



HOW WE USE YOUR PERSONAL INFORMATION (MEMBERS)

We, Molendinar Park HA, are the controller of the personal information that we hold about you. This 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. This includes providing you with the details contained within this statement of how we hold and use your personal information, who we may share it with and your rights in relation to your personal information.

We have appointed a Data Protection Officer (DPO), Daradjeet Jagpal, who ensures that we comply with data protection laws. If you have any questions about this statement or how we hold or use your personal information, please contact the DPO by: e-mail at molendinar-dpo@infolawsolutions.co.uk; telephone on 07307 051 295; or writing to: The Data Protection Officer, Molendinar Park Housing Association Limited, 3 Graham Square, Glasgow, G31 1AD.

You can also contact us 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 3 of this statement, which confirms that you consent to your personal information being held and used by us as described in section 2 of this statement.

1. What personal information do we hold and use about you?

As part of your membership, we hold and use the personal information that you provide to us and / or other personal information that we may obtain about you from you on an ongoing basis. This includes your:

- name;
- address;
- gender;
- date of birth;
- emergency contact / next of kin information;
- tenure;
- reason(s) for becoming a member;
- relevant skills and experience;
- attendance at annual general meetings; and

- sensitive personal information about your racial or ethnic origin, sexual orientation, physical and / or mental health and religious or other similar beliefs.

If you are a tenant or service user of the Association, then we will also hold and use your personal information in accordance with the “How We Use Your Personal Information” statements issued to our tenants and service users.

If you do not provide us with the above personal information, you may not continue to be a member.

2. Why do we hold and use this personal information about you?

We use such personal information to:

- manage and administer your membership;
- comply with regulatory requirements and our legal duties and obligations, including undertaking membership skills assessments;
- promote equality of opportunity; and
- protect and defend our legal rights in the case of a dispute between us.

3. What is our legal basis for holding and using your personal information?

Data protection laws require us to have a legal reason for holding and using your personal information. Our legal reasons for holding and using your personal information include:

- compliance with the laws which apply to us as a registered social landlord in Scotland; and
- protection of our legitimate interests – in the highly unlikely event that we do not have another legal reason, we may consider that we have a legitimate interest in handling and using your personal information. In those circumstances, we will always consider your legitimate interests in the protection of your personal information, and will balance those against our own legitimate interests in handling and using your personal information for the purposes described in section 2 of this statement.

In very limited 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, and religious or other similar beliefs) and the personal information and sensitive personal information of other individuals (for example, your emergency contact / next of kin or dependents), you:

- consent to it being used by us as described in section 2 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 2 of this statement.

You and the individuals 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 and sensitive personal information for the purpose(s) set out in section 2 of this statement, which you originally agreed to, unless we have another legal reason for doing so.

4. Who do we share your personal information with?

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

- Scottish Housing Regulator;
- our financial advisers, consultants, solicitors and IT service providers; and
- the Police (in the case of actual or suspected criminal activity).

5. How long do we keep your personal information?

We will only keep your personal information for as long as we need to for the purposes described in section 2 of this statement, including to meet any legal, accounting, reporting or regulatory requirements. More information is contained in our data retention policy, which is available by contacting our DPO.

6. What rights do you have in relation to your personal information that we hold and use?

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 we are holding and using it in accordance with legal requirements.
- Correction of any incomplete or inaccurate personal information that we hold about you.
- Deletion of your personal information where there is no good reason for us 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, for example, if you want us to check that it is correct or the reason for processing it or to stop us from using your personal information altogether if we have committed a breach of data protection laws.
- The transfer of your personal information to another organisation.

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

Please contact our DPO if you wish to make any of the above requests. When you make a request, we may ask you for specific information to help us confirm your identity for security reasons. You will not need to pay a fee when you make any of the

above requests, but we may charge a reasonable fee or refuse to comply if your request for access is clearly unfounded or excessive.

7. Feedback and complaints

We welcome your feedback on how we hold and use your personal information, and this can be sent to our DPO.

You have the right to make a complaint to the Information Commissioner, the UK regulator for data protection, about how we hold and use 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, audio, large print or braille, please contact us.

8. Updates to this statement

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

Last updated: September 2020