



Hanover (Scotland) Housing Association Limited 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 are **Hanover (Scotland) Housing Association Limited** (“we/us”), a Scottish Charity (Scottish Charity Number SC014738), a registered society under the Co-operative and Community Benefit Societies Act 2014 with Registered Number 1983RS and having our Registered Office at 95 McDonald Road, Edinburgh EH7 4NS. We take the issue of security and data protection very seriously and strictly adhere to guidelines published in the UK GDPR and Data Protection Act 2018 (the “**2018 Act**”), together with any domestic laws subsequently enacted.

We are registered as a Data Controller with the Information Commissioner’s Office (“**ICO**”) under registration number Z6439206 and we are the data controller of any personal data that you provide to us.

Our Data Protection Officer is Elaine McCaffery, Hanover (Scotland) Housing Association Limited, 95 McDonald Road, Edinburgh, EH7 4NS, or dataprotection@hanover.scot

Any questions relating to this notice and our privacy practices should be sent to Company Secretary, Hanover (Scotland) Housing Association Limited, 95 McDonald Road, Edinburgh EH7 4NS

How we collect information from you and what information we collect

We collect information about you when you are nominated as a Keyholder or Next of Kin (NOK) for a recipient of Hanover’s telecare monitoring service (Hanover Connect).

We will collect the following relevant information about you:

- Name;
- Address;
- Your relation to the service user;
- Contact number(s);
- E-mail address;

- Contact preferences;
- Availability

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 duties to Hanover customers in receipt of a telecare service, in accordance with the terms of our contract with them, to protect their vital interests, and/ or where we have another legitimate interest in doing so (provided that your interests and fundamental rights do not override those interests), or with your consent for a specific purpose.

Our lawful basis for processing this information is legitimate interests, as it is necessary to provide an effective telecare service and respond to emergencies, which directly benefits the customer. We will only use your data for the purposes of delivering the telecare monitoring service.

This includes:

- To contact you to request support for a customer in receipt of a telecare service for whom you are a nominated contact in the event that they need support following an alarm activation
- To inform you in the event of emergency services being contacted on behalf of the customer for whom you are a nominated Next of Kin contact following an alarm activation.
- To analyse the information we collect so that we can administer, support and improve and develop our business and the services we offer;
- For all other purposes consistent with the proper performance of our operations and business;
- To contact you for your views on our products and services;
- If we need to raise or defend legal claims
- Preventing or detecting unlawful acts
- To get advice from our legal and other professional advisors

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/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 but not restricted to the following:

- If we enter into a joint venture with or merge with another business entity, your information may be disclosed to our potential business partners or owners;
- If we instruct repair or maintenance works, your information may be disclosed to any contractor;
- Our insurers;
- 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 requested by an emergency service;
- Your information may be shared with our solicitors and auditors and with the Courts or Alternative Dispute Resolution providers if relevant.
- 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.
- Bodies who regulate such as the Scottish Public Services Ombudsman or Scottish Housing Regulator

Unless we have a lawful basis and/or special condition under data protection legislation or regulations, 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 your information, we take steps to make sure that your information is kept secure and safe.

We ensure appropriate safeguards are in place to prevent unauthorised access to personal information. If personal information is stored on paper, we will store it in a secure place where unauthorised personnel cannot access it. For personal information stored electronically our electronic files are controlled by strict access permissions so data is only available to those who need to use it. For further information on how we protect your personal information, please see our Data Protection Policy which is available on request to our Head Office at 95 McDonald Road, Edinburgh, EH7 4NS or email dataprotection@hanover.scot.

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.

- Call recordings kept for two years
- Data still live for two years, account de-activated

Our full retention schedule is available on request to our Head Office at 95 McDonald Road, Edinburgh EH7 4NS or email dataprotection@hanover.scot

Failure to provide your information

Where we need to collect personal data by law, or under the terms of a contract that we 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 into with you. 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 the time.

Your Rights

You have the right, subject to certain exemptions set out in data protection law and regulations, at any time to:

- 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 – you have a right to make a request to us to delete what data of yours we hold

- Restriction of processing – you have a right to request that we restrict 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 have a right to object to the processing of your data.
- 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
- Withdraw your consent – you have the right to withdraw your consent to the collection, processing and transfer of your data for a specific purpose at any time.

If you would like to exercise any of your rights above, please contact our Data Protection Officer, Elaine McCaffery, at Hanover (Scotland) Housing Association Limited, 95 McDonald Road, Edinburgh, EH7 4NS, or dataprotection@hanover.scot. You should note that your rights under the UK GDPR and 2018 Act are not absolute and are subject to qualification.

Complaints

If you have any complaints about the way your data is processed or handled by us, please contact our Data Protection Officer, Elaine McCaffery, at Hanover (Scotland) Housing Association Limited, 95 McDonald Road, Edinburgh, EH7 4NS, or dataprotection@hanover.scot.

You also have the right to complain to the Information Commissioner's Office in relation to our use of your information. The Information Commissioner's contact details are noted below:

The Information Commissioner's Office – Scotland
Queen Elizabeth House
Sibbald Walk
Edinburgh
EH8 8FT

Telephone: 0303 123 1115
Email: 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.