a data controller with the Information Commissioner's Office (ICO) under registration number ZB461898 and is the "Controller" of any personal data that you provide to us.

Our Data Protection Officer is Laura Morgan. Any questions relating to this notice and our privacy practices should be sent to [informationrequests@albynhousing.org.uk](mailto:informationrequests@albynhousing.org.uk)

#### **What information we hold**

To allow us to provide private lettings tenancy services to you, we may process the following information about you and any guarantor:

- Name
- Current address and address history for the past 5 years
- Address and current housing tenure including any landlord's details
- Telephone number(s)
- Email address
- National insurance number
- Date of birth
- Next of kin
- Right to residency in UK
- Financial information – including employer's details, income verification, benefits payments, bank statements, IVA, County Court Judgments, bankruptcy, trust debt, and a third-party credit referencing report
- Details of household members intending to reside with you, including income, name(s), date(s) of birth and their relationship to you
- References from former landlords

We collect your personal information from you via a variety of sources, including when you complete one of our forms, when you call, write, email or meet with us or respond to a survey. We may collect information when you use our social media sites and our website.

## **Why we need your personal information - Contractual purposes and legal obligation**

We collect your information and may use it for the following purposes:

- To assess your application to rent a property
- To enable us to supply you with the services and information which you have requested or expect from us
- To undertake and perform our obligations and duties to you in accordance with the terms of our contract with you
- Comply with any legal obligations, we are subject to
- To enable us to respond to service requests including repairs and tenancy changes
- To investigate and respond to complaints
- To contact you in order to send you details of any changes to our services which may affect you
- For all other purposes consistent with the proper performance of our operations and business including debt recovery

## **Why we need your personal information – legitimate interests**

We also process your personal information in pursuit of our legitimate interests. This may include:

- Research and statistical analysis to help improve our business processes and the services offered to our customers, as well as to evaluate our performance against other benchmarks. Where possible, statistical information is anonymised or pseudonymised.
- Customer segmentation research to allow us to help us better understand our customers' characteristics and prioritise, tailor and target services to you.
- Surveys relating to our services in order to gauge satisfaction and make improvements based on feedback.

Where we process your personal information in pursuit of our legitimate interests, you have the right to object to us using your personal information for the above purposes. If you wish to object to any of the above processing, please contact us by emailing: [informationrequests@albynhousing.org.uk](mailto:informationrequests@albynhousing.org.uk)

If we agree and comply with your objection, this may affect our ability to undertake the tasks above for your benefit.

## **Other uses of your personal information**

We may ask you if we can process your personal information for additional purposes. Where we do so, we will provide you with an additional privacy notice with information on how we will use your information.

## **Who we share your personal information with**

We share limited personal data with our contractors who are carrying out services on our behalf including:

- Emergency, responsive, or planned property repairs contractors
- Satisfaction survey providers
- Credit referencing agencies
- Rental deposit schemes
- Registered landlord of the property
- Payment service providers

- Debt collection services
- Property management systems providers

Our contractors are required to comply with the law and our own Data Processing Agreement or Data Processing Clauses within our contracts to ensure data is managed appropriately and for specified purposes.

We may be required to share personal information with statutory or regulatory authorities and organisations to comply with statutory obligations. We may also share personal information with our professional and legal advisors for the purposes of taking advice.

We will only share information on the basis of your consent or in accordance with another lawful basis under UK data protection legislation.

In the event that we do share personal information with external third parties, we will only share such personal information strictly required for the specific purposes and take reasonable steps to ensure that recipients shall only process the disclosed personal information in accordance with those purposes.

### **How we protect personal information**

When you give us information, we take steps to make sure that your personal information is kept safe and secure. Your personal information is stored on our paper and IT filing systems which may be copied for testing, back up, archiving and disaster recovery purposes. Access to your information is limited to those who require it to provide services to you. All data is held within the UK and EEA.

If any of your personal information is transferred outwith the European Union or the European Economic Area by any of our contractors, we will ensure that there are adequate safeguards in place to protect personal information in accordance with the General Data Protection regulations and applicable UK Data Protection Legislation

### **How long we keep your personal information**

We will only keep your personal information for as long as necessary to provide you with tenancy services and to safeguard Highland Residential Ltd in the event of any claims, complaints, litigation, enquiries or investigations during or following the termination of your tenancy.

We will keep certain personal information of tenants for longer in order to confirm how long you were a tenant. We need to do this to in the event of a claim against Highland Residential Ltd.

We have a data retention policy that sets out the periods for all information we hold about your factoring service. You can request a copy by contacting:  
[informationrequests@albynhousing.org.uk](mailto:informationrequests@albynhousing.org.uk)

### **Your rights**

Under data protection law, you have 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.

Please contact us at [informationrequests@albynhousing.org.uk](mailto:informationrequests@albynhousing.org.uk) if you wish to make a request.

### **How to complain**

If you have any concerns about our use of your personal information, you can make a complaint to us by contacting the Data Protection Officer for Albyn Housing Society Ltd [informationrequests@albynhousing.org.uk](mailto:informationrequests@albynhousing.org.uk)

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

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

0303 123 1113

[www.ico.org.uk](http://www.ico.org.uk)

### **Changes to your Privacy Notice**

Our Privacy Notice is regularly kept up to date and this version was updated in February 2021.