



## **PRIVACY POLICY STATEMENT**

Cill Dara Housing Association (CDHA) (also referred to as "we", "us" or "our" in this privacy notice) is the data controller and as such is responsible for your personal data.

CDHA is committed to respecting and protecting your privacy. We will always take great care to fulfil our responsibilities under the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. At CDHA we collect personal information about you and are committed to protecting this information and your privacy. This includes when accessing CDHA services, signing a tenancy agreement or visiting our website. This statement sets out the basis on which any personal data we collect, use, and store or obtain from or about you will be processed by us.

## **WHO IS COVERED BY THE POLICY**

- Tenants of the Association
- Contractors
- Staff, Board Members and Volunteers
- Private Sector Leasing Owners
- Others we may do business with

## **INTRODUCTION**

This notice informs you of our policy regarding information we hold and record about you. It sets out the conditions under which we may process personal information that you provide to us. It covers information that could identify you ("personal information") and information that could not identify you. In the context of the law "process" means to collect, store, transfer, use or otherwise act on information.

We take the protection of your privacy and confidentiality seriously. We understand that all visitors to our website are entitled to trust that their personal information will not be used for any purpose unintended by them and will not accidentally be transferred to a third party.

We undertake to preserve the confidentiality of all information you provide to us, and trust that you reciprocate.

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by contacting us.

Our policy complies with EU law including the requirements of General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

## WHO ARE WE?

When we talk about Cill Dara Housing Association, or "us" or "we" in this statement, we are talking about Cill Dara Housing Association CLG of Unit 16A, Kildare Business Park, Melitta Road, Kildare Town, County Kildare, R51 N765 and we are the data controller for the purposes of the General Data Protection Regulation and Data Protection Act 2018.

Cill Dara Housing Association is a registered charity whose principal activities are associated with the provision of social housing across County Kildare.

## WHAT INFORMATION DO WE COLLECT ABOUT YOU?

The information we hold on our records concerns our relationship with you. For example, we could hold the following types of data about you:

**Identity and contact data:** Includes first name, last name, title, date of birth, gender, PPSN and identity documents (e.g., driver's license, passport, PSC), phones numbers, email addresses and next of kin details.

**Behaviour data:** Includes a record of your compliance with your tenancy with us.

**Financial data:** Includes the amount of money you have paid us, any amounts outstanding and associated recovery action as well as household income details in order to carry out rent calculations and reviews.

**Profile data:** Includes who lives in our houses, your username and password (Resident Portal App), feedback and survey responses.

**Transaction data:** Includes details about payments made from and to you.

**Other data:** Includes CCTV images, Coronavirus related health information.

We may collect Special Categories of Personal Data about you (e.g., health/medical information). Generally, the information we hold will have been provided by you.

We will only ask for personal information that is appropriate to enable us to deliver our services. If you do not provide this information, we may not be in a position to process your request.

We may occasionally receive unsolicited correspondence from members of the public which contains personal data relating to third parties ("Third Party Data"). We may process this data for the purposes of replying to correspondence, dealing with queries or complaints, and complying with our legal and regulatory obligations. The

legal basis on which we process Third Party Data is that this is necessary for our legitimate interests in conducting our business and ensuring proper management and functioning of Cill Dara Housing Association.

## HOW WE USE YOUR INFORMATION?

The personal data that you provide to use will enable us to fulfil our obligations to you and provide you with the appropriate services and support that you may require. Cill Dara Housing Association must have a legal basis to process your personal data. Usually this falls within our contractual obligations to fulfil your tenancy agreement, however it could be through your consent or may be necessary for the legitimate interests of Cill Dara Housing Association.

To enable Cill Dara Housing Association to provide you with the best service possible, we may use your personal data: **for market research purposes and to get your views and feedback to help us improve the services you receive.**

We may contact you about our services and products and ask you if you would like to get involved in the activities or groups which we hold e.g., Tenant Focus Group (TFG).

## OUR LEGAL BASIS FOR PROCESSING YOUR INFORMATION

**Contract:** the processing is necessary for a contract we have entered into with you, or because you have asked us to take specific steps before entering into a contract. Failure to provide such personal data would mean that we are unable to provide our service to you.

**Consent:** You have given clear consent for us to process your personal data for a specific purpose. Where consent is the lawful basis for processing, you have the right to withdraw your consent at any time.

**Legal obligation:** The processing is necessary for us to comply with the law.

**Legitimate interests:** The processing is necessary for our legitimate interests, or the legitimate interests of a third party, unless there is as good reason to protect your personal data and rights and freedoms which would override those legitimate interests.

**Vital interests:** The processing is necessary to protect someone's life.

## WHO WE SHARE YOUR INFORMATION WITH?

On occasion it will be necessary to share your personal data with third parties. For example, Cill Dara Housing Association uses a number of contractors to maintain and service our properties. We will only share relevant and necessary information with them.

Where personal data is shared, we ensure appropriate technical and organisational safeguards are used to protect your personal data.

## HOW WE KEEP YOUR INFORMATION SAFE?

We are committed to holding your personal information securely. Our security measures comply with the law and international standards, access is given only to those that need it and our computers, files and buildings are secure. Any information you submit during the course of an online interaction through our website is stored securely in compliance with the law and international standards.

## HOW LONG WE KEEP YOUR INFORMATION FOR?

We will not hold your personal information for longer than is necessary. We retain your personal information for as long as we need it for the purposes described in this statement, or to comply with our obligations under applicable law and, if relevant, to deal with any claim or dispute that might arise between you and us.

## YOUR RIGHTS

You have a range of rights under data protection law in relation to the way we process your personal information, including:

- right to request access to a copy of your personal data.
- right to have personal data rectified if it is inaccurate or incomplete.
- right to erasure ('right to be forgotten') in certain scenarios.
- right to restriction of processing, in certain scenarios.
- right to data portability, only applies to data you have provided to us.
- right to object to processing, including automated decision making.

Cill Dara Housing Association does not make decisions about you automatically or carry out profiling.

## PRIVACY POLICIES OF OTHER ORGANISATIONS OR WEBSITES

Our website may contain links to other websites run by other organisations. This privacy statement applies only to the personal information we hold, so if you click on a link to another website or engagement with any other organisation, you should read their privacy policy.

## CHANGES TO OUR PRIVACY STATEMENT

Cill Dara Housing Association keeps its privacy statement under regular review. This privacy statement was last updated in **June 2022**.

## HOW TO CONTACT US

If you have any questions about this privacy statement, the data we hold on you, or you would like to exercise your data protection rights, please contact us. You may contact our Data Protection Officer on [info@cilldarahousing.ie](mailto:info@cilldarahousing.ie) or in writing to Data Protection Officer, Cill Dara Housing Association, Unit 16A Kildare Business Park, Melitta Road, Kildare Town, Co Kildare, R51 N765