# Melville Housing Association

Policy: Privacy

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| **Subject:** | Privacy Policy |
| **Section:** | Directorate |
| **Objective:** | |
| **Scottish Social Housing Charter** | |
| **Relevant Legislation** | Procedure developed to comply with relevant legislation. |
| **Issue Date:** | Sept 2024 |
| **Review Date:** | Sept 2027 |
| **Policy Ref No:** | DPR 001 |

**Contents**

## 1. Introduction

Melville Housing Association Ltd is committed to ensuring the secure and safe management of data held in relation to customers, staff, and other individuals.

The Association has appointed a Data Protection Officer (see paragraph 8 below) to provide support on all matters relating to this policy. If you have queries on this policy or on any aspect of your role in handling personal data, you should direct your query to the DPO or to our Communications Manager or Chief Executive who will provide guidance or seek support from the DPO where necessary

The Association staff members have a responsibility to ensure compliance with the terms of this policy, and to manage individuals' data in accordance with the procedures outlined.

We recognise that we have a responsibility to conduct our business in as open and accountable manner as possible.

At the same time, we recognise that we have a duty to ensure that personal and other sensitive information is kept confidential, and in particular that we comply with the Data Protection Act 2018 and the UK General Data Protection Regulation as detailed below (the UK GDPR) together with any domestic laws subsequently enacted. Our duty relates to our dealing with:

- Applicants, tenants, factored owners, and other customers;
- Our staff, members, Board Members, and other members of the public;
- All the local and national agencies and authorities which we currently deal with; and
- All commercial contacts.

This policy describes how we will seek to ensure openness and accountability in our activities, while maintaining the confidentiality of personal and sensitive details, including commercially confidential information.

The Association needs to gather and use certain information about individuals. These can include tenants, employees, and other individuals that the Association has a relationship with. The Association manages a significant amount of data, from a variety of sources. This data contains Personal Data and Sensitive Personal Data (known as Special Categories of Personal Data under the UK GDPR).

This Policy sets out the Association's duties in processing that data, and the purpose of this Policy is to set out the procedures for the management of such data.

The Appendices detail the Association's related data protection policies and key documents.

**Appendix 1** outlines key document retention for information relating to legal and regulatory requirements.

## 2. Legislation

It is a legal requirement that the Association processes data correctly; the Association must collect, handle and store personal information in accordance with the relevant legislation.

**The relevant legislation in relation to the processing of data is:**

(a) The Data Protection Act 2018 and UK GDPR; (General Data Protection Regulation);

(b) any other law relating to data protection, the processing of personal data and privacy.

## 3. Data

3.1 The Association holds a variety of data relating to individuals, including customers and employees (also referred to as data subjects) which is known as Personal Data. The Personal Data held and processed is detailed within the Fair Processing Notices at ***Appendix 2*** hereto and the Data Protection Addendum of the Terms and Conditions of Employment which has been provided to all employees.

3.1.1 "Personal Data" is any information that relates to an identified or identifiable living individual. The individual can be identified either by that data alone, or in conjunction with other data held by the Association, such as by a reference number or other identifier.

3.1.2 The Association also holds Personal Data that is sensitive in nature (i.e. relates to or reveals a data subject's racial or ethnic origin, religious beliefs, political opinions, trade union membership, genetics, biometrics (Used for ID purposes), relates to health or sex life of sexual orientation). This is "Special Category Personal Data" or "Sensitive Personal Data".

## 4. Processing of Personal Data

4.1 The Association will comply with the following principles when processing Personal Data:

4.1.1 We will process Personal Data lawfully, fairly and in a transparent manner;

4.1.2 We will collect Personal Data for specified, explicit and legitimate purposes only, and will not process it in a way that is incompatible with those legitimate purposes;

4.1.3 We will only process the Personal Data that is adequate, relevant, and necessary for the relevant purposes;

4.1.4 We will keep accurate and up to date Personal Data, and take reasonable steps to ensure that inaccurate Personal Data are deleted or corrected without delay;

4.1.5 We will keep Personal Data in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the information is processed; and

4.1.6 We will take appropriate technical and organisational measures to ensure that Personal Data are kept secure and protected against unauthorised or unlawful processing, and against accidental loss, destruction, or damage.

4.2 The Association is permitted to process Personal Data on behalf of data subjects provided it is doing so on one of the following lawful bases:

- Processing with the consent of the individual (see clause 4.5 below);
- Processing is necessary for the performance of a contract between the Association and the individual or for entering into a contract with the individual;
- Processing is necessary for the Association's compliance with a legal obligation;
- Processing is necessary to protect the vital interests (i.e. essential to preserve life) of the individual or another person;
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of the Association's official authority; or
- Processing is necessary for the purposes of legitimate interests.

## 4.3 **Fair Processing Notice**

4.3.1 In order to be transparent in how Personal Data is processed, the Association has produced Fair Processing Notices (FPNs) which it is required to provide to all individuals whose Personal Data is held by the Association. The FPNs must be provided to the individual from the outset of processing their Personal Data and they should be advised of the terms of the relevant FPN when it is provided to them.

4.3.2 The Fair Processing Notices at ***Appendix 2*** sets out the Personal Data processed by the Association and the basis for that Processing. These documents are provided to all individuals for whom the Association processes Personal Data at the outset of processing their data.

## 4.4 **Employees**

4.4.1 Employee Personal Data and, where applicable, Special Category Personal Data or Sensitive Personal Data, is held and processed by the Association. Details of the data held, and processing of that data is contained within the Employee Fair Processing Notice which is provided to all job applicants and to Employees at the same time as their Contract of Employment.

## 4.5 **Consent**

Consent as a lawful basis for processing will require to be used from time to time by the Association when processing Personal Data. It should be used where no other alternative lawful basis for processing is available, where it is not being requested as a precondition for accessing services and there is no imbalance of power between the Association and the individual. In the event that the Association requires consent to process a data subject's Personal Data, we shall obtain that consent in writing.

When obtaining consent, this must be freely given and clearly show what processing is being consented to. In any circumstance where there is an imbalance between the Association and the data subject (such as an employee), consent should not be relied upon unless it can be clearly demonstrated that it is entirely voluntary and will not negatively impact the data subject if they refuse to provide their consent.

4.6 **Processing of Special Category Personal Data or Sensitive Personal Data**

In the event that the Association processes Special Category Personal Data or Sensitive Personal Data, the Association must do so in accordance with one of the following special grounds of processing:

- The individual has given explicit consent to the processing of this data for a specified purpose;
- Processing is necessary for carrying out obligations or exercising rights related to employment or social security;
- Processing is necessary to protect the vital interest of the data subject or, if the data subject is incapable of giving consent, the vital interests of another person;
- Processing relates to Personal Data that has manifestly been made public by the data subject;
- Processing is necessary for the establishment, exercise, or defence of legal claims, or whenever court are acting in their judicial capacity; and
- Processing is necessary for reasons of substantial public interest.

A lawful basis as detailed in paragraph 4.2 must also still apply in addition to one of these special grounds.

Where the Association identifies a requirement to process criminal record data as part of any recruitment process, it will ensure that:

- The criminal record data requested is limited only to offences that have a direct bearing on the role applied for;
- It is only obtained following a conditional offer;
- It only retains the criminal record data for as long as is necessary to make a determination on whether to proceed with the offer (but may retain a record that a determination was made); and
- A fair determination will be made in all circumstances, taking account of the relevance, seriousness, circumstances, age of offence and any other relevant factors.

## 5. Data Sharing

5.1 The Association shares its data with various third parties for numerous reasons in order that its day to day activities are carried out. In order that the Association can monitor compliance by these third parties with Data Protection laws, the Association will require the third party organisations to enter into a Data Sharing Agreement.

5.1.1 Personal Data is from time to time shared by the Association and third parties who require to process personal Data that the Association

process as well. Both the Association and the third party will be processing that data in their individual capacities as data controllers.

5.1.2 Where the Association routinely shares in the processing of Personal Data with a third party organisation (e.g. for processing of the employees' pension), it shall require the third party organisation to enter into a Data Sharing Agreement with the Association.

5.1.3 The Association may transfer Personal Data outside the UK and/or to international organisations on the basis that that country, territory or organisation is designated as having an adequate level of protection or that the organisation receiving the information has provided adequate safeguards by way of standard data protection clauses included in a signed Data Protection Addendum.

5.2 **Data Processors**

5.2.1 A data processor is a third party entity that processes Personal Data on behalf of the Association and are frequently engaged if certain of the Association's work is outsourced (e.g. payroll, maintenance, and repair works).

5.2.2 A data processor must comply with Data Protection laws. The Association's data processors must ensure they have appropriate technical security measures in place, maintain records of processing activities and notify the Association if there is a data breach.

5.2.3 If a data processor wishes to sub-contact their processing, prior written consent of the Association must be obtained. Upon a sub-contracting of processing, the data processor will be liable in full for the data protection breaches of their sub-contractors.

5.2.4 Where the Association contracts with a third party to process Personal Data held by the Association, it shall require the third party to enter into a Data Protection Addendum with the Association.

## 6. Data Storage and Security

All Personal Data held by the Association must be stored securely, whether electronically or in paper format.

The Association will use appropriate technical and organisational measures to ensure the security of Personal Data, and to allow availability and access to Personal Data to be maintained or restored following any incident.

6.1 **Paper Storage**

If Personal Data is stored on paper, it will be kept in a secure place where unauthorised personnel cannot access it. When the Personal Data is no longer required it must be disposed of according to our Retention and Disposal policy. If the Personal Data requires to be retained on a physical file, then the Association will ensure it is appropriately secured.

6.2 **Electronic Storage**

Personal Data stored electronically must also be protected from unauthorised use and access. Personal Data should be password protected when being sent internally or externally to the Association's data processors or those with whom the Association has entered into a Data Sharing Agreement. If Personal Data is stored on removable media (CD, DVD, USB memory stick) then that removable media must be stored securely at all times when not being used. Personal Data should not be saved directly to mobile devices and should be stored on designated drivers and servers.

## 7. Breaches

7.1 In the unlikely event of a data breach, the Association has reporting duties. Breaches which pose a risk to the rights and freedoms of the individuals (who are the subject of the breach) will be reported externally in accordance with paragraph 7.3 below.

7.2 A data breach is any event in which there is accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data. All breaches must be reported whether caused by any internal or external event or person.

Examples include:

- Loss or theft of IT equipment or files containing Personal Data
- Unauthorised access by either a member of staff or a third party
- The loss of Personal Data due to equipment failure, malfunction, or destruction
- Human error (including accidental deletion or change)
- Accidental disclosure of Personal Data to scammers or impersonators, or other deception.

7.3 **Internal Reporting**

The Association takes the security of data very seriously and in the unlikely event of a breach will take the following steps:

- As soon as the breach or potential breach has occurred, and in any event no later than six (6) hours after it has occurred, the Data Protection Officer ("DPO", please see paragraph 8 below) must be notified in writing of (i) the breach; (ii) how it occurred; and (iii) what the likely impact of that breach is on any data subject(s);
- The Association must seek to contain the breach by whatever means available;
- The DPO must consider whether the breach is one which requires to be reported to the ICO and data subjects affected and do so in accordance with paragraph 7.3 below;
- Notify third parties in accordance with the terms of any applicable Data Sharing Agreements.
- A log of all data breaches (whether reportable or not under this policy) will be maintained.

### 7.4 Reporting to the ICO and Data Subjects

The DPO will report any breaches which is likely to result in a risk to the rights and freedoms of the individual(s) who has been the subject of the breach to the Information Commissioner's Office ("ICO") within 72 hours of the breach occurring. The DPO must also consider whether it is appropriate to notify the individual(s) affected by the breach where the breach is likely to result in a high risk to those affected.

## 8. Data Protection Officer ("DPO")

8.1. A Data Protection Officer is an individual who has an over-arching responsibility and oversight over compliance by the Association with Data Protection laws. The Association's DPO is Thorntons Law, email DPO@Melville.org.uk.

8.2 The DPO will be responsible for:

8.2.1 Monitoring the Association's compliance with Data Protection laws and this Policy;

8.2.2 Co-operating with and serving as the Association's contact for discussions with the ICO; and

8.2.3 Reporting breaches or suspected breaches to the ICO and data subjects in accordance with paragraph 7 above.

## 9. Data Subject Rights

9.1 Certain rights are provided to data subjects under the UK GDPR.

9.2 **Right of Access** (**Subject Access Requests)**

Individuals are permitted to access a copy of their Personal Data held by the Association upon making a request to do so (a Subject Access Request). Upon receipt of a request by a data subject, the Association must respond to the Subject Access Request within one month of the date of receipt of the request.

The Association:

9.2.1 Must provide the data subject with an electronic or hard copy of the Personal Data requested, unless any exemption to the provision of that data applies in law;

9.2.2 Where the Personal Data comprises data relating to other data subjects, must take reasonable steps to obtain consent from those data subjects to the disclosure of that Personal Data to the data subject who has made the Subject Access Request; or

9.2.3 Where the Association does not hold the Personal Data sought by the data subject, must confirm that it does not hold any Personal Data sought to the data subject as soon as possible, and in any event, not later than one month from the date on which the request was made.9.3.4 Staff must follow the Association's Subject Access Request Procedure whenever responding to a Subject Access Request.

9.3 **The Right of erasure (to be forgotten)**

9.3.1 An individual can exercise their right to "be forgotten" by submitting a request to the Association seeking that the Association delete all the individual's Personal Data. However, this right is not absolute, and the right applies when:

- That Personal Data is no longer necessary
- Where applicable, the individual withdraws their consent
- The individual objects to the processing and the Association have no grounds to refuse that objection
- The Personal Data has been unlawfully processed
- The Association is legally obliged to delete the Personal Data

9.3.2 Each request received by the Association will be considered on its own merits and legal advice will require to be obtained in relation to such

requests. The DPO will have responsibility for accepting or refusing an individual's request in accordance with this paragraph 9.4 and will respond in writing to the request.

9.4 **The Right to Restrict or Object to Processing**

9.4.1 An individual may request that the Association restrict its processing of Personal Data, or object to the processing of that data. This is likely to apply where there is any dispute over the accuracy or lawfulness of the processing.

9.4.2 In the event that any direct marketing is undertaken from time to time by the Association, an individual has an absolute right to object to this marketing and if the Association receives a written request to cease direct marketing, then it will do so immediately.

9.4.3 Each request received by the Association will require to be considered on its own merits and legal advice will require to be obtained in relation to such requests.

9.5 **Right to be informed**

Subjects have a right to the information provided in Fair Processing Notices (see paragraph 4.3 above) which covers how their data is processed. This includes Personal Data collected directly from the subjects or from another source.

9.6 **Right to Rectification**

Where Personal Data is found to be inaccurate or incorrect, the Association must comply with any request to rectify that Data.

9.7 **Right to Data Portability**

Where the lawful basis for processing is consent or contract and the processing is by automated means (i.e. electronic and not hardcopy files), the subject may instruct the Association to transfer the Personal Data it processes to another data controller in a format that is structured, commonly used and machine-readable for use by the other controller. Specifically, this right does not apply to any data processed in the public interest or as part of a legal obligation.

## 10. Data Protection Privacy Impact Assessments ("DPIAs")

10.1 These are a means of assisting the Association in identifying and reducing the risks that our operations have on personal privacy of data subjects.

10.2 The Association shall:

- Carry out a DPIA with the support of the DPO before undertaking a project or processing activity which poses a "high risk" to an individual's privacy. High risk can include, but is not limited to, activities using information relating to health or race, any automated decision-making or profiling, or the implementation of a new IT system for storing and accessing Personal Data; and

- In carrying out a DPIA, it will include at least:

  - a description of the processing activity, its purpose, and the legitimate interest it pursues;
  - an assessment of the need and proportionality of the processing;
  - a summary and assessment of the risks identified; and
  - the measures that we will take to reduce those risks, and details of any security measures that require to be taken to protect the Personal Data

10.3 The Association is required to consult the ICO in the event that a DPIA identifies a high level of risk which cannot be reduced. The DPO will be responsible for such reporting, and where a high level of risk is identified by those carrying out the DPIA they require to notify the DPO within five (5) working days.

## 11. Records of processing

The Association will keep a written record of processing activities which will include:

- The name and contact details of the Association and the DPO;
- The purposes of processing;
- A description of data subjects and categories of Personal Data;
- Categories of recipients Personal Data is shared with;
- Where possible, the technical and organisational security measures that apply

## 12. Archiving, Retention and Destruction of Data

12.1 The Association cannot store and retain Personal Data indefinitely. It must ensure that Personal Data is only retained for the period necessary. The Association shall ensure that all Personal Data is archived and destroyed in accordance with the periods specified in the table below.

12.2 **Retention of Data**

The Association reviews our data retention periods regularly and will only hold your Personal Data for as long as is necessary for the relevant activity, or as required by law (the Association may be legally required to hold some types of information), or as set out in any relevant contract we have with a data subject.

The Association will generally keep data for the following minimum periods set out in the table below which highlights certain key retention periods, after which this will be destroyed if it is no longer required for the reasons it was obtained. A complete schedule for other types of data may be found in the Association's Document Retention Policy (See appendix 1 for summary).

| Type of record | Retention Time |
|---|---|
| Membership records | 5 years after last contact |
| Personal files including training records and notes of disciplinary and grievance hearings | 5 years to cover the time limit for bringing any civil legal action, including national minimum wage claims and contractual claims |
| Redundancy details, calculations of payments, refunds, notification to the Secretary of State | 6 years from the date of the redundancy |
| Application forms, interview notes | Minimum 6 months to a year from date of interviews. Successful applicant's documents should be transferred to personal file. |
| Documents proving the right to work in the UK | 6 years after employment ceases. |
| Facts relating to redundancies | 6 years if less than 20 redundancies. 12 years if 20 or more redundancies. |
| Payroll | 3 years after the end of the tax year they relate to |
| Income tax, NI returns, correspondence with tax office | At least 3 years after the end of the tax year they relate to |
| Retirement benefits schemes – notifiable events, e.g. relating to incapacity. | 6 years from end of the scheme year in which the event took place |
| Type of record | Retention Time |
| Pensioners records | 12 years after the benefit ceases |
| Statutory maternity/paternity and adoption pay records, calculations, certificates (MAT 1Bs) or other medical evidence | 3 years after the end of the tax year to which they relate |

| Type of record | Retention Time |
|---|---|
| Parental Leave | 18 years |
| Statutory Sick Pay records, calculations, certificates, self-certificates | 3 years |
| Wages/salary records, expenses, bonuses | 6 years |
| Records relating to working time | 2 years from the date they were made |
| Accident books and records and reports of accidents | 3 years after the date of the last entry |
| Health and Safety assessments and records of consultations with safety representatives and committee | Permanently |
| Health records | During employment and 3 years thereafter if reason for termination of employment is connected to health |
| Board Members Documents | 5 years after cessation of membership |
| Documents relation to successful tenders | 5 years after end of contract |
| Documents relating to unsuccessful form of tender | 5 years after notification |
| Applicants for accommodation | 5 years |
| Housing Benefits Notifications | Duration of Tenancy |
| Tenancy files | Duration of Tenancy |
| Former tenants' files (key info) | 5 years |
| Third Party documents re care plans | Duration of Tenancy |
| Records re offenders. Ex-offenders (sex offender register) | Duration of Tenancy |
| Lease documents | 5 years after lease termination |
| ASB case files | 5 years/end of legal action |
| Board meetings/residents' meetings | Board Meetings Indefinitely<br>Residents Meetings 3 Years |
| Minute of factoring meetings | Duration of appointment |

## 13. Training

13.1 All staff will receive the necessary training in the operation of Data Protection and the UK GDPR as it relates to their specific duties, and in the maintenance of the confidentiality and security of the manual and computer information that we hold.

13.2 The main training will be carried out as part of the induction process for all new staff. Refresher training will be given at regular intervals as required, as part of our staff training and development programme.

## 14. Compliance with this policy

14.1 Failure to comply with the responsibilities of the Association set out in this policy can have very serious consequences. Given the nature of the Association's operations, this can include:

- Putting individuals' Personal Data at risk
- Civil and criminal sanctions against both the Association and the individuals involved
- Massive reputational damage and to put future operations in jeopardy

Due to the importance of this policy, any failure to comply with its requirements may lead to disciplinary action and ultimately result in dismissal or termination of contract.

## 15. Implementation and Review

15.1 The Chief Executive is responsible for ensuring that this policy is implemented as required by the Board.

15.2 The Chief Executive will ensure that this policy is reviewed by the Board at least every three years.

## 16. Equality Act

16.1 We will ensure that by implementing this policy, we will continue to comply with equalities legislation.

## Additional References

Related References

- Code of Conduct for Governing Body Members (GOV 003)
- Code of Conduct for Staff (GOV 019)
- Subject Access Request Procedure (CORP 120)
- Document Retention Policy (DPR 002)
- Model Data Sharing Agreement

Fair Processing Notices

- Customers
- Employees

**Appendix 1**

Model Documentation Retention

| Document | Statutory Retention Period | Statutory Retention Source | Recommended Retention Period | Comments |
|---|---|---|---|---|
| **1. Governance Documents** | | | | |
| Governance Documentation | N/A | N/A | Permanently | Required for Charitable Status |
| Association Riles (current) | N/A | N/A | Permanently | Required for Charitable Status |
| Association Rules (Previous versions) | N/A | N/A | Permanently | Best Practice |
| Confirmation letter of charitable registration | N/A | N/A | Permanently | Best Practice |
| HMRC Confirmation of Charitable Status | N/A | N/A | Permanently | Best Practice |
| Registration Documentation (I & P Societies) | Permanently | IPSA | Permanently | Best Practice |
| Confirmation of Registration with the Scottish Housing Regulator | N/A | N/A | Permanently | Best Practice |
| **2. Meetings (inc AGMs)** | | | | |
| Notices of Meetings | N/A | N/A | 6 years | In case of challenge to validity of meeting or resolutions |
| Board and Committee Minutes | Permanently | CA | Permanently | Signed originals must be kept |
| Board resolutions | Permanently | CA | Permanently | Signed originals must be kept |

| Document | Statutory Retention Period | Statutory Retention Source | Recommended Retention Period | Comments |
|---|---|---|---|---|
| **3. Registrations and Statutory Returns** | | | | |
| Annual Returns to the Scottish Housing Regulator, OSCR | N/A | N/A | 5 years | Best Practice |
| Annual Returns to the SHR – working papers – ARC, EESSH, 5-year Financial Projections, Loan Portfolio Returns | N/A | N/A | 3 years | Available for inspection by SHR |
| Audited company returns and financial statements (Including I & P Societies' Annual Returns to Financial Conduct Authority) | N/A | N/A | Permanently | Best practice. |
| Declarations of Interest | N/A | N/A | 6 years | Limitation for legal proceedings |
| Register of Directors and Secretaries | Permanently | CA | Permanently | |
| Register of Shareholding Members | Permanently | CA | Permanently | Records may be removed from register 20 years after membership ceases |
| Register of Seals | N/A | N/A | Permanently | Best practice. |
| Register of Share Certificates | N/A | N/A | Permanently | Best practice. |
| List of members (I & P Societies) | N/A | N/A | Permanently | Required by Registrar of Friendly Societies |
| **4. Strategic Management** | | | | |
| Business plans & supporting documentation | N/A | N/A | 5 years after plan completion | Best practice |

| Document | Statutory Retention Period | Statutory Retention Source | Recommended Retention Period | Comments |
|---|---|---|---|---|
| (e.g. organisation structures, aims, objectives, funding issues) | | | | |
| **5. Insurances** | | | | |
| Current and Former Policies | N/A | N/A | Permanently | Limitation can commence from knowledge of potential claim and not necessarily the cause of the claim. |
| Annual Insurance Schedule | N/A | N/A | 6 years | Best Practice |
| Claims and related correspondence | N/A | N/A | 2 years after settlement | Zurich Municipal recommendation. NCVO recommends 3 years after settlement |
| Indemnities and guarantees | N/A | N/A | 6 years after expiry | Limitations for legal proceedings. 12 years if related to land |
| Group Health Policies | N/A | N/A | 12 years after cessation of benefit | Best Practice |
| Employer's Liability Insurance Certificate | N/A | N/A | 40 years | 2008 regs removed requirement to retain for 40 years but need to be mindful of 'long tail' industrial disease claims etc. |
| **6. Finance, Accounting & Tax Records** | | | | |
| Accounting records for Limited company | 3 years from the date made | CA Sec 388 | 6 years | TMA Sec.20. may require any documents relating to tax over 6 (plus) years. |
| Accounting records for I&P | N/A | N/A | 6 years | Required by FCA and Charity Commissioner |
| Balance sheets and supporting documents | N/A | N/A | 6 to 10 years | Best Practice. To relate to accounting records |
| Loan account control reports | N/A | N/A | 6 years | Best practice |
| Social Housing Grant Documentation | N/A | N/A | Permanently | Best Practice |
| Signed Copy of Report and Accounts | N/A | N/A | Permanently | Best Practice |

| Document | Statutory Retention Period | Statutory Retention Source | Recommended Retention Period | Comments |
|---|---|---|---|---|
| Budgets and internal financial reports | N/A | N/A | 2 years | Best Practice |
| Tax returns and records | N/A | N/A | 10 years | TMA Sec.20 may require any documents relating to tax over 6 (plus years) |
| VAT records | 6 years | VATA | 6 years | Custom & Excise requirement for VAT registered bodies |
| Orders and Delivery notes | 6 years | VATA | 6 years | Custom & Excise requirement for VAT registered bodies |
| Copy Invoices | 6 years | VATA | 6 years | Custom & Excise requirement for VAT registered bodies |
| Credit and Debit Notes | 6 years | VATA | 6 years | Custom & Excise requirement for VAT registered bodies |
| Cash Records and Till Rolls | 6 years | VATA | 6 years | Custom & Excise requirement for VAT registered bodies |
| Journal Transfer Documents | 6 years | VATA | 6 years | Custom & Excise requirement for VAT registered bodies |
| Creditors, debtors & cash income control accounts | 6 years | VATA | 6 years | Custom & Excise requirement for VAT registered bodies |
| VAT related correspondence | 6 years | VATA | 6 years | Custom & Excise requirement for VAT registered bodies |
| **7. Other Banking Records (including Giro)** | | | | |
| Cheques | N/A | N/A | 6 year | Limitation for legal proceedings |
| Paying in counterfoils | N/A | N/A | 6 year | Limitation for legal proceedings |
| Bank statements and reconciliations | 3 years from the end of the financial year the transactions were made | CA | 6 year | Limitation for legal proceedings |

| Document | Statutory Retention Period | Statutory Retention Source | Recommended Retention Period | Comments |
|---|---|---|---|---|
| Instructions to bank | N/A | N/A | 6 year | Limitation for legal proceedings |
| **8. Contracts and Agreements** | | | | |
| Contracts under seal and/or executed as deeds | N/A | N/A | 12 years after completion (including any defects liability period) | Limitation for legal proceedings |
| Contracts for the supply of goods or services, including professional services | N/A | N/A | 6 years after completion (including any defects liability period) | Limitation for legal proceedings (12 years of related to land) |
| Documentation relating to small one-off purchases of goods and services, where there is no continuing maintenance or similar requirement | N/A | N/A | 3 years | Best practice. Suggested limit: goods or services costing up to £10,000 |
| Loan agreements | N/A | N/A | 12 years after last payment | Best Practice |
| Licensing agreements | N/A | N/A | 6 years after expiry | Limitation for legal proceedings |
| Rental and hire purchase agreements | N/A | N/A | 6 years after expiry | Limitation for legal proceedings |
| Indemnities and guarantees | N/A | N/A | 6 years after expiry | Limitation for legal proceedings |
| Documents relating to successful tender | N/A | N/A | 6 years after end of contract | Best Practice |

| Document | Statutory Retention Period | Statutory Retention Source | Recommended Retention Period | Comments |
|---|---|---|---|---|
| Documents relating to unsuccessful tender | N/A | N/A | 2 years after notification | Best Practice |
| Forms of tender | N/A | N/A | 6 years | Best Practice |
| **9. Charitable Donations** | | | | |
| Deeds of Covenant | 6 years after last payment | TMA | 12 years after last payment | Limitation for legal proceedings if related to land |
| Index of donations granted | N/A | N/A | 6 years | Best Practice |
| Account documentation | 3 years | CA | 6 years | Best Practice |
| **10. Property Records** | | | | |
| Leases and deeds of ownership | N/A | N/A | While owned Deeds of title – permanently or until property disposed of. Leases – Fifteen years after expiry [from NCVO] | Best Practice |
| Copy of former leases | N/A | N/A | 12 years after settlement of all issues | Limitation for legal action relating to land or contracts under seal |
| Wayleave, licences and easements | N/A | N/A | 12 years after rights given or received cease | Limitation for legal action relating to land or contracts under seal |
| Abstracts of title | N/A | N/A | 12 years after interest ceases | Limitation for legal action relating to land or contracts under seal |
| Planning and building control permissions | N/A | N/A | 12 years after interest ceases | Limitation for legal action relating to land or contracts under seal |
| Searches | N/A | N/A | 12 years after interest ceases | Limitation for legal action relating to land or contracts under seal |

| Document | Statutory Retention Period | Statutory Retention Source | Recommended Retention Period | Comments |
|---|---|---|---|---|
| Property maintenance records | N/A | N/A | 6 years | Limitation for legal action |
| Reports and professional opinions | N/A | N/A | 6 years | Limitation for legal action |
| Development Documentation | N/A | N/A | 12 years after settlement of all issues | Limitation for legal action relating to land or contracts under seal |
| Invoices | 6 years | VATA | 12 years | Limitation for legal action relating to land or contracts under seal |
| VAT documentation | See Finance, Accounting & Tax Records Section | See Finance, Accounting & Tax Records Section | See Finance, Accounting & Tax Records Section | See Finance, Accounting & Tax Records Section |
| Insurances | See Insurances Section | See Insurances Section | See Insurances Section | See Insurances Section |
| **11. Vehicles** | | | | |
| Mileage Records | N/A | N/A | 2 years after disposal | Best practice |
| Maintenance records, MOT tests | N/A | N/A | 2 years after disposal | Best practice |
| Copy Registrations | N/A | N/A | 2 years after disposal | Best practice |
| **12. Capital Assets** | N/A | N/A | Date of purchase to at least 6 years after date sold, transferred or disposed of | Best practice |
| Fixed Asset Register | CA Charities Act | N/A | Permanently | |

| Document | Statutory Retention Period | Statutory Retention Source | Recommended Retention Period | Comments |
|---|---|---|---|---|
| **13. Employees: Pension Schemes** | | | | |
| Actuarial valuation reports | N/A | N/A | Permanently | Institute of Personnel and Development (IPD) recommendation. |
| Detailed returns of pension fund contributions | N/A | N/A | Permanently | Best practice |
| Annual reconciliations of fund contributions | N/A | N/A | Permanently | Best practice |
| Money purchase details | N/A | N/A | 6 years after transfer or value taken | Institute of Personnel and Development (IPD) recommendation. |
| Investment policies | N/A | N/A | 12 years from end of benefits payable under policy | Institute of Personnel and Development (IPD) recommendation. |
| **14. Employees (Personnel Procedures):** | | | | |
| Terms and conditions of service, both general terms and conditions applicable to all staff, and specific terms and conditions applying to individuals | N/A | N/A | 6 years last date of currency | Limitation for legal proceedings |
| **15. Employees: Health and Safety** | | | | |
| Medical records relating to control of asbestos | 40 years | CAWR | 40 years | |
| Health and Safety assessments | N/A | N/A | Permanently | IPD recommendation |
| Health and Safety policy statements | N/A | N/A | Permanently | Good practice |

| Document | Statutory Retention Period | Statutory Retention Source | Recommended Retention Period | Comments |
|---|---|---|---|---|
| Records of consultations with safety representatives | N/A | N/A | Permanently | IPD recommendation |
| Records of consultations with safety representatives | N/A | N/A | Permanently | IPD recommendation |
| Accident books | N/A | N/A | 6 years after last date of last entry | Limitation for legal proceedings |
| Health and Safety Statutory notices | N/A | N/A | 6 years after compliance | Limitation for legal proceedings |
| **16. Technical and Research** | | | | NCVO recommends 12 - 15 years after requirements have ended for both Records & reports and drawings & other data |

**Additional statutory retention sources**

**CA -** Companies Act 2006
**Ch A -** Childrens Act 1989 & 2004
**CBB –** Co-operative & Communities Benefit Societies Act 2014
**LA /Limitations for legal proceedings** – Limitations Act 1980
**RIDDOR -** Reporting of Injuries, Diseases & Dangerous Occurrences Regulations 2013
**RBS(IP)R -** Retirement Benefits Schemes (Information Powers) Regulations 1995
**RRA -** Race Relations Act 1976
**SMPR -** Statutory Maternity Pay Regulations 1982
**TMA -** Taxes Management Act 1970
**VATA -** Value Added Tax Act 1994
**CAWR -** Control of Asbestos Regulations 2012
**DPA -** Data Protection Act 2018
**IT(E)R -** Income Tax Act 2007
**EQA –** Equality Act 2010
**SSPR -** Statutory Sick Pay Regulations

**Appendix 2**

**Fair Processing Notices**

**Melville Housing Association Ltd**

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**Fair Processing Notice**
(How we use employee information)

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## What this Notice Covers

This notice explains what information we collect, when we collect it and how we use this. During the course of our activities we will process personal data (which may be held on paper, electronically, or otherwise) about you and we recognise the need to treat it in an appropriate and lawful manner. The purpose of this notice is to make you aware of how we will handle your information.

Melville Housing Association Ltd ("we" or "us") is committed to a policy of protecting the rights of individuals with respect to the processing of their personal data and adhere to guidelines published in the Data Protection Act 2018, together with any domestic laws subsequently enacted. We collect and use personal data for a variety of reasons.

This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time.

## Identity of Data Controller

We are notified as a Data Controller with the Office of the Information Commissioner under registration number Z7001952 and we are the data controller of any personal data that you provide to us.

Our Data Protection Officer is Thorntons Law. Any questions relating to this notice and our privacy practices should be sent to. DPO@Melville.org.uk

It is important that you read this notice, together with any other fair processing notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

## Categories of personal data we process

We will collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, personal email addresses; date of birth; gender; marital status and dependants;
- Next of kin and emergency contact information;
- National Insurance number;
- Bank account details, payroll records and tax status information;
- Salary, annual leave, pension and benefits information;
- Start date;
- Copy of driving licence;
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process);
- Employment records (including terms and conditions of employment, work history, working hours, training records and professional memberships);
- Compensation history;
- Performance information including appraisals and performance improvement plans;
- Details of any disciplinary and grievance proceedings you have been involved in;
- Details of any leave you have taken including holidays; sickness; family and parental leave;
- CCTV footage;
- Information obtained through electronic means such as swipecard records and biometric means of identification;
- Information about your use of our information and communications systems;
- Photographs;
- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions;
- Trade union membership;
- Information about your health, including any medical condition, health and sickness records and details of any disability for which we may need to make reasonable adjustments;
- Information about criminal convictions and offences.

## Sources of personal data

We collect personal information about you through the application and recruitment process, either directly from you or from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers and credit reference agencies.

We also collect additional personal information in the course of job-related activities throughout the period you are working for us.

## Our lawful basis for processing your data

We will use your personal information in the following circumstances:

- Where we need to perform the contract we have entered into with you;
- Where we need to comply with a legal obligation;
- Where it is necessary for our legitimate interests or those of a third party and your interests and fundamental rights do not override those interests;
- To carry out our obligations and exercise our rights under employment law;
- For health or social care purposes, such as assessing your working capacity;
- To identify and keep under review equality of opportunity or treatment;
- To prevent or detect any unlawful acts and/or prevent fraud.

## Our purposes for processing your data

- Making a decision about your recruitment or appointment;
- Determining the terms on which you work for us;
- Checking you are legally entitled to work in the UK;
- Paying you and, if you are an employee, deducting tax and National Insurance contributions;
- Liaising with your pension provider;
- Administering the contract we have entered into with you;
- Business management and planning, including accounting and auditing;
- Conducting performance reviews, managing performance and determining performance requirements;
- Making decisions about salary reviews and compensation;
- Assessing qualifications for a particular job or task, including decisions about promotions;
- Gathering evidence for possible grievance or disciplinary hearings;
- Making decisions about your continued employment or engagement;
- Making arrangements for the termination of our working relationship;
- Education, training and development requirements;
- Dealing with possible legal disputes involving you, or other employees, workers and contractors, including accidents at work;
- Ascertaining your fitness to work;
- Managing sickness absence;
- Complying with health and safety obligations;
- To prevent fraud;
- To monitor your use of our information and communication systems to ensure compliance with our IT policies;
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software

distribution;
- To conduct data analytics studies to review and better understand employee retention and attrition rates;
- Equal opportunities monitoring;
- Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

## Who has access to your data

We may share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

Recipients of your data may include third-party service providers (such as payroll and pensions providers); other related business entities; a regulator or to otherwise comply with the law.

Where we do so, we will require third parties to respect the security of your data and to treat it in accordance with the law.

Your information will only be stored within the UK and EEA.

When you give us information we take steps to make sure that your personal information is kept secure and safe:

- Paper documentation is held securely with access only to approved members of staff;
- Electronic records are retained in secure locations with access restricted to approved members of staff. Access is controlled by individual password;
- In line with best practice, our IT security systems are protected by a multi-layered approach that begins with an industry leading firewall and ends with anti-virus software;
- Access to our electronic information is provided on a need to know basis;
- We only keep the minimum amount of information that we need, for as long as we need it;
- Out internal IT systems are checked every month to keep them healthy and up-to-date;
- Our electronic information is backed up to a secure Data Centre on a regular basis;
- Any potential threat to the security of our information will generate an alert that will be investigated by qualified personnel;
- Association staff receive regular training and guidance on data security;
- System security is reviewed regularly by our internal auditors.

We review our data retention periods regularly and will only hold your personal data for as long as is necessary for the relevant activity, or as required by law (we may be legally required to hold some types of information), or as set out in any relevant contract we have with you. Data will be held in line with our Data Retention Policy.

As a data subject, your have a number of rights. You can:

- Ask for a copy of the information about you held by us in our records
- Require us to change incorrect or incomplete data;
- Require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- Object to the processing of your data where the organisation is relying on its legitimate interests as the legal ground for processing
- Obtain your data for your own use in specific circumstances.

If you would like to exercise any of these rights please contact the Data Protection Officer.

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

The accuracy of your information is important to us – please help us keep our records updated by informing us of any changes to your personal and contact details.

**How long we will keep your information**

We review our data retention periods regularly and will only hold your personal data for as long as is necessary for the relevant activity, or as required by law (we may be legally required to hold some types of information), or as set out in any relevant contract we have with you.

We will generally keep your information for the following minimum periods set out in the table below, after which this will be destroyed if it is no longer required for the reasons it was obtained.

| Type of record | Retention Time |
|---|---|
| Membership records | 5 years after last contact |
| Personal files including training records and notes of disciplinary and grievance hearings | 5 years to cover the time limit for bringing any civil legal action, including national minimum wage claims and contractual claims |
| Redundancy details, calculations of payments, refunds, notification to the Secretary of State | 6 years from the date of the redundancy |
| Application forms, interview notes | Minimum 6 months to a year from date of interviews. Successful applicant's documents should be transferred to personal file |
| Documents proving the right to work in the UK | 6 years after employment ceases. |
| Facts relating to redundancies | 6 years if less than 20 redundancies. 12 years if 20 or more redundancies. |

| | |
|---|---|
| Payroll | 3 years after the end of the tax year they relate to |
| Income tax, NI returns, correspondence with tax office | At least 3 years after the end of the tax year they relate to |
| Retirement benefits schemes – notifiable events, e.g. relating to incapacity | 6 years from end of the scheme year in which the event took place |
| Pensioners records | 12 years after the benefit ceases |
| Statutory maternity/paternity and adoption pay records, calculations, certificates (MAT 1Bs) or other medical evidence | 3 years after the end of the tax year to which they relate |
| Parental Leave | 18 years |
| Statutory Sick Pay records, calculations, certificates, self-certificates | 3 years |
| Wages/salary records, expenses, bonuses | 6 years |
| Records relating to working time | 2 years from the date they were made |
| Accident books and records and reports of accidents | 3 years after the date of the last entry |
| Health and Safety assessments and records of consultations with safety representatives and committee | Permanently |
| Health records | During employment and 3 years thereafter if reason for termination of employment is connected to health |
| Board Members Documents | 5 years after cessation of membership |
| Documents relation to successful tenders | 5 years after end of contract |
| Documents relating to unsuccessful form of tender | 5 years after notification |
| Applicants for accommodation | 5 years |
| Housing Benefits Notifications | Duration of Tenancy |
| Tenancy files | Duration of Tenancy |
| Former tenants' files (key info) | 5 years |
| Third Party documents re care plans | Duration of Tenancy |
| Records re offenders. Ex-offenders (sex offender register) | Duration of Tenancy |
| Lease documents | 5 years after lease termination |

| | |
|---|---|
| ASB case files | 5 years/end of legal action |
| Board meetings/residents' meetings | 1 year |
| Minute of factoring meetings | Duration of appointment |

**What if you do not provide personal data?**

If you do not provide personal data, it is likely to be impossible for Melville Housing Association Ltd to enter into, or to continue with, an employment relationship with you.

**Changes to this Privacy Notice**

Melville Housing Association Ltd reserves the right to update this fair processing notice at any time, and we will provide you with a new fair processing notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.

**Agreement**

I,

……

acknowledge that on ……..(date)

I received a copy of Melville Housing Association Ltd's Fair Processing Notice for Employees which I have read and understood.

Signature …….

**Melville Housing Association Ltd**

**GDPR Fair Processing Notice**
**(How we use your personal information)**

This notice explains what information we collect, when we collect it and how we use this. During the course of our activities we will process personal data (which may be held on paper, electronically, or otherwise) about you and we recognise the need to treat it in an appropriate and lawful manner.

## Who are we?

Melville Housing Association Ltd is a Scottish Charity (Scottish Charity Number SC032755), a registered society under the Co-operative and Community Benefit Societies Act 2014 with Registered Number 2466R(S) and having our Registered Office at The Corn Exchange, 200 High Street, Dalkeith, Midlothian, EH22 1AZ ("**we**" or "**us**") take the issue of security and data protection very seriously and strictly adhere to guidelines published in the Data Protection Act of 2018, together with any domestic laws subsequently enacted.

We are notified as a Data Controller with the Office of the Information Commissioner under registration number Z7001952 and we are the data controller of any personal data that you provide to us.

Our Data Protection Officer is Thorntons Law LLP, email DPO@melville.org.uk.

Any questions relating to this notice and our privacy practices should be sent to DPO@melville.org.uk.

## How we collect information from you and what information we collect

We collect information about you:

- when you apply for housing with us, become a tenant, request services/repairs, enter into a factoring agreement with ourselves howsoever arising or otherwise provide us with your personal details;
- when you apply to become a Member, Board Member or Tenant Representative;

- from your use of our online services, whether to report any tenancy/ factor related issues, make a complaint or otherwise;
- from your arrangements to make payment to us (such as bank details, payment card numbers, employment details, benefit entitlement and any other income and expenditure related information).

We will collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, address, telephone numbers, personal email addresses; date of birth; gender; marital status and dependants;
- Details of household members, including names, dates of birth and gender;
- Next of kin and emergency contact information;
- National Insurance number;
- Information about your race or ethnicity;
- Information about your health and/or any disabilities;
- References from previous landlords
- Information about criminal convictions and offences;
- Employment Details;
- Housing Benefit Number;
- Bank Details;
- Tenancy and Rent Account reference numbers;

We receive the following information from third parties:

- Benefits information, including awards of Housing Benefit/Universal Credit;
- Payments made by you to us;
- Complaints or other communications regarding behaviour or other alleged breaches of the terms of your contract with us, including information obtained from Police Scotland;
- Reports as to the conduct or condition of your tenancy, including references from previous tenancies, and complaints of anti-social behaviour

**Why we need this information about you and how it will be used**

We need your information and will use your information:

- to undertake and perform our obligations and duties to you in accordance with the terms of our contract with you;
- to enable us to supply you with the services and information which you have requested;

- to enable us to respond to your repair request, housing application and complaints made;
- to analyse the information we collect so that we can administer, support and improve and develop our business and the services we offer;
- to contact you in order to send you details of any changes to our or services which may affect you;
- for all other purposes consistent with the proper performance of our operations and business;
- to contact you for your views on our products and services;
- To communicate with Members, Board Members and Tenant Representatives;
- to comply with our obligations with Regulators and Statutory Bodies

**Sharing of Your Information**

The information you provide to us will be treated by us as confidential and will be processed only by our employees within the UK/EEA.

We may disclose your information to other third parties who act for us for the purposes set out in this notice or for purposes approved by you, including the following:

- 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;
- If we instruct repair or maintenance works, your information may be disclosed to any contractor;
- If we are investigating a complaint, information may be disclosed to Police Scotland, Local Authority departments, Scottish Fire & Rescue Service and others involved in any complaint, whether investigating the complaint or otherwise;
- If we are updating tenancy details, your information may be disclosed to third parties (such as utility companies and Local Authority);
- If we are investigating payments made or otherwise, your information may be disclosed to payment processors, Local Authority and the Department of Work & Pensions;
- If we are conducting a survey of our products and/or service, your information may be disclosed to third parties assisting in the compilation and analysis of the survey results. Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent;
- If we are pursuing debts, your information may be disclosed to Tracing Agencies, Legal Advisors and Debt Collection Agencies.

## Transfers outside the UK and Europe

Your information will only be stored within the UK and EEA.

## Security

When you give us information we take steps to make sure that your personal information is kept secure and safe.

- Paper documentation is held securely with access only to approved members of staff;
- Electronic records are retained in secure locations with access restricted to approved members of staff. Access is controlled by individual password;
- In line with best practice, our IT security systems are protected by a multi-layered approach that begins with an industry leading firewall and ends with anti-virus software;
- Access to our electronic information is provided on a need to know basis;
- We only keep the minimum amount of information that we need, for as long as we need it;
- Our internal IT systems are checked every month to keep them healthy and up-to-date;
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- Association staff receive regular training and guidance on data security;
- System security is reviewed regularly by our internal auditors.

## How long we will keep your information

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| Application forms, interview notes | Minimum 6 months to a year from date of interviews. Successful applicant's documents should be transferred to personal file. |
| Documents proving the right to work in the UK | 6 years after employment ceases. |
| Facts relating to redundancies | 6 years if less than 20 redundancies. 12 years if 20 or more redundancies. |
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| Retirement benefits schemes – notifiable events, e.g. relating to incapacity | 6 years from end of the scheme year in which the event took place |
| Pensioners records | 12 years after the benefit ceases |
| Statutory maternity/paternity and adoption pay records, calculations, certificates (MAT 1Bs) or other medical evidence | 3 years after the end of the tax year to which they relate |
| Parental Leave | 18 years |
| Statutory Sick Pay records, calculations, certificates, self-certificates | 3 years |
| Wages/salary records, expenses, bonuses | 6 years |
| Records relating to working time | 2 years from the date they were made |
| Accident books and records and reports of accidents | 3 years after the date of the last entry |
| Health and Safety assessments and records of consultations with safety representatives and committee | Permanently |
| Health records | During employment and 3 years thereafter if reason for |

| Type of record | Retention Time |
|---|---|
| | termination of employment is connected to health |
| Board Members Documents | 5 years after cessation of membership |
| Documents relation to successful tenders | 5 years after end of contract |
| Documents relating to unsuccessful form of tender | 5 years after notification |
| Applicants for accommodation | 5 years |
| Housing Benefits Notifications | Duration of Tenancy |
| Tenancy files | Duration of Tenancy |
| Former tenants' files (key info) | 5 years |
| Third Party documents re care plans | Duration of Tenancy |
| Records re offenders. Ex-offenders (sex offender register) | Duration of Tenancy |
| Lease documents | 5 years after lease termination |
| ASB case files | 5 years/end of legal action |
| Board meetings/residents' meetings | 1 year |
| Minute of factoring meetings | Duration of appointment |

**Your Rights**

You have the right at any time to:

- ask for a copy of the information about you held by us in our records;
- require us to correct any inaccuracies in your information;
- make a request to us to delete what personal data of your we hold;
- object to receiving any marketing communications from us.

If you would like to exercise any of your rights above please contact us at DPO@Melville.org.uk.

You also have the right to complain to the Information Commissioner's Office in relation to our use of your information. The Information Commissioner's contact details are noted below:

The Information Commissioner's Office – Scotland
Queen Elizabeth House
Sibbald Walk
Edinburgh
EH8 8FT

Telephone: 0303 123 1115

Email: Scotland@ico.org.uk

The accuracy of your information is important to us - please help us keep our records updated by informing us of any changes to your email address and other contact details.