

Lochaber Housing Association

Privacy Notice – Resident Tenant Organisations

What we need

Lochaber Housing Association Limited (LHA) will be a "controller" of the personal information that you provide to us when you become a member of a Resident Tenant Organisation (RTO).

When you become a member of an LHA RTO, we collect the following personal information:

- name, telephone number, mobile number, address, and e-mail address.

We may also collect the following personal information:

- your image in photographic and video form where you are in the vicinity of one of our CCTVs, Body Worn Cameras, vehicle Dashcams or for video conferencing facilities (such as Microsoft Teams or Zoom); and
- your voice recording when telephoning one of our contact numbers, or when in the vicinity of one of our Body Worn Cameras.

Why we need your personal information – legal obligation

We are under a legal obligation to process certain personal information relating to RTOs for the purposes of complying with our obligations under:

- Housing (Scotland) Act 2001, which requires registered social landlords to maintain a register of tenant organisations and keep it open for public inspection at all reasonable times.

Why we need your personal information – legitimate purposes

We also process your personal information in pursuit of our legitimate interests:

- to undertake research to improve our services;
- publicity purposes in either our newsletter or our website or wider release;
- to communicate with you remotely, including via video conference facilities (such as Microsoft Teams or Zoom); and
- for training and monitoring of telephone calls (not all telephone calls will be recorded).

Who we share your personal information with

We are required to share personal information with statutory or regulatory authorities and organisations to comply with statutory obligations. Such organisations include the Scottish Housing Regulator for the purposes of complying with our regulatory reporting requirements. We may also share personal information with our professional and legal advisors for the purposes of taking advice and in the event of legal claims, as well as our internal and external auditors, where required. These organisations will become controllers of your personal information upon receipt in most cases and you should refer to their privacy notices / policies for further details on how they will use your personal information.

How we store your personal information

Your personal information is stored on our electronic filing system and our servers based in the UK and is accessed by our employees for the purposes set out above. The personal data held within the RTO Register is also open for public inspection (this is a statutory requirement).

If we are required to transfer your personal information outwith the EU, we will provide you with information regarding the safeguards that we have put in place with the recipient country to protect your personal information.

How long we keep your personal information

We have a data retention policy that sets out the periods for retaining and reviewing all information that we hold. This sets out different retention periods and you can request a copy by contacting us at DPOLHAGroup@lochaberhousing.org.uk

Your rights

You can exercise any of the following rights by writing to the Data Protection Officer at 101 High Street, Fort William, PH33 6DG or emailing DPOLHAGroup@lochaberhousing.org.uk. We have appointed Harper Macleod LLP as our Data Protection Officer who should be contacted using the contact details above.

Your rights in relation to your personal information are:

- you have a right to request access to the personal information that we hold about you by making a "subject access request";
- if you believe that any of the personal information that we hold about you is inaccurate or incomplete, you have a right to request that we correct or complete your personal information; and
- if you would like to obtain the personal information that we hold about you to reuse it for your own purposes, you may request that we do so.

Any requests received by LHA will be considered under applicable data protection legislation. If you remain dissatisfied, you have a right to raise a complaint with the Information Commissioner's Office at www.ico.org.uk