**Hanover (Scotland) Housing Association Ltd**

**Customer Privacy Policy**

Hanover (Scotland) Housing Association Ltd is committed to protecting your personal data and respecting your privacy. This privacy policy sets out the basis on which any personal data collected by Hanover from or about you when you interact with us will be processed by us. It also explains how we will store and handle that data and keep it safe.

**Who are we?**

Hanover (Scotland) Housing Association Ltd

Hanover is one of the leading suppliers in Scotland of homes and services mainly for the elderly.

Hanover (Scotland) Housing Association Ltd is registered with the Office of the Information Commissioner under registration number Z6439206 and we are the data controller in respect of any personal data we collect about you in the UK.

This privacy policy is issued on behalf of Hanover (Scotland) Housing Association Ltd so when we mention ‘Hanover’, ‘we’, ‘us’ or ‘our’ in this privacy Policy, we are referring only to Hanover (Scotland) Housing Association Ltd. Hanover is the data controller in respect of any personal data we collect about you in the UK. Hanover (Scotland) Housing Association Ltd is responsible for the Hanover websites ([www.hanover.scot](http://www.hanover.scot) , [www.hanovercommercial.scot](http://www.hanovercommercial.scot) and [www.hanoverconference.scot](http://www.hanoverconference.scot)).

**Contacting us**

If you have any queries, comments or requests regarding this privacy policy or you would like to exercise any of your rights, you can contact us in the following ways:

By email to: dataprotection@hanover.scot

In writing to:

The Data Protection Officer

95 McDonald Road

Edinburgh

EH7 4NS

The accuracy of the personal data we hold is important to us. Please help us keep our records updated by telling us about any changes to your personal and or contact details, using the contact details above.

**What is Personal Data?**

Personal data is any information about an individual from which that individual can be identified either directly (e.g. personally identifiable information such as your name) or indirectly (e.g. on-line identifiers such as IP address or cookies). It does not include data where the identifying element has been removed (anonymous data).

**What personal data do we collect?**

We need to gather and use certain information about you and our other service users. We manage a significant amount of data, from a variety of sources. This data contains Personal Data and Sensitive Personal Data (known as Special Categories of Personal Data under the General Data Protection Regulation (GDPR)).

You may be asked to submit personal information about yourself in order to receive information or use services from Hanover. Any information provided to us will be treated in accordance with this privacy policy.

**What kind of information do we collect and why?**

Typically, personal information is collected for the following purposes:

**Marketing**

The type of personal information collected could include your name, date of birth, company name, address (including postcode), email address, telephone number (including mobile), user name and password, unique reference numbers, IP address and debit/credit card details.

We may obtain this information directly from you, as part of your interactions with our website, at events, or as a result of you contacting us, or we may obtain this information from public sources such as Linkedin.

*What is the lawful basis for this processing?*

This processing is under our legitimate interest in enabling us to provide housing and services that are of benefit to you.

We have undertaken a legitimate interest’s assessment in relation to this processing. Please get in touch with us using the details in the ‘Contact us’ section if you would like a copy of this assessment.

*How long do we keep this data?*

We retain the data until you inform us that you do now wish to receive any further marketing communications, you unsubscribe from our system or we receive a bounce back from your email address.

*Who has access to this data?*

Authorised staff at Hanover.

We may also be required to share this data with our professional advisers and governing bodies for legal and governance reasons.

**Website Interaction**

*What personal data do we process?*

We set cookies on our website that collect varies pieces of information – please see our Cookies Policy for full details.

*Why do we do this?*

We collect and process your information on the basis of our legitimate interest in order to administer, support, improve and develop our services. This includes but is not limited to;

* quality control and training purposes
* improve the design of the website
* improve our marketing strategy
* to enter into negotiations with you for our products or services

*What is the lawful basis for processing?*

This processing is under our legitimate interest to enable us to operate our website.

We have undertaken a legitimate interest’s assessment in relation to this processing. Please get in touch with us using the details in the ‘Contact us’ section if you would like a copy of this assessment.

*How long do we keep this data?*

Please see our Cookie Policy for full details.

*Who has access to this data?*

Authorised staff at Hanover.

Our Associates or contractors that we use in the delivery of products and services to you, only when required, and there is a contractual relationship and appropriate data protection and security measures in place.

We may be required to share this data with our professional advisers and governing bodies for legal and governance reasons.

**If you Fail to Provide Personal Data**

Where we need to collect personal data by law, or under the terms of a contract that we may have with you and you fail to provide that data when requested, we may not be able to perform the contract we have, or are trying to enter with you , for example, to provide you with services. In this case we may have to cancel a service you have with us, but we will notify you if this is the case at this time.

**Sharing information**

The information provided to us will be treated confidentially and will be processed only by our employees within the UK. When we use a third-party (a data processor) to process personal data, we enter into a written data sharing agreement with the processor to ensure that they fulfil the obligations of the data protection law.

We may disclose information to other third parties who act for us for the purposes set out in this notice or for purposes approved by the customer, including the following:

* Professional advisors such as our lawyers and accountants
* If we enter into a joint venture with or merge with another business entity, information may be disclosed to our new business partners or owners
* If we instruct repairs or maintenance works, information will be disclosed to the contractors.Data D
* 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, information may be disclosed to third parties (such as utility companies and the local authority)
* If we are investigating payments made or otherwise, information may be disclosed to payment processors, the local authority and the Department of Work & Pensions
* If we are conducting a survey of our products and/ or service, information may be disclosed to third parties assisting in the compilation and analysis of the survey results
* The Scottish Housing Regulator, the Care Inspectorate, Health and Safety Executive and Scottish Public Services Ombudsman.
* Unless required to do so by law, we will not otherwise share, sell or distribute any of the information provided to us without your consent.

We may store your data in third party services so that we may provide our services to you, for example:

* Cloud storage providers

When we make use of third parties we only provide the information they need to perform the service. They may only use your data for the exact purpose we specify to them and we work closely to ensure your privacy is secure and respected.

**How long do we keep personal information?**

We will only keep your personal data for as long as we need to in order to fulfil the relevant purpose(s) it was collected for and thereafter for as long as we need to keep it for legal purposes. The minimum periods for retention of information are set out in our Data Retention Policy.

At the end of that period, your data will either be deleted or anonymised. For example, by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

**Security**

We are committed to ensuring that your information is secure.

We have put in place suitable physical, electronic, contractual and managerial control to safeguard and secure the data we collect from and about you in accordance with this Privacy Policy.

**Your rights**

You have the following rights in relation to your personal data:

* Access - you have the right to obtain a copy of the personal data that we hold on you
* Rectification - where data that we hold on you is incorrect or incomplete, you have the right for this to be corrected
* Erasure - in the following circumstances you have the right to the deletion of your data:
	+ Where it is no longer necessary for the original purpose
	+ Where you have previously given consent for the processing of your data and wish to withdraw it
	+ Where you object to the processing of your data, and we have no overriding legitimate interest to continue this processing
	+ You no longer wish your personal data to be used for direct marketing
	+ To meet a legal obligation
	+ Where personal data is unlawfully processed
	+ We have processed the personal data in relation to providing services to a child
* Restriction of processing - in the following circumstances you have the right to request us to restrict how we process your data:
	+ You dispute the accuracy of the personal data that we hold on you
	+ The processing is unlawful and you wish us to restrict processing instead of deleting your data
	+ We no longer need to process your data, but the data is required by you in relation to legal claims
	+ In relation to you raising an objection to the processing of your data
* Data portability – you have the right for your data to be transferred to another controller if we process your data by automated means as a result of your freely given consent or as part of a contract with you
* Object to processing – you may object to processing of your data where we process your data in relation to direct marketing, on the basis of our legitimate interest, where the processing is by automated means, or for scientific, historical or statistical purposes
* Automated decision-making - you have the right not to be subject to solely automated decisions about you (i.e., performed by a computer without human intervention). We do not conduct any automated decision-making.

**If you would like to make a request or update your information**  please either email us at

dataprotection@hanover.scot or write to us at:

Data Protection Officer

95 McDonald Road

Edinburgh

EH7 4NS

We may need to request specific information from you to help us confirm your identity and ensure your right to access the data (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

**Complaints**

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner’s Office. The contact details are:

The Information Commissioner’s Office – Scotland

45 Melville Street

Edinburgh

EH3 7HL

Telephone: 0131 244 9001

Email: Scotland@ico.org.uk

Last updated by the Communications Team 10 May 2019