Cunninghame Housing Association Limited

Privacy Notice - Lemon Aid Fuel Poverty Advice Service

Introduction

The purpose of this privacy notice is to explain why Cunninghame Housing Association Limited holds and uses your personal information and your rights under the current data protection laws.

We are committed to being transparent about how we collect, use, and retain your personal information, and meet our data protection obligations. We will collect and process your personal information when you contact the Lemon Aid Fuel Poverty Advice Service, a serviced provided by Cunninghame Housing Association Limited.

Cunninghame Housing Association Limited is the data controller, which means we are responsible for deciding how we hold and use your personal information.

We may amend this notice at any time and we will let you know if we do. This version was last reviewed in February 2024.

Data Controller

Cunninghame Housing Association Limited Quayside Marina Quay Dock Road Ardrossan KA22 8DA

We are registered as a data controller with the Information Commissioner and our registered number is Z6489501.

Data Protection Officer

Joanna Thomson

Telephone: 01294 606040 Email: <u>DP@chaltd.org</u>

If you have any questions about this privacy notice, please contact our Data Protection Officers.

What information do we collect?

We collect and process the following information:

- Your name, address, and contact details including email address and telephone number;
- Your date of birth, National Insurance number and income details;
- Details of your energy supplier and landlord;
- Your property type and household composition;
- Information about any disability you tell us about;
- Any other information you provide to us.

This personal information is required to provide you with fuel poverty advice. If you do not provide personal information we ask for, it may delay or prevent us from providing fuel poverty advice to you.

How we get the personal information and why we have it

You give us the information directly to allow us to provide you with fuel poverty advice.

We also receive personal information indirectly in the following cases: Local charities, local authorities, development trusts, health & social care partnerships, landlords and partner organisations may send us your information if you ask them to do so when you are in need of fuel poverty advice.

We will use your information:

- to assess if you are in fuel poverty and if you are eligible for fuel vouchers;
- to apply for energy debt reduction and make external agency applications, including third party referrals, where applicable, on your behalf;
- to enable us to supply you with the services and information which you have requested;
- · to access low energy appliances;
- to enable us to respond to your requests and complaints;
- to contact you in order to send you details of any changes to our services which may affect you;
- for all other purposes consistent with the proper performance of our activities and functions in connection with fuel poverty advice; and
- to contact you for your views on our services.

We will also anonymise the information we collect and analyse the anonymised information so that we can support, improve and develop our organisation, activities and the services we offer.

Sharing your information

We will share this information with third parties where we are required to do so by law.

We may disclose your information to other third parties for the purposes set out in this privacy notice or for other purposes with your consent, including the following:

- We may share your information with your energy suppliers in order to efficiently and effectively assist in resolving issues such as metering/billing/debt issues etc. Sharing your information allows us to get to the root of the problem and find a solution that is best for your specific issues/problems.
- We will share your information with other care and support organisations if you ask us to do so in order for them to make an informed assessment on what assistance is best for you.
- Your information may be disclosed to debt grant organisations or fuel voucher organisations in order to assess your eligibility for access to funds. These funds from third party organisations are mostly discretionary funds and are therefore assessed on a case-by-case basis. We must provide full and accurate information about you to ensure an accurate assessment can be made.
- if we are conducting a survey of our services, your information may be disclosed to third parties assisting in the compilation and analysis of the survey results;

- if you have asked someone else to act on your behalf, your information may be disclosed to that representative (such as your local MP or MSP);
- if we are required to provide information under our regulatory or statutory obligations, your information may be disclosed to our regulators (such as the Scottish Housing Regulator, the Financial Conduct Authority, the Office of the Scottish Charity Register, the Information Commissioner's Office, and the Scottish Information Commissioner); and
- if we enter into a joint venture with or merge with another business entity, your information may be disclosed to our new business partners or owners.

Under data protection legislation, the lawful bases we rely on for processing this information are:

We have a contractual obligation

We need to process the information you give us to provide you with fuel poverty advice.

We have a legitimate interest

A legitimate interest is when we have a business reason to use your information. Our legitimate interests include promoting our activities, which does not include our public functions. We will only use your personal information where it is necessary to do so and where the need to protect your personal information does not override our interests.

You have provided consent

This will only apply in limited circumstances where we have clearly asked for your consent to process your personal information for a specific purpose.

How we store your personal information

Your information is securely stored in an electronic filing system and will not be transferred out of the UK.

Data Retention

We will only keep your personal information for as long as necessary to fulfil the purposes for which we collected it, including to satisfy any legal requirements.

We will keep your information for a maximum period of five years, after which it will be destroyed

Your Rights

As a data subject, you have a number of rights, as follows:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

If you would like to exercise any of the above rights, please contact our Data Protection Officers as detailed above.

If you believe that we have not complied with your data protection rights, you can complain to our Data Protection Officers or to the Information Commissioner.

The Information Commissioner's Office - Scotland

Queen Elizabeth House

Sibbald Walk

Edinburgh

EH8 8FT

Telephone: 0303 123 1115

Email: Scotland@ico.org.uk