

LISTER HOUSING CO-OPERATIVE LTD - PRIVACY NOTICE

The purpose of this Privacy Notice is to explain to you the reasons for which we will process your personal data and explain your rights under the current data protection laws. We are committed to being transparent about how we collect and use your data, and to meeting our data protection obligations towards you.

Lister Housing Co-operative is a fully mutual co-operative housing association registered with the Scottish Housing Regulator (HAC 150); and a registered society under the Co-operative and Community Benefit Societies Act 2014 (1876 RS) at 36 Lauriston Place, Edinburgh, EH3 9EZ. Lister ("we" or "us") is committed to preserving your privacy. We are registered as a Data Controller with the Information Commissioner Office (no. Z616971X). Please read the following privacy notice to understand how we use and protect the information that you provide to us.

When we collect information about you

- When you apply for housing with us, become a tenant, become a member, request services/repairs or otherwise provide us with personal details.
- When you use our website or online services, enquire or report issues to us.
- When you arrange to make payments to us and discuss rent or benefit issues.
- When you complete surveys that we carry out although you do not have to respond to them.
- When you visit our office / use our premises.

What information we could collect about you

The type of personal information collected on the website could include your name, date of birth, company name, address, email address, telephone number(s) and IP address.

The type of personal information collected from tenants could include the above plus: next of kin & household details, maiden name, place of birth, national insurance number, support needs, medical/health issues, GP contact, vulnerabilities/risks, employment status, proof of ID inc. photo ID, bank details, credit/debit card details, criminal convictions/offences, ethnicity/nationality, language, housing benefit/universal credit notifications, images of your tenancy to evidence breaches or to assist repair works or to catalogue the characteristics of the property.

If you come to our office, we have a CCTV system that records images at the front doorway and the entrance hallway continually. Voicemail messages to the office telephone may be stored.

Information we receive about you from third parties

- Benefits information including awards of Housing Benefit/Universal Credit
- Payments made by you to us (through financial processing arrangements)
- Complaints or other communications regarding behaviour or any 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, complaints of anti-social behaviour, referrals or enquiries from medical or health professionals.

Processing Personal Data

As an organisation we will process data in accordance with the following legal grounds:

Our Contract with you:

We need to process the data we hold on you in order that we comply with our obligations with you under the contract (tenancy agreement) we have with each other, including pre-contractual negotiations.

Legal Obligations:

We are required to meet certain legal obligations as a landlord and as an organisation.

Public Tasks:

Processing is necessary for the performance of a task carried out in the public interest. An example of such a task is the allocation of social rented housing to those in need as defined in the housing and homelessness legislation.

Legitimate Interests:

We are also required to process your data in accordance with our legitimate interests which can occur, during and after our customer / tenant relationship. Our legitimate interests include the usage of CCTV.

Consent:

Where we have your consent for the processing.

Vital Interests:

Where we are acting in the vital interests of data subjects.

Why we need this information and how it will be used:

- To undertake and perform our obligations and duties to you (if you are a tenant) in accordance with our contract with you – the Lister Scottish Secure Tenancy Agreement.
- To enable us to supply you with the services and information which you have requested and meet your specific needs.
- To enable us to respond to your repair request, housing application or 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 enable us to respond to your application for membership and communicate with you in relation to your membership of the Co-operative. To record your membership.
- To enable us to communicate with you and keep you informed about our services and our performance.
- To contact you in order to send you details of any changes to our services or supplies which may affect you.
- For completion of annual returns to regulatory bodies including the Scottish Housing Regulator and the Financial Conduct Authority (Mutual Societies section).
- For all other purposes consistent with the proper performance of our operations & business.
- We record CCTV video for the purposes of crime prevention and public safety.
- We record our office telephone voicemail so we can deal with enquiries received that way.
- To contact you for your views on our services.
- We may contact you by post, telephone, text or e-mail. If you change your mind about being contacted in the future by any of these means, then please let us know.

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 relevant 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:

- When we instruct repair, maintenance or enhancement works, your information may be disclosed to any contractor/consultant.
- When we are investigating a complaint, information may be disclosed to Police Scotland, Local Authority departments, Scottish Fire & Rescue Service, the Scottish Public Services Ombudsman, the Scottish Housing Regulator, the Information Commissioner Office and others involved in any complaint, whether investigating the complaint or otherwise.
- When we are updating tenancy details, your information may be disclosed to third parties (such as utility companies and Local Authority).
- When we are organising or investigating payments made or otherwise, your information may be disclosed to payment processors, Local Authority, the Department of Work & Pensions.
- When we are conducting a survey of our services, your information may be disclosed to third parties assisting in the compilation and analysis of the survey results.
- The production of information for electronic distribution via our website or in hard copy format e.g., newsletters, annual reports, leaflets.
- If we have to take legal action against your tenancy or pursue you for tenancy related debt, your information will be disclosed to Sheriff Officers and/or Solicitors and the courts.
- If we feel that you would benefit from support or advisory services, we would disclose your information to relevant agencies e.g., Mediation, Interpretation Services.
- For the purposes of crime prevention and/or the protection of vulnerable adults/children we would disclose your information to Police Scotland, Health & Social Care Services, Victim Support, Local Authority etc.
- We supply ethnic origin information in an anonymised statistical format to the Scottish Housing Regulator and in general reports produced by us.
- 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.

Processing Special Category Personal Data

- Special categories of personal data mean 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. There are specific legal requirements which need to be met for the processing these special categories of personal data. We will only process these types of personal data in accordance with the law.

Your Rights

As a data subject, you have a number of rights, as follows:

- To be informed of the personal data we process regarding you
- Access and obtain a copy of all your personal data on request
- Require the organisation to change incorrect or incomplete personal data
- Require the organisation to delete or stop processing your personal data e.g. where the data is no longer necessary for the purposes; and object to the processing of your data where the organisation does not require to process it
- To personal data portability
- To object to the personal data we hold on you

If you would like to exercise any of the above rights, please contact the Director or the Data Protection Officer.

International Transfers of Personal Data

We do not transfer your personal data outside of the UK or the EEA other than in accordance with UK data protection legislation.

Data Retention

We will only retain your personal information for as long as necessary to fulfil the purposes for which we collected it, including to satisfy any legal, accounting or reporting requirements and in accordance with our Retention Policy and Schedule.

Cookies

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. The information below explains the cookies we use and why.

WordPress Cookies

WordPress sets cookies as part of its functionality.

[List of WordPress cookies \(opens in new tab\).](#)

Cookie: Universal Analytics (Google)

Name: _gat, _ga, _gid

Purpose:

These cookies are used to collect information about how visitors use our website. We use the information to compile reports and to help us improve the website. The cookies collect information in an anonymous form, including the number of visitors to the website, where visitors have come to the website from and the pages they visited.

[Read Google's overview of privacy and safeguarding data \(opens in new tab\)](#)

Third Party Websites

Because we want your experience of our website to be as informative and useful as possible, we may provide links to websites operated by third parties ("Third Party Websites"). Please be aware that we do not control such Third-Party Websites and that such Third-Party Websites may send their own cookies to users, or otherwise collect data or solicit personal information. We assume no responsibility for the information gathering practices of Third-Party Websites that you are able to access through our Site, and we encourage you to review each Third-Party Website's privacy policy before disclosing any personally identifiable information. Always be aware of where you end up from clicking web-links.

Security

We employ security measures to protect your information from access by unauthorised persons and against unlawful processing, accidental loss, destruction or damage. We cannot guarantee the

security of any information you disclose online, and you do so at your own risk. Please help us keep our records updated by informing us of any changes to your e-mail address and other details.

Changes to this Privacy Notice

We reserve the right to update this privacy notice at any time and will provide you with a new notice when making any substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.

Data Protection Officer

Lister is deemed to be a Public Authority under the Freedom of Information (Scotland) Act 2002 therefore we must appoint a Data Protection Officer (DPO). Lister has engaged RGDP LLP to act as our DPO. To contact them please email info@rgdp.co.uk or claire@rgdp.co.uk. Please also copy us in at: info@lister.coop

Contact us and Complaints

If you have any queries concerning how we process your personal data please either contact our Data Protection Officer or us directly at info@lister.coop or by sending a letter to Lister Housing C0-operative Ltd, 36 Lauriston Place, Edinburgh EH3 9EZ or by telephoning us on 0131 229 6176.

If you have any queries regarding how we process your personal data, please contact our Data Protection Officer in the first instance. If you have any complaints regarding our processing of your personal data you can lodge a complaint with the Information Commissioner's Office. You can contact them as follows:

Telephone: 0303123 113

Online: [Make a complaint | ICO](#)

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