

Privacy Notice

Shareholding Members and Board Members

Introduction

Cunninghame Housing Association Limited will be a "controller" of the personal information that you provide to us when you apply for and/or become a member or board member of Cunninghame, unless otherwise stated in this privacy notice. In this notice, any reference to "Cunninghame" includes Cunninghame Housing Association Limited and our subsidiary company, Cunninghame Furniture Recycling Company.

If any changes are made to this notice in the future, we will notify you.

Data Controller

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

Both Cunninghame Housing Association Limited and Cunninghame Furniture Recycling Company are registered as data controllers with the Information Commissioner and are Scottish charities.

Data Protection Officers

Joanna Thomson / Hazel Clark
Telephone: 01294 606040 / 01294 607585
Email: DP@chaltd.org

What information do we collect?

When you apply to and become a member or board member of Cunninghame, we collect and process the following information:

- Your name, address, email address, date of birth, next of kin details, signature and telephone number(s);
- Equality information relating to your gender, age, ethnicity and health information;
- Your occupation, employment history, qualifications, skills and training undertaken;
- Your connection to Cunninghame and eligibility to become a member or board member;
- Information relating to your attendance and participation in meetings;
- Information relating to any declaration of your interests, such as connected persons, entitlements, payments and benefits;
- Bank account details in relation to payments for expenses;
- In some circumstances, we will ask for your photograph.

How we get the personal information and why we have it

Most of the personal information we process is provided to us directly by you.

We may receive information about you from third parties where complaints are made or when membership fees are paid.

The information is used:

- to comply with the rules which form our constitution, particularly in relation to processing your application for membership;
- to maintain a register of members and board members;
- to hold meetings, including issuing notices and arranging votes;
- to make reasonable adjustments in terms of the Equality Act 2010 where that is necessary;
- to meet our regulatory requirements;
- to produce anonymised statistical reports on the makeup of Cunninghame's membership and to monitor membership representatives;
- to enable us to respond to your requests and complaints; and
- to contact you in relation to your role; and
- to promote the activities or and services provided by Cunninghame by using your photograph on our website and in other promotional materials

Information sharing

We may need to share your personal information with statutory or regulatory authorities and organisations such as the Scottish Housing Regulator, the Financial Conduct Authority and the Office of the Scottish Charity Regulator for the purposes of complying with statutory reporting requirements and evidencing the composition of our membership and board. These organisations will become controllers of your personal information upon receipt in most cases and you should refer to their privacy notices / policies for further details on how they will use your personal information.

We may also need to share information with the Information Commissioner, the Scottish Information Commissioner or the Scottish Public Services Ombudsman if a case you are involved in is referred to them.

We may share personal information with our professional and legal advisors for the purposes of taking advice, as well as our auditors where required. In the event that we do share personal information with external third parties, we will only share such personal information as is strictly required for the specific purposes and we will take reasonable steps to ensure that recipients only process the disclosed personal information for those purposes.

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

We have a contractual obligation

When you become a member or board member of Cunninghame we may need to process your personal information in order to comply with our rules (which form our constitution). Such processing includes, for example, payment of expenses to board members and processing membership applications.

Legal obligations

We are under a legal obligation to process certain personal information relating to our members and board 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 members and board members, which includes our members' and board members' name, address, the date they were admitted to membership and the date on which they ceased to be our member or board member, and to hold general meetings, including issuing notices and voting arrangements;
- the Equality Act 2010, which requires us to process personal information to make reasonable adjustments where necessary; and
- the Housing (Scotland) Act 2010, which requires us to report certain statistical data on our board members to the Scottish Housing Regulator.

Legitimate interests

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

- issue communications to keep you informed about Cunninghame;
- produce anonymised statistical reports on the makeup of Cunninghame's membership and to monitor membership representatives;
- calculate meeting attendance, record training and events attendance, record the minutes of meetings;
- improve our services and monitor the performance of our customer service team, by recording our incoming and outgoing telephone calls; and
- promote the activities or and services provided by Cunninghame by using your photograph on our website and in other promotional materials.

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 using the details set out above.

How we store your personal information

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

How long we keep your information

We will only retain your personal information for as long as necessary to fulfil the purposes for which we collected it, including to satisfy any legal, accounting or reporting

requirements. We will keep your information in line with our Retention policy and schedule, which can be found online using the links below, and will destroy or anonymise it when it is no longer required for the reasons it was obtained.

[CEO041-Record-Retention-Schedule-HM-Revised-13.04.2022-004.xlsx \(live.com\)](#)

[CEO041-Data-Retention-Policy-4.docx \(live.com\)](#)

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 usually required to pay any charge for exercising your rights. However, we may charge a reasonable fee if your request for access is clearly manifestly unfounded or manifestly excessive. Alternatively, we may refuse to comply with the request in such circumstances. 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 us 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