

Board Members Fair Processing Privacy Notice (How we use your information)

MONITORING FORM	
Department	Corporate Services
Department Director	CEO
This policy is applicable to	All
Author / Owner	Human Resources Director
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Date of next review	25 May 2020
Internal /external consultees (if required.	n/a

1. WHAT IS AN FAIR PROCESSING PRIVACY NOTICE?

The purpose of this notice is to explain 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. Data is stored in a range of different places, including in your Board file, in the company's HR management and Payroll systems and in other IT systems including the organisation's email system

Weslo Housing Management and Weslo Property Management are 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 of 1998] and the General Data Protection Regulation (EU) 2016/679 which is applicable from the 25th May 2018, together with any domestic laws subsequently enacted. We collect and use personal data for a variety of reasons.

Both Companies are registered as Data Controllers with the Office of the Information Commissioner under registration numbers Z4942312 and ZA029223 respectively and are the data controllers of any personal data that you provide to us.

2. WHAT INFORMATION DO WE COLLECT?

We collect information in a variety of ways. For example, data is collected through application forms and/or CVs; obtained from your passport or other identity documents such as your driving licence; from forms completed by you at the start of or during Board Membership; from correspondence with you; or through interviews, meetings or other assessments.

In some cases, we collect personal data about you from third parties, such as references supplied by former companies and information from Disclosure Scotland checks permitted by law:

- Name
- Date of Birth
- Address
- Telephone Number
- E-mail address
- NI number
- Equal opportunities monitoring information, including information about your ethnic origin, gender, sexual orientation, health and religion or belief
- Applications and/or CV's including details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with the organisation
- Information about your nationality and entitlement to work in the UK
- Information about your criminal record
- References
- Emergency contacts
- Details of your Board attendance at meetings, training, conferences and other events organised by the company

- Assessments of your performance as a Board member, including appraisals, training you have participated in
- Bank Details
- Driving licence details
- Board members interests declarations
- Photographs

3. WHY DOES THE COMPANY PROCESS PERSONAL DATA?

We need to process data to enter into a contract with you to become a Board Member for the Company. For example, we need to process your data to pay you expenses and pay for training in your role as a Weslo Board member.

In some cases, we need to process data to ensure that we are complying with our legal obligations. For example, entitlement to work in the UK, and to comply with health and safety laws for certain positions, it is necessary to carry out criminal records checks [Disclosure Scotland Checks] to ensure that individuals are permitted to undertake the role in question.

In other cases, the company has a legitimate interest in processing personal data before, during and after the end of the Board Member relationship. Processing your data allows us to:

- Run recruitment processes
- Maintain accurate and up-to-date records and contact details (including details of who to contact in the event of an emergency)
- Provide references on request
- Respond to and defend against legal claims
- Maintain and promote equality in the company

Where the company processes other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is done for the purposes of equal opportunities monitoring. Data that the company uses for these purposes is anonymised or is collected express consent, which can be withdrawn at any time. Board Members are entirely free to decide whether or not to provide such data and there are no consequences of failing to do so.

4. WHO HAS ACCESS TO DATA?

Your information will be shared internally, with members of the HR, Corporate Services and Payroll departments, and IT staff if access to the data is necessary for performance of their roles.

The company shares your data with third parties in order to obtain pre-employment references from other employers, obtain necessary criminal records checks from Disclosure Scotland.

Your information will be stored within the UK and EEA, however should the occasion arise that your information is transferred outside the UK or EEA we ensure that there are adequate safeguards in place to protect your information in accordance with this notice, including the following:

- Decisions by the Information Commissioners Office that the third country has adequate safeguards in place.

Data review forms are issued annually to ensure data is current however change of information forms are available online to update information out with the yearly review.

5. HOW DOES THE COMPANY PROTECT DATA?

The company takes the security of your data seriously. We have internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.

Where the company engages third parties to process personal data on its behalf, they will do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

Our Privacy Statement can be viewed at: www.weslo-housing.org

6. HOW LONG DOES THE COMPANY KEEP DATA?

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 retention guidelines on the information we hold is provided in our Privacy Statement on our website.

7. YOUR RIGHTS

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

- Ask for a copy of the information about you held by us in our records and require us to correct any inaccuracies or incomplete information;
- Require the company 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 company is relying on its legitimate interests as the legal ground for processing; and
- Ask the company to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the organisation's legitimate grounds for processing data.

If you would like to exercise any of these rights please contact the Corporate Services Department.

You have the right to complain to the Information Commissioner's Office in relation to our use of your information.

The Information Commissioner's Office – Scotland
45 Melville Street, Edinburgh, EH3 7HL
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 personal and contact details.

8. WHAT IF YOU DO NOT PROVIDE PERSONAL DATA?

Certain information, such as contact details, your right to work in the UK and payment details, have to be provided to enable the company to appoint you as a Board Member. If you do not provide other information, this will hinder the company's ability to efficiently administer any entitlements as part of your Board membership.