



TRANPARENCY STATEMENT

HOW WE USE YOUR PERSONAL INFORMATION (FACTORED OWNER)

Molendinar Park Housing Association is the controller of the personal information that it holds about you which means that we are legally responsible for how we hold and use personal information about you. It also means that we are required to comply with data protection laws when holding and using 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 molendinar@infolawsolutions.co.uk; telephone on 07575 838 625 or writing to: The Data Protection Officer, Molendinar Park Housing Association Limited, 3 Graham Square, Glasgow G31 1AD.

You can also contact the Association by: e-mail at admin@molendinar.org.uk telephone on 0141 564 5256; or writing to: Molendinar Park Housing Association Limited, 3 Graham Square, Glasgow G31 1AD.

Your attention is particularly drawn to section 2 of this statement, which confirms that you consent to your personal information and sensitive personal information being held and used by us as described in section 1 of this statement.

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

As part of your factoring agreement with us, we hold and use the personal information that you provided to us and/or other personal information that we may obtain about you from you and third parties on an ongoing basis.

We use such personal information for the following purposes:

- providing you with services as the factor of your property;
- communicating with you, including in response to any of your enquiries; notify you of any major repairs required to the common parts of the building in which your

property is located; invite you to attend owners' meetings; and ask you to complete satisfaction surveys;
improving our services and responding to changing needs;

- factoring management and administration, including: carrying our repairs to te common parts of the building in which your property is located and processing your common charges and/or service charge invoices and payments;
- recovering any outstanding charges from you; and
- Keeping the personal information that we hold about you accurate and up-to-date;

2. 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.

In some circumstances, we may rely on your consent as the legal reason. By providing us with your personal information and sensitive personal information (including your racial or ethnic origin, sexual orientation, your physical and/or mental health, religious or other similar beliefs and/or political opinions) and the personal information and sensitive personal information of other individuals (including other members of your household), you:

- Consent to it being used by us as described in section 1 of this statement; and
- Confirm that you have informed the other individuals if they are of 12 years old and above of the content of this statement and they have provided their consent to their personal information and sensitive personal information being used by us as described in section 1 of this statement.

You and the other members of your household have the right to withdraw your consent to us holding and using your and their personal information and sensitive personal information by contacting us. Once you/they have withdrawn your/their consent, we will no longer use your/their personal information for the purpose(s) set out in section 1 of this statement, which you originally agreed to, unless we have another legal reason for doing so.

Other legal reasons for holding and using your personal information are:

- performance and management of the factoring agreement between us;
- legal and regulatory obligations which apply to us as a property factor;
- protection of your vital interests; and
- our legitimate interests – while you have a legitimate interest in the protection of your personal information, we also have an overriding legitimate interest in handling and using your personal information, including sharing it with our contractors and service providers (listed in section 3 of this statement, for the purposes described in section 1 of this statement.

3. 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 1 of this statement:

- our contractors to undertake repairs, works and maintenance to the common parts of the building in which property is located;
- our service providers to maintain the systems on which your personal information is stored, including our housing management software, and to allow you to make payments of charges to us;
- our solicitors to recover any outstanding charges when you sell your property.

4. 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 1 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.

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

It is important that the personal information that we hold about you is accurate and current. Please keep us informed of any changes. 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. You also have the right to ask us to do this where you object to us holding and using your personal information (details below).
- temporarily suspend the use of your personal information by the Association, for example, if you want the Association to check that it is correct or the reason for processing it.
- the transfer of your personal information to another organisation.

You can also object to us holding and using your personal information where our legal basis is a legitimate interest (either our legitimate interests or those of a third party).

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.

6. 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.

7. 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 2020