

PINEVIEW HOUSING ASSOCIATION LIMITED

TRANSPARENCY STATEMENT (ACCESS TO INFORMATION REQUESTS)

The Association is the controller of the personal information that it holds about you when you make a request for information to the Association under the Freedom of Information (Scotland) Act 2002 (FOISA) and / or the Environmental Information (Scotland) Regulations 2004 (EISRs) (referred to in this statement as a “request for information”). This means that the Association is legally responsible for how it holds and uses personal information about you. It also means that the Association is required to comply with data protection laws when holding and using your personal information. This includes providing you with the details contained within this statement of how the Association holds and uses your personal information, who it may be shared with and your rights in relation to your personal information.

The Association has appointed a Data Protection Officer (DPO), Daradjeet Jagpal, who ensures that it complies with data protection laws. If you have any questions about this statement or how the Association holds or uses your personal information, please contact the DPO by: e-mail at pineviewdpo@infolawsolutions.co.uk; telephone on 07575 838 625; or writing to: The Data Protection Officer, Pineview Housing Association Limited, 5 Rozelle Avenue, Drumchapel, Glasgow, G15 7QR.

1. What personal information does the Association hold and use about you?

When you make a request for information to the Association, the Association holds and uses the personal information that you provide to the Association as part of the request for information and / or other personal information that the Association may obtain about you from any other correspondence with you about your request. This includes your:

- name;
- address;
- e-mail address;
- telephone number;
- request for information; and
- bank account details.

If you specify that you would like the information to be disclosed to you in a particular format, for example, large print, Braille or audio tape or if you provide any other personal information to help the Association to process and respond to your request for information, then the Association will also hold and use this personal information about you.

If you do not provide the Association with the above personal information, the Association may not be able to process your request for information and it may be refused by the Association.

2. Why does the Association hold and use this personal information about you?

The Association uses such personal information to:

- comply with its legal duties and obligations to process your request for information and request for review in accordance with FOISA and / or the EISRs;

- contact you to clarify your request for information or request for review;
- provide you with advice and assistance in relation to your request for information or request for review;
- process payment of the fee for providing you with the information that you have requested;
- comply with its legal duties and obligations under equalities law when processing your request for information;
- monitor the Association's compliance with FOISA and the EISRs; and
- protect and defend its legal rights if you apply to the Scottish Information Commissioner in relation to your request for information.

3. What is the Association's legal basis for holding and using your personal information?

Data protection laws require the Association to have a legal reason for holding and using your personal information.

The Association's legal reasons for holding and using your personal information include that the holding and use is necessary for complying with its legal duties and obligations under FOISA and / or the EISRs.

If you provide any sensitive personal information about you to the Association as part of your request for information, the Association's legal reason for holding and using such personal information is that it is necessary for reasons of substantial public interest for the exercise of a function conferred on the Association by FOISA and / or the EISRs.

4. Who does the Association share your personal information with?

The Association may share your personal information with the following organisations for the purposes described in section 2 of this statement:

- Scottish Information Commissioner, if you apply to the Commissioner in relation to your request for information;
- Scottish Housing Regulator, if the Association is required to report a notifiable event to the Regulator regarding the processing of your request for information; and
- the Association's advisers, auditors, consultants, solicitors and IT service providers.

5. How long does the Association keep your personal information?

The Association will only keep your personal information for as long as it needs to for the purposes described in section 2 of this statement, including to meet any legal, reporting or regulatory requirements. More information is contained in the Association's data retention policy, which is available by contacting the DPO.

6. What rights do you have in relation to your personal information that the Association holds and uses?

Under certain circumstances, the law gives you the right to request:

- A copy of your personal information and to check that the Association is holding and using it in accordance with legal requirements.
- Correction of any incomplete or inaccurate personal information that the Association holds about you.
- Deletion of your personal information where there is no good reason for the Association continuing to hold and use it.
- Suspension of the use of your personal information by the Association, for example, if you want the Association to check that it is correct or verify the reason for processing it or to stop the Association from using your personal information altogether if the Association has committed a breach of data protection laws.

Please contact the DPO if you wish to make any of the above requests. When you make a request, the Association may ask you for specific information to help confirm your identity for security reasons. You will not need to pay a fee when you make any of the above requests, but the Association may charge a reasonable fee or refuse to comply if your request for a copy of your personal information is clearly unfounded or excessive.

7. Feedback and complaints

The Association welcomes your feedback on how it holds and uses your personal information, and this can be sent to the DPO.

You have the right to make a complaint to the Information Commissioner, the UK regulator for data protection, about how the Association holds and uses your personal information. The ICO's contact details are as follows:

Telephone: 0303 123 1113

Website: <https://ico.org.uk/concerns/>

If you would like to receive this statement in alternative format, for example, large print, Braille or audio tape, please contact the Association.

8. Updates to this statement

The Association may update this statement at any time, and will provide you with an updated version when required to do so by law.

Last updated: September 2019