



## **Almond Housing Association Ltd and Almond Enterprises Ltd**

### **Board Privacy Notice**

#### **How we use your personal information**

Almond Housing Association controls and processes a range of personal information about you. In this privacy notice 'personal information' means your personal data i.e. information about you from which you can be identified. Your personal information does not include data where your identity has been removed (anonymous data). It is important that the personal information that we hold and process about you is accurate and up to date. Please keep us informed if your personal information changes during your engagement with us.

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

The purpose of this Privacy Notice is to explain to you the reasons why we may hold and process your personal data and explain your rights under the current data protection laws. This privacy notice explains how we collect and use personal information about our Board Members and Board Member applicants.

#### **Who we are**

We are Almond Housing Association Ltd, registered with the Scottish Housing Regulator No HAL 285, a registered Scottish Charity No SC031696, registered Scottish Property Factor No PF000181, a registered society under the Co-operative and Community Benefit Societies Act 2014 with Registered Number 2471R(S) and having their Registered Office at 44 Etive Walk, Craigshill, Livingston EH54 5AB. We are registered with the Information Commissioner, registration number Z4868537, and are the data controller of personal data that you provide to us.

Our subsidiary, Almond Enterprises Ltd, is registered in terms of the Companies Acts with registered number SC281724, and having their Registered Office at 44 Etive Walk, Craigshill, Livingston EH54 5AB. Almond Enterprises Ltd is also registered with the Information Commissioner, registration number Z3475588, and is the data controller of personal data that you provide to it.

We take the issue of security and data protection very seriously and strictly adhere to the Data Protection Act of 2018 (the 2018 Act) and the UK General Data Protection Regulation (UK GDPR), the Data (Use and Access) Act 2025 together with any domestic laws subsequently enacted.

We have appointed a Data Protection Officer, this role is carried out by our Governance and Business Improvement Manager.

If you have any queries about this notice, how we use your personal information, or if you require a copy of this notice in an alternative format (such as large print, Braille or audio recording), you can write to us at our registered office address above, or on the following details:

Email: [enquiries@almondha.org.uk](mailto:enquiries@almondha.org.uk) Phone: 01506 439291

### **What information we collect**

We collect the following information from you, both from information you have supplied through membership of the Association forms or any other instance where you have provided us with your personal information. We may collect the following:

- Name, address, telephone number, e-mail address, and any other contact information.
- date of birth.
- Protected characteristics data, as defined by the Equality Act 2010.
- Any relevant health and safety information (including disability information).
- Qualifications, references, employment history, and professional memberships.
- Register of interests including interests of close connections.
- Eligibility criteria for Board
- Standard disclosure checks
- Photographs
- Relationship with current board members and / or staff
- Positions with public responsibilities
- Legal & financial declarations
- Membership and directorships held, together with duration
- Training records
- Video and audio for communications
- Images captured by CCTV at our office

### **Why we collect your data**

We collect and use the above information and personal data for:

<ul style="list-style-type: none"><li>- Administration duties</li><li>- Payment of any out-of-pocket expenses</li><li>- Recruitment and selection</li><li>- Appraisal, training and development</li><li>- Bank money laundering requirements and identity checks (some banks may run 'soft' credit checks)</li></ul>	<ul style="list-style-type: none"><li>- Health, safety and wellbeing</li><li>- Equality monitoring</li><li>- Regulatory reporting</li><li>- Membership of professional bodies</li><li>- Businesses we work with may carry out identity checks</li><li>- Legal requirements</li></ul>
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### **How we collect information**

We collect information including personal data about you when:

- You apply for Membership
- You join our Board through our recruitment and induction process.
- You provide us personal data, for any business reason.
- Our lawful basis for collecting data may be based on consent, legitimate interest, public task, legal obligation, vital interest.
- When we are handling information that is sensitive, known as special category data, we may use additional lawful basis such as explicit consent, vital interest or legitimate interest.
- When you take part in surveys
- CCTV imagery

### **Sharing of your information**

We may disclose your personal data to any of our employees, contractors, insurers, professional advisors, banks, agents, partners, auditors, suppliers as reasonably necessary, and in accordance with data protection legislation.

We may also disclose your personal data:

- with your consent.
- to the extent that we are required to do so by law
- to comply with any regulatory requirements
- in connection with any ongoing or prospective legal proceedings.
- If we are investigating a complaint, information may be disclosed to solicitors, independent investigators such as auditors, the Scottish Housing Regulator and other regulatory body involved in any complaint, whether investigating the complaint or otherwise.
- to protect the rights, property and safety of our employees and other Board / Committee members, our tenants, users of our website and other persons
- in connection with any ongoing or prospective proceedings
- to another organisation we do business with (such as AllPay)
- to another organisation if we enter into a joint venture or merge with another organisations.
- to banks for money laundering checks and/or identify checks
- to other organisations who may undertake a credit check which is in the legitimate interest of the organisation
- to the purchaser (or prospective purchaser) of any business or asset that we are, or are contemplating, selling;
- to another organisation if we enter into a joint venture or merge with another organisation.
- AEL Board members registered with Companies House may have finance checks carried out under Legal Obligation in line with Government instruction

### **What are the lawful bases for us processing your personal data**

We will only process your personal data on one or more of the following legal bases:

- consent
- vital interests
- legal obligation
- our legitimate interests
- public task in the public interest / official authority
- contract - where applicable
- Our legitimate interests (including CCTV recordings, telephone call recordings, maintenance of disaster recovery plans, recording next of kin details, etc)

- Where there is a redefined legitimate interest, as defined under the Data (Use and Access) Act 2025 and by the relevant Secretary of State.
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### **Special categories of personal data**

Special categories of personal data means information about your racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; health; sex life or sexual orientation; criminal convictions, offences or alleged offences; genetic data; or biometric data for the purposes of uniquely identifying you.

The "special categories" of sensitive personal information referred to above require higher levels of protection. We need to meet additional legal requirements for collecting, storing and using this type of personal information.

Our legal basis for processing your special category data is:

- (a) Explicit consent
- (b) Employment, social security and social protection (if authorised by law)
- (c) Vital interests
- (d) Not-for-profit bodies
- (e) Made public by the data subject
- (f) Legal claims or judicial acts
- (g) Reasons of substantial public interest (with a basis in law)
- (h) Health or social care (with a basis in law)
- (i) Public health (with a basis in law)
- (j) Archiving, research, and statistics (with a basis in law)

### **Transfers outside the UK**

Your information will only be processed within the UK, except where international transfers are authorised by law.

### **Security**

When we process your personal data we take steps to make sure that your personal information is kept secure and safe. This includes ensuring there is adequate IT and physical security for all locations that data is stored and we ensure that these measures are tested on a regular basis to ensure compliance.

We take the following measures to ensure any personal information you give us is kept secure:

- We work in secure offices with restricted access.
- We use password protected IT systems and software with restricted access.
- We make regular backups of files.
- We protect ourselves against viruses and malware.
- We have secure onsite and offsite storage systems for paper files.
- We have a secure website.

Our [Data Protection Policy](#) is available on our website.

## **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 / best practice, or as set out in any relevant contract we have with you and in accordance with our Data Retention Policy and Schedule.

## **Your rights**

You have the right at any time to request us to exercise your data subjects' rights in relation to the following:

- the right to be informed
- the right to access
- the right to rectification
- the right to object to processing
- rights in relation to automated decision making and profiling
- the right to be forgotten
- the right to data portability
- the rights to restrict processing

When you make a request, we are required to verify your identity and may ask you for specific information to fulfil this purpose. Normally, you will not need to pay a fee when you make any of the above requests, but we may charge a reasonable fee or refuse to comply if your request for access is clearly unfounded or excessive.

If you would like to exercise any of your rights above please contact us at [enquiries@almondha.org.uk](mailto:enquiries@almondha.org.uk) or 01506 439291 in the first instance. You should note that your rights under the UK GDPR and 2018 Act are not absolute and are subject to qualification.

It is important that the personal information that we collect, hold and use about you is accurate and current. Please keep us informed of any changes by contacting our Data Protection Officer at: [enquiries@almondha.org.uk](mailto:enquiries@almondha.org.uk) or 01506 439291.

## **Queries and concerns**

If you have any concerns about our use of your personal information, you can make a complaint to us at:

Data Protection Officer  
Almond Housing Association  
44 Etive Walk  
Craighill  
Livingston  
EH54 5AB  
[enquiries@almondha.org.uk](mailto:enquiries@almondha.org.uk)  
01506 439291

If you still remain unsatisfied after your complaint has been processed by us, you also have the right to complain to the Information Commission in relation to our use of your information. The Information Commission's contact details are noted below:

[Information Commission](#)  
Telephone: 0303 123 1113  
Online: [Make a complaint | ICO](#)