

Privacy Notice for SBHA Shareholders

What we need

Scottish Borders Housing Association (SBHA) will be a "controller" of the personal information that you provide to us through your application for Shareholding Membership of SBHA.

When you apply for Shareholding Membership, we will ask you for the following personal information:

- contact details – name, address, email address, contact telephone number(s), date of birth;
- the details of any member of SBHA staff, or Governance Member, to whom you are related or is your partner; and
- equality information – gender, marital status, sexual orientation, ethnicity, religion/belief, disability;

Why we need your personal information – legal obligations

We are under a legal obligation to process certain personal information relating to our Shareholder Members for the purposes of complying with our obligations under:

- the Co-Operative and Community Benefit Societies Act 2014 and Charities and Trustee Investment (Scotland) Act 2005 to maintain a register of our Shareholders (which includes our Shareholding name, address, the date they were admitted to membership and the date on which they ceased to be a Shareholder), and hold general meetings, including issuing notices and voting arrangements; and
- the Equality Act 2010, which requires us to process personal information to make reasonable adjustments where necessary.

Why we need your personal information – legitimate purposes

We also process your personal information in pursuit of our legitimate interests to:

- issue communications to you to keep you informed about SBHA; and
- produce anonymised statistical reports on the makeup of SBHA's Shareholding Membership to monitor its representativeness of the communities that we serve.

Where we process your personal information in pursuit of our legitimate interests, you have the right to object to us using your personal information for the above purposes. If you wish to object to any of the above processing, please contact us by emailing us at enquiries@sbha.org.uk, or writing to us at SBHA, South Bridge House, Whinfield Road, Selkirk, TD7 5DT. If we agree and comply with your objection, this may affect your ability to be a Shareholding Member of SBHA.

Why we need your personal information – equality monitoring requirements

We use your personal information relating to your gender, age, marital status, sexual orientation, ethnicity, religion/belief and disability to help us identify and keep under review the existence or absence of equality of opportunity or treatment between groups of people within the same categories to promote or maintain equality within SBHA.

Other uses of your personal information

We may ask you if we can process your personal information for additional purposes. Where we do so, we will provide you with an additional privacy notice with information on how we will use your information for these additional purposes.

Who we share your personal information with

We may be required to share personal information with statutory or regulatory authorities and organisations to comply with statutory obligations. Such organisations include the Scottish Housing Regulator for the purposes of evidencing the composition of our Shareholding Membership.

As a Shareholding Member of SBHA, your name and address will also become part of SBHA's Shareholder Register, which is available to view to members of the public on request at SBHA's Head Office. This is a legal requirement as set out above.

We may also share personal information with our professional and legal advisors for the purposes of taking advice.

In the event that we do share personal information with external third parties, we will only share such personal information strictly required for the specific purposes and take reasonable steps to ensure that recipients shall only process the disclosed personal information in accordance with those purposes.

How we protect your personal information

Your personal information is stored on our electronic filing system and our servers based in the UK, and is accessed by our employees for the purposes set out above. Where hard copies of documentation are retained in line with SBHA's data retention schedule, these will be stored securely at SBHA's Head Office (or secure offsite storage).

We will not ordinarily transfer your data outwith the EU. If this position changes and your personal information is proposed to be transferred outwith the EU, we will provide you with information regarding the safeguards that we have put in place with the recipient country to protect your personal information.

How long we keep your personal information

We will only keep your personal information for as long as necessary to administer your Shareholding Membership in line with SBHA's Rules, Standing Orders, Policies and Procedures, and to safeguard SBHA in the event of any claims, complaints, litigation, enquiries or investigations during or following the your time as a Shareholding Member. Unless you ask us not to, we will review and possibly delete some of your personal information after you have ceased to be a Shareholder for 6 years.

We are also legally required to permanently maintain a register of all Shareholders under section 30 of the Co-operative and Community Benefit Societies Act 2014. The details retained will be: name; postal address; email address (if notified); number of shares and amount paid; statement of property; date entered as member; and date membership ceased (if applicable).

We have a data retention schedule that sets out the periods for retaining and reviewing all information that we hold. This sets out different retention periods and you can request a copy by emailing us at enquiries@sbha.org.uk, or writing to us at SBHA, South Bridge House, Whinfield Road, Selkirk, TD7 5DT.

Your rights

You can exercise any of the following rights by emailing us at enquiries@sbha.org.uk, or writing to us at SBHA, South Bridge House, Whinfield Road, Selkirk, TD7 5DT.

Your rights in relation to your personal information are:

- you have a right to request access to the personal information that we hold about you by making a "subject access request";
- if you believe that any of your personal information is inaccurate or incomplete, you have a right to request that we correct or complete your personal information;
- you have a right to request that we restrict the processing of your personal information for specific purposes; and
- if you wish us to delete your personal information, you may request that we do so.

Any requests received by SBHA will be considered under applicable data protection legislation. If you remain dissatisfied, you have a right to raise a complaint with the Information Commissioner's Office at www.ico.org.uk