

[ Clan Gordon ]  
**GDPR Fair Processing 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?**

We, Clan Gordon Unit 1, 1 Carmichael Place, Edinburgh, EH6 5PH, take the issue of security and data protection very seriously and strictly adhere to guidelines published in the Data Protection Act of 1998 and the General Data Protection Regulation (EU) 2016/679 which is applicable from the 25 May 2018, together with any domestic laws subsequently enacted.

We are notified as a data controller with the Information Commissioner's Office (ICO) under registration number **Z157677X** and we are the data controller of any personal data that you provide to us.

Our data protection officer is **Paula Hyslop** [paula@clangordon.co.uk](mailto:paula@clangordon.co.uk)

Any questions relating to this notice and our privacy practices should be sent to Paula Hyslop.

**How we collect information from you and what information we collect**

We collect information about you:

- when you apply for housing with us, become a tenant, request services/repairs, enter in to a tenancy agreement with ourselves howsoever arising or otherwise provide us with your personal details;
- from your use of our online services, whether to report any tenancy related issues, make a complaint 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 collect the following information about you:

- name;
- address;
- telephone number;
- email address;
- National Insurance number;
- next of kin
- employment details

We receive the following information from third parties:

- benefits information, including awards of Housing Benefit/Universal Credit;
- credit check report;
- payments made by you to us;
- 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, and complaints of anti-social behaviour.

### **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 with you;
- 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 services or supplies 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/European Economic Area (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 for Work & Pensions;
- 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 asked by HMRC in regard to taxation, your information may be accordingly disclosed;

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.

## **Transfers outside the UK and Europe**

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

## **Security**

When you give us information we take steps to make sure that your personal information is kept secure and safe. [Link to Privacy Policy](#)

## **How long we will 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.

## **Your rights**

You have the right at any time to:

- ask for a copy of the information about you held by us in our records;
- require us to correct any inaccuracies in your information;
- make a request to us to delete what personal data we hold about you; and
- object to receiving any marketing communications from us.

If you would like to exercise any of your rights above please contact us at **[paula@clangordon.co.uk](mailto:paula@clangordon.co.uk)**

Should you wish to complain about the use of your information, we would ask that you contact us to resolve this matter in the first instance. You also have the right to complain to the ICO in relation to our use of your information. The ICO's contact details are noted below:

The Information Commissioner's Office – Scotland  
45 Melville Street, Edinburgh, EH3 7HL  
Telephone: 0131 244 9001  
email:[scotland@ico.org.uk](mailto:scotland@ico.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.