# Castlehill Housing Association Group
# and subsidiaries
# 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?

Castlehill Housing Association is a Scottish Charity (Scottish Charity Number SCO13584), a registered society under the Co-operative and Community Benefit Societies Act 2014 with Registered Number L0968 and having their Registered Office at 4 Carden Place Aberdeen.

We are registered as a Controller with the Office of the Information Commission (IC) under registration number Z734745X and we are the controller of any personal data that you provide to us.

Our Data Protection Officer is Alison Watson. Any questions relating to this notice and our privacy practices should be sent to info@castlehillha.co.uk

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

We collect information about you to enable us to perform our contractual obligations. You, in turn, are under a contractual obligation to provide the data requested from you to enable performance of the contract (i.e. the tenancy agreement to which you are party). We collect information:

- when you apply for housing with us, become a tenant, request repairs/services (including housing support services), enter into a factoring agreement with ourselves howsoever arising or otherwise provide us with your personal details. This information is provided to us electronically by our Choice Based Lettings/Allocations system provider, in paper/email form if you have been nominated by a Local Authority, from you if you are reporting a repair and in paper/email form from a solicitor if you are receiving factoring from us
- when you sign up to use the My Home portal
- when you apply to become a member
- from your use of our online services, whether to report any tenancy/ factor related issues, make a complaint or otherwise
- where you have left us contact information
- where a telephone call with us (outgoing and/or incoming) is transcribed. A telephone conversation will only be transcribed with your consent
- 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)
- when you exercise your rights under the Freedom of Information (Scotland) Act 2002

We collect the following information:

- Name
- Address
- Date of birth
- Telephone number
- E-mail address
- Former address and former landlord details
- Forms of identification (Driving Licence/Passport)
- Signature
- National Insurance Number
- Next of Kin
- Employment status and details
- Membership of Castlehill Management Committee
- Employers' details
- Banking details
- Housing support requirements
- Medical, mobility and support issues
- Occupational Therapy reports
- GP information
- Family composition and details of family members
- Relationships with Castlehill staff and/or Committee members
- Medical conditions and medication
- Income/benefits information
- Pregnancy status
- Lifestyle details
- Preferred language
- Belief system information – optional and anonymous
- Race or ethnic origin, sex, sexual orientation – optional and anonymous
- Details of your emergency contact
- A transcribed telephone conversation. (A telephone call will only be transcribed with your consent)
- Information regarding substance/alcohol dependency
- Criminal conviction information
- Power of attorney information
- Whether you are at risk of violence, threatening behaviour and/or harassment
- Tenancy related debt information (for the last 5 years) and any other debt information (in order to benefit from financial advice)

We receive the following information from third parties:

- Benefits information, including awards of Housing Benefit/ Universal Credit
- 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 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. This includes:

- to enable us to provide effective housing support where you are receiving housing support services
- to allocate appropriate housing suitable for your needs
- 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 contractors or services which may affect you
- for Castlehill Solutions, credit checks are carried out to ensure that mid market rented properties applicants can afford the rent
- to comply with our legal and statutory duties, including those contained within the Equality Act 2010
- to contact you for your views on our products and services and
- for all other purposes consistent with the proper performance of our operations and business.

**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. 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 or prospective 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, Scottish Public Services Ombudsman and others involved in any complaint (including the use of apps to record anti-social behaviour), whether investigating the complaint or otherwise
- Local authorities where we have specific data sharing agreements in place, for example to monitor housing applicant nominations, (very) sheltered housing applications, for public safety arrangements or if your household becomes threatened with homelessness
- If you are looking to move from Castlehill, we would provide a tenancy reference to another RSL or Local Authority
- If Castlehill Solutions are considering you for a tenancy reference, your information would be provided to a Credit Reference agency for an affordability check
- If we are updating tenancy details, your information may be disclosed to third parties (such as utility companies and Local Authority/Council Tax Office)
- We have an obligation to inform the Benefits Department of any changes to your circumstances that may affect your housing benefit

- If we are investigating payments made or otherwise, your information may be disclosed to payment processors, Local Authority and the Department of Work & Pensions, debt collection agencies
- If we are conducting a survey of our service, your information may be disclosed to third parties assisting in the compilation and analysis of the survey results
- Our regulatory bodies such as the Office of the Scottish Charity Regulator (OSCR), Scottish Housing Regulator (SHR), Scottish Public Services Ombudsman (SPSO), the Care Inspectorate and the Scottish Social Services Council (SSSC)
- Police Scotland, Moray Council, Aberdeen City Council, Aberdeenshire Council Anti Social Behaviour Information Sharing Protocol, MAPPA (Multi Agency Public Protection Arrangement) Information Sharing Protocol for Management of Sex Offenders and Violent Offenders, Police Scotland Serious and Organised Crime Information Sharing Protocol
- Our solicitors where there is a legal action that involves you
- Our internal and external auditors, depending on the scope of the audit
- Our insurers when we need to make a claim following an incident
- Our chosen deposit scheme providers, for people who rent our mid market properties and pay a security deposit
- If we need to communicate with you by post, information will be shared with our contracted mail services provider, who will electronically receive, print and post the document(s) to you
- If we issue a Notice of Proceedings for Recovery of Possession, your information may be disclosed to Aberdeen City Council, Aberdeenshire Council or Moray Council, as appropriate, to allow them to contact you to discuss how you can be helped to sustain your tenancy
- Utilities companies may be provided with the dates of your tenancy and any known forwarding address.Utilities companies may be provided with the dates of your tenancy and any known forwarding address.

First-tier Tribunal for Scotland Housing and Property Chamber (regulatory body for private lets) regarding Solutions tenancies – including information regarding arrears.
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**

Your information is only stored within the UK. If we are required to transfer information outside the UK, we ensure there are adequate safeguards in place to protect your information in accordance with this notice, including ensuring there is a Commission adequacy decision in place for the recipient country.

**Security**

When you give us information we take steps to make sure that your personal information is kept secure and safe.

All staff who work for Castlehill sign a Code of Conduct and, as part of that, are required to adhere to our Data Protection Policy. We also have mandatory Data Protection training for all staff. Our Data Protection Officer oversees compliance with our data protection obligations and our procedures are subject to internal audit by a qualified auditor.

All your information is kept securely both within our Castlehill Offices and on our IT system which has appropriate levels of security. We use an off-site backup for our IT systems that has a high level of encryption.

**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.
We will generally keep your information for the minimum periods set out in our retention schedule, after which, it will be destroyed if no longer required for the reasons it was obtained.

Our full retention schedule is available on our website at www.castlehillha.co.uk

**Your Rights**

You have the right at any time to:

- ask for a copy of the information held about you;
- require us to correct any inaccuracies of fact in your information;
- request that we restrict your data processing or object to our processing in certain circumstances
- Make a request to us to delete what personal data of yours we hold
- request to obtain and reuse your personal data for your own purpose (data portability) - in certain circumstances
- object to receiving any marketing communications from us and
- Submit a complaint to us if you believe your personal data has been handled in a way that does not comply with data protection law

If you would like to exercise any of your rights above, please contact us at info@castlehillha.co.uk or view the Data Protection – Subject Access Request form on our website. You should note that your rights under the UK GDPR and 2018 Act are not absolute and are subject to qualification.

In addition you have certain rights where we use automated decision making in respect of you or your personal data (and will inform you of any such processing and those rights should we use any such processes.

If you have any complaints about the way your data is processed or handled by us, please contact info@castlehillha.co.uk

If you remain unsatisfied after your complaint has been processed by us, you also have the right to complain to the Information Commission in relation to our use of your information. The Information Commissions contact details are noted below:

The Information Commission – Scotland
6th Floor, Quartermile One, 15 Lauriston Place, Edinburgh, EH3 9EP

Telephone: 0303 123 1113

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 personal information.

*August 2026*