

Privacy Notice for Governing Body members and applicants

Wellhouse Housing Association

How we use your personal information

Introduction

Wellhouse Housing Association controls and processes a range of personal information about you. In this privacy notice 'personal information' means your personal data i.e. information about you from which you can be identified. Your personal information does not include data where your identity has been removed (anonymous data). It is important that the personal information that we hold and process about you is accurate and up to date. Please keep us informed if your personal information changes during your engagement with us.

This Privacy Notice explains what personal information we collect about you, when we collect it, how we process it and how we use this. During the course of our activities, we will process personal data about you (which may be held on paper, electronically, or otherwise) and we recognise the need to treat it in an appropriate and lawful manner.

The purpose of this Privacy Notice is to explain to you the reasons why we may hold and process your personal data and explain your rights under the current data protection laws. This privacy notice explains how we collect and use personal information about our Governing Body Members and applicants to the governing body.

Separate versions of Privacy Notices are issued to our tenants, customers, employees website users, and suppliers, contractors and other business contacts.

Who are we?

Wellhouse Housing Association, Recognised Scottish Charity No SC036552, Scottish Housing Regulator No HAC281, Co-operative and Community Benefit Societies Act No 2469R (S), Property Factor Registration number PF000109 and having their Registered Office at The Hub, 49 Wellhouse Crescent, G33 4LA, Glasgow We take the issue of security and data protection very seriously and strictly adhere to guidelines published in the Data Protection Act of 2018 (the 2018 Act) and the UK

General Data Protection Regulation (UK GDPR), the Data Use and Access Act 2025 (DUAA) together with any domestic laws subsequently enacted.

We are registered as a Data Controller with the Office of the Information Commission (IC) under registration number Z5916557 and we are the data controller of any personal data that you provide to us.

Our Data Protection Officer (DPO) is:

RGDP LLP, Level 2, One Edinburgh Key, 133 Fountainbridge, Edinburgh EH3 9QG

Tel: 0131 222 3239

Email: info@rgdp.co.uk

Any questions relating to this notice and our privacy practices should be sent to dpo@wellhouseha.org.uk.

What information do we collect?

We collect the following information from you, both from information you have supplied through membership of the Association forms or any other instance where you have provided us with your personal information. We do not routinely receive any additional information from third parties. We may collect the following:

- Name
- Date of Birth
- Telephone Number
- Address
- E-mail address
- Signature
- National Insurance Number
- Protected characteristics under the Equality Act 2010, including age, disability, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation
- Qualifications
- Details concerning health or any disability
- Occupation
- Bank account details (when applicable)
- Register of interest
- Standard disclosure checks
- Photographs
- Relationship with current board members and / or staff
- Positions with public responsibilities
- Legal & financial declarations
- Membership and directorships held, together with duration
- Training records
- Video and audio for communications
- CCTV Imagery
- Telephone call recordings

We may collect and use the above information and personal data for:

- Administration duties
- Payment of any out-of-pocket expenses
- Recruitment and selection
- Appraisal, training and development
- Membership of professional bodies
- Health, safety and wellbeing
- Equality monitoring
- Regulatory reporting

Who might my data be shared with, or seen by?

We may disclose your personal data to any of our employees, officers, contractors, insurers, professional advisors, agents, suppliers or subcontractors, selected third parties, government agencies and regulators and healthcare providers so far as reasonably necessary, and in accordance with data protection legislation.

We may also disclose your personal data:

- with your consent
- to the extent that we are required to do so by law
- to comply with any regulatory requirements
- to protect the rights, property and safety of our employees and other Board / Committee members, our tenants, users of our website and other persons
- in connection with any ongoing or prospective proceedings
- if we are investigating a complaint, information may be disclosed to solicitors, independent investigators, including auditors, the Scottish Housing Regulator, and other regulatory bodies, whether investigating the complaint or otherwise
- to the purchaser (or prospective purchaser) of any business or asset that we are, or are contemplating, selling;
- to another organisation if we enter into a joint venture or merge with another organisation.

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

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

- Contract, including pre-contract negotiations
- Consent
- Vital interests
- The performance of a task carried out in the public interest and / or with official authority
- Where we have a legal obligation to do so
- Our legitimate interests (including CCTV recordings, telephone call recordings, maintenance of disaster recovery plans, recording next of kin details, etc)

- Where there is a redefined legitimate interest, as defined under the Data (Use and Access) Act 2025 and by the relevant Secretary of State.

Processing special category 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 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 information.

Our legal basis for processing your special category data is:

- a) Explicit consent
- b) Employment, social security and social protection (if authorised by law)
- c) Vital interests
- d) Not-for-profit bodies
- e) Made public by the data subject
- f) Legal claims or judicial acts
- g) Reasons of substantial public interest (with a basis in law)
- h) Health or social care (with a basis in law)
- i) Public health (with a basis in law)
- j) Archiving, research, and statistics (with a basis in law)

Where do we keep your data?

Your information will only be stored within the United Kingdom, except where international transfers are authorised by law.

How do we keep your data safe?

When we are provided with personal data, we take steps to make sure that your personal information is kept secure and safe. All data is held in accordance with Wellhouse Housing Association's data protection policies and procedures. Our systems are password protected and all electronic data is stored securely. All paper files are kept in locked cabinets.

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.

Your rights

You have rights in relation to your personal data and can ask us for the following:

- To access information about the personal data we are processing and to obtain a copy of it;
- To change incorrect or incomplete data;
- To erase or stop processing your data (in certain circumstances);
- To stop sending you marketing messages; and
- To object to certain processing activities.

If you would like to exercise any of your rights above please contact us at dpo@wellhouseha.org.uk in the first instance. You should note that your rights under the UK GDPR and 2018 Act are not absolute and are subject to qualification.

Keeping information up to date

It is important that the personal information that we collect, hold and use about you is accurate and current. To help us keep our records up to date you are required to inform us of any changes to your personal and contact details.

Queries and Complaints

If you are not satisfied with our handling of your request, in the first case you should contact us with your complaint so that we can investigate. Complaints over handling your rights should be sent to dpo@wellhouseha.org.uk and marked GDPR Complaint.

Our Data Protection Officer is provided by RGDP LLP and can be contacted directly either via 0131 222 3239 or info@rgdp.co.uk

If you still 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 Commission's contact details are noted below:

Information Commission
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Website: www.ico.org.uk
Telephone: 0303 123 1113
Online: <https://ico.org.uk/make-a-complaint/>

Review

This version reviewed February 2026. Next review February 2029, or sooner if there is a change to how we process your data.