



The Hynish Trust is a Scottish Charitable Incorporated Organisation (SCIO).
Charity number SC038956. Registered Landlord # Pending

HOUSING DATA PRIVACY POLICY



The Hynish Trust
Lighthouse Shore Station
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Hynish Trust

Keepers of the Hynish Lighthouse Shore Station

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Background

The UK General Data Protection Regulation (UK GDPR) entered into force in the UK in 2018, repealing previous Data Protection Acts.

Your data privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights. This Housing Data Privacy Policy applies to data processed by or on behalf of The Hynish Trust and lets you know what happens to your personal data that you give to us or any data that we may collect from or about you.

This Policy describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you according to the UK GDPR 2018 Regulations.

This Policy explains

- Who we are and how we use your information
- What kinds of personal information about you that we process
- What the legal grounds are for our processing of your personal information (including when we share it with others)
- Retention of your personal information
- What your rights are under data protection laws.

The Hynish Trust is registered with the [Information Commissioners Office](#) (ICO). The Hynish Trust (the Trust) is responsible for protection of your housing related data and is, as such, referred to as the 'Data Controller' for Data Protection Purposes.



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1. What information do we collect?

We collect personal data as part of the Housing application, allocation and management process such as:

- your contact information
- any references obtained in the course of setting a tenancy up
- your rent payment history and, in some cases, other financial details
- your employment details
- and, in some cases, sensitive information like health conditions.

2. Why do we process your data?

The data is collected, typically, for:

- complying with legal obligations
- tenancy application processing
- managing a tenancy
- fulfilling a contract in relation to a tenancy
- for housing related legitimate business interests.

3. What is the legal basis for collecting this data?

We need to ask you for your personal, sensitive and confidential data in order to provide a housing related service to you.

Under the General Data Protection Regulation, we will be lawfully using your information in accordance with Article 6, (b) Necessary for performance of/entering into contract (or relationship) with you.

4. How do we make sure your data is kept securely?

We are committed to protecting your privacy and will only use information collected lawfully in accordance with:

- Data Protection Act 2018
- The UK General Data Protection Regulations 2016



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- Human Rights Act 1998
- Common Law Duty of Confidentiality (Scotland)
- The Hynish Trust Information Security and Records Management Policies, Procedures and Principles.

We will not disclose your information to any third party without your permission unless there are exceptional circumstances where the law requires information to be passed on (for example, emergency services).

Our policy is to respect the privacy of our service users and to maintain compliance with all UK specific Data Protection Requirements.

All data captured by us on paper is scanned in to our computer system to create an electronic file and the original paper copy destroyed by shredding within 28 days, by the member of Trust Staff responsible for capturing it.

All electronic data (for example, digital forms, documents, photographs and videos) are also copied to our secure server and the original files deleted on the equipment used to capture by the member of the Trust Staff responsible for capturing them within 28 days.

All the personal data we hold is processed and stored on a secure server.

No 3rd parties have access to your personal data unless the law allows them to do so and appropriate safeguards have been put in place.

We have a Data Protection and Security regime in place to oversee the effective and secure processing of your personal and/or special category (sensitive, confidential) data.

5. Who are our partner organisations?

We may also have to share your information, subject to strict agreements on how it will be used, for example, with the following organisations:

- Local Authorities



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- OSCR (Office of Scottish Charity Regulator)
- Funders
- Emergency Services

You will be informed who your data will be shared with and in some cases asked for consent for this to happen when this is required.

We may also use external companies to process personal information. These companies are bound by contractual agreements to ensure information is kept confidential and secure.

6. How long will we store your information?

We are required under UK law to keep your data no longer than is reasonably required.

If you discontinue use of our Housing services, we will delete all of your data within 28 days.

7. How can you access, amend, move your personal data?

Even if we already hold your personal data, you still have various rights in relation to it. To get in touch about these, please contact The Hynish Trust in writing.

We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of any applicable laws.

Please note that we may keep a record of your communications to help us resolve any issues which you raise.

8. Right to object

If we are using your data because we deem it necessary for our legitimate housing related interests to do so, and you do not agree, you have the right to object in writing to the The Hynish Trust.



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We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases). Generally, we will only disagree with you if certain limited conditions apply.

9. Right to withdraw consent

Where we have obtained your consent to process your personal data for certain activities (for example for a research project), you may withdraw your consent at any time.

10. Right to erasure

In certain situations (for example, where we have processed your data unlawfully), you have the right to request us to "erase" your personal data. Please contact the Trust in writing.

We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases) and will only disagree with you if certain limited conditions apply. If we do agree to your request, we will delete your data.

11. Access to your personal information

Data Subject Access Requests (DSAR): You have a right under the Data Protection legislation to request access to view or to obtain copies of what information this organisation holds about you and to have it amended should it be inaccurate. Your request should be made in writing to The Hynish Trust.

Please note:

- There is no charge to have a copy of the information held about you
- We are required to respond to you within one month.



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12. If your personal information changes

You should tell us so that we can update our records – please contact your Hynish Trust key contact/liaison person as soon as any of your details change.

13. Objections/Complaints

Should you have any concerns about how your information is managed, please contact The Hynish Trust in the first instance.

If you are still unhappy following a review, you have a right to lodge a complaint with the UK Supervisory Authority (ICO) as below.

Information Commissioners Office
Wycliffe House, Water Lane
Wilmslow
Cheshire SK9 5AF

Web: <https://ico.org.uk/>

Tel: 01625 545745

14. Contact Us

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