

Privacy Notice – Tenants, Applicants & Others

(How we process your personal data)

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 process your personal data.

Who are we?

Atrium Homes is:

- a Scottish Charity (Scottish Charity Number SC028506),
- a Registered Social Landlord (Registered Number 305),
- a company limited by Guarantee (SC190351)

Our Registered Office at 14 Central Avenue, Kilmarnock, KA1 4PS. Atrium Homes (“we” or “us”) take the issue of security and data protection very seriously. We comply with all relevant data protection laws, including the UK General Data Protection Regulation, the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations.

We are notified as a Data Controller with the Office of the Information Commissioner under registration numbers Z5916972 and we are the data controller of any personal data that you provide to us.

Our Data Protection Lead is the Chief Executive. Our Data Protection Officer (DPO) is provided by RGDP LLP, who can be contacted either by phone on 0131 222 3239 or by email: info@rgdp.co.uk.

Any questions relating to this notice and our privacy practices should be sent to the following email addresses: DPO@atrium-homes.co.uk or info@rgdp.co.uk. Alternatively, you can contact us by writing to us at our Registered Office.

How we collect information from you and what information we collect

We collect information about you:

- when you apply for housing with us, become a tenant, request services/ repairs, enter into a factoring agreement with ourselves howsoever arising or otherwise provide us with your personal details
- 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;
- 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);
- CCTV imagery
- to attend to the termination of your tenancy, including liaising with utility companies regarding any sums which you allegedly owe them; and

We may collect the following information about you (if applicable):

- Name;
- Address;
- Telephone number;
- E-mail address;
- National Insurance Number;

- Next of kin details;
- Date of birth;
- Signature;
- Unacceptable behaviour records and criminal activity;
- Household composition, including details of existing accommodation arrangements and family members seeking accommodation with the applicant;
- Tenancy details, including start and end dates, rent paid, under and over payments and arrears;
- Repairs: repairs requested, access details and completion dates;
- Shareholding membership number;
- Protected characteristics data, as defined by the Equality Act 2010;
- Personal characteristics such as gender and ethnic group;
- Health Information relevant to application or tenancy;
- Employment details, including benefit / council tax status and payments;
- Bank details, and;
- Carer's details

We may also record factual information whenever you contact us or use our services, as well as information about other action we take, so that we have an accurate record of what happened.

We may 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, Social Services and/or Local Authorities;
- Reports as to the conduct or condition of your tenancy, including references from previous tenancies, and complaints of anti-social behaviour;
- Medical reports for medical adaptations and Social Work reports for applications;
- Tracing and Employment details from debt collection agencies;
- Contractors and suppliers who have undertaken works on our behalf;
- Legal advisors;
- Health professionals
- Local Authorities;
- Charities;
- MPs, MSPs and councillors;
- Other registered social landlords;
- Utility companies,
- Household members

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 obligations and duties to you in accordance with the terms of our contract with you
- 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 or supplies which may affect you;
- for all other purposes consistent with the proper performance of our operations and business; and

- to contact you for your views on our products and services.

Sharing of Your Information

We may disclose your personal data to any of our employees, officers, contractors, insurers, professional advisors, agents, suppliers or subcontractors, utility companies, government agencies and regulators, local councils and healthcare providers insofar as reasonably necessary, and in accordance with data protection legislation.

We may also disclose your personal data:

- If we enter into a joint venture with or merge with another business entity, your information may be disclosed to our new 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 and others involved in any complaint, whether investigating the complaint or otherwise;
- If we are updating tenancy details, your information may be disclosed to third parties (such as utility companies and Local Authority / Council and/or Council departments);
- If we are investigating payments made or otherwise, your information may be disclosed to payment processors, Local Authority / Council and/or Council departments, and the Department of Work & Pensions;
- With our Data Protection Team and/or Legal Advisors;
- 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;
- If you are using an advice or advocacy service (such as a solicitor, advice agency or otherwise) we will share relevant information with them where it is necessary to progress your case;
- If you request that we share your information with other RSLs who may assist in re-housing you;
- If your household is threatened with homelessness, your information may be shared between us and Local Health Authority and Social Care Partnership(s);
- If we are pursuing debts associated with a tenancy or a former tenancy we may share your basic information with a third party agency to assist in the recovery of those debts;
- If we are making an insurance claim following an incident we may share your information with our insurers;
- If we are being audited then we may share your information with our auditors;
- Where there is a legal action that involves you such as action to recover a tenancy your information may be shared with a solicitor to assist in the legal process;
- To fulfil our legal and regulatory obligations to bodies such as the Scottish Housing Regulator, Financial Conduct Authority or the Office of the Scottish Charity Regulator;
- To conduct our day-to-day management of your agreement or potential agreement with us;
- With your consent; and/or
- As otherwise required by law

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.

What are the lawful bases for us processing your personal data?

We will only process your personal data on one or more of the following legal bases:

- contract
- consent
- our legitimate interests (including CCTV recordings and void property management)
- vital interests

- the performance of a task carried out in the public interest and / or with official authority
- legal obligation

Special categories of personal data

Special categories of personal data means 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.

The "special categories" of sensitive personal information referred to above require higher levels of protection. We need to meet additional legal requirements for collecting, storing and using this type of personal data.

Transfers outside the UK

Your information will only be processed within the UK, except where international transfers are authorised by law.

Security

When we process your personal data we take steps to make sure that your personal data is kept secure and safe. This includes ensuring there is adequate IT and physical security for all locations that data is stored and we ensure that these measures are tested on a regular basis to ensure compliance. All information is kept in line with our data protection policies and procedures, which are available on our website or from reception.

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 / best practice or as set out in any relevant contract we have with you.

Our full retention guidelines are available on our website, or a copy can be requested from our registered office.

Your rights

You have the right at any time to request us to exercise your data subjects' rights in relation to the following:

- the right to be informed
- the right to access
- the right to rectification
- the right to object to processing
- rights in relation to automated decision making and profiling
- the right to be forgotten
- the right to data portability
- the rights to restrict processing

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

If you would like to exercise any of your rights above please contact: **DPO@atrium-homes.co.uk** or **info@rgdp.co.uk**.

Queries and Concerns

If you have any queries or concerns about our use of your personal data, you can raise these with us by either contacting:

Atrium Homes: DPO@atrium-homes.co.uk
DPO (RGDP LLP): info@rgdp.co.uk or 0131 222 3239

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:

Telephone: 0303 123 1113
Online: [Make a complaint | ICO](#)

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.

V3: This Privacy Notice was last updated on 15 February 2024.