

Privacy Notice for Factoring Customers

What we need

Scottish Borders Housing Association (SBHA) will be a "controller" of the personal information that we hold in relation to the factoring service provided by SBHA. We hold the following personal information:

- contact details – your name and address, contact telephone number and email address (where applicable);
- address of the factored property you own (if different from your contact address); and
- payment records for invoices generated for the factoring service.

Why we need your personal information – contractual purposes

We need to collect your personal information so that we can provide you with the factoring service. We will use your personal information for these purposes to invoice you and take payment for the balance due to provide this service, and keep a record of payments made to the relevant account.

If you do not provide us with all of the personal information that we need to provide this service then this may affect our ability to provide the factoring service.

Why we need your personal information – legitimate purposes

We also process your personal information in pursuit of our legitimate interests to monitor phone calls, emails, letter and any other correspondence related to your factoring service to enable us to provide a continuous service to you no matter who you contact at SBHA, and to undertake research to improve our services.

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 our ability to provide services to you.

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

SBHA also employs third party suppliers to provide services, as set out below. These suppliers may process personal information on our behalf as "processors" and are subject to written contractual conditions to only process that personal information under our instructions and protect it.

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.

These third parties include tracing and debt collection agencies, in the event that you owe money to SBHA in relation to the factoring service provided. We may also share your information (specifically your name and contact details) with our satisfaction survey providers, only so that they can contact you to provide feedback on the service that SBHA provides.

How we store 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, Area Offices 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 personal information for as long as necessary to manage your factoring service, and to safeguard SBHA in the event of any claims, complaints, litigation, enquiries or investigations during or following the termination of your factoring service.

Unless you ask us not to, we will review and possibly delete personal information 6 years after the factoring service provided to you ends.

We may keep certain personal information for longer in order to confirm your identity and the details of the factoring service that you receive(d). We need to do this to in the event of a claim against SBHA.

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