



Almond Housing Association Ltd and Almond Enterprises Ltd Employee 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 your '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 notice explains what personal information we collect, when we collect it, how we process 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 Employee Privacy Notice is to explain to you the reasons why we may hold and use your personal data and explain your rights under the current data protection laws.

We may collect and process personal data relating to you to manage our contract/agreement, including pre-contract/agreement negotiations, with you. We are committed to being transparent about how we collect and use your data, and to meeting our data protection obligations with you.

This notice does not form part of your contract of employment or agreement with us. It applies to all our employees, workers, volunteers, apprenticeships, and consultants (including applicants), regardless of length of service, and may be amended at any time. If any amendments are required in the future, we will notify you as is appropriate.

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, Craighill, 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 Phone: 01506 439291

What information we collect

We collect the following information from you through a variety of resources (i) directly from you; or (ii) third parties (including employment agencies, Government agencies and previous employers).

- Name, address, telephone number, e-mail address, and any other contact information.
- National Insurance number.
- Next of kin and emergency contact details.
- Date of birth.
- Protected characteristics data, as defined by the Equality Act 2010.
- Qualifications, references, employment history, and professional memberships.
- Absence and medical information.
- Pension, personal tax, and bank account information.
- Driving licence and car insurance (if applicable).
- Business travel details.
- Your declared interests and those of your close connections.
- Your eligibility of right to work in the UK.
- Information about any criminal convictions if relevant for your job.
- Details of your work pattern (days of work and working hours) and attendance at work
- Details of periods of leave taken by you, including holiday, sickness absence, family leave and sabbaticals
- Details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence
- Assessments of your performance, including appraisals, performance reviews and ratings, performance improvement plans and related correspondence

- Information about medical or health conditions, including if you have a disability for which the organisation needs to make reasonable adjustments
- Equalities data monitoring information including protected characteristics
- Complaint details as a result of any lodged complaints from our tenants/owners
- CCTV imagery.
- Call recordings.
- Your opinions through employee surveys.
- Location data via our lone working devices

Why we collect your data

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

- Administration in relation to your employment
- Payment of salaries
- Recruitment and selection
- Pensions and associated benefits
- Membership of professional bodies
- For complying with laws and regulations, such as health and safety legislation
- To administer employee benefits
- To check your eligibility of right to work in the UK
- Absence management
- Training and development purposes

How we collect information

The Association may collect information in several ways which include:

- Apply for a job with us via application forms, references, and other relevant pre-employment checks (e.g. Disclosure Scotland checks and any health related information relevant to your role).
- Enter into a contract of employment with us (through relevant employment policies, such as managing attendance, performance management, etc.)
- Provide us personal data, for any business reason.
- We may also receive relevant information from a third party which may impact your engagement with us, as an employee or potential employee.
- Your identification documents you have given us
- Background checks conditional for your engagement with us (if relevant)
- PVG/Disclosure/DVLA checks relating to criminal convictions/offences
- Former employers or other individuals whom you have given us permission to contact to provide us with a reference
- Medical professionals provide us with appropriate health information in order that we can manage any health- related situations that may have an impact on your ability to work with us.
- Membership with professional bodies that confirm membership
- Qualifications/training bodies that provide us information relating to you
- HMRC
- Government agencies and other public authorities
- Staff may be captured by CCTV systems, and we may use CCTV footage for security and disciplinary purposes
- Staff surveys
- During your employment, there may be reason to monitor use of email, internet, IT systems, and company devices to ensure these are not being used for improper or inappropriate purposes.

- We may monitor use of company devices to ensure these are not excessively being used for personal purposes
- You use our lone working safety devices for visits outside of the office

Sharing of your information

We may disclose your personal data to any of our employees, officers, contractors, insurers, professional advisors, agents, suppliers or subcontractors, government agencies and regulators and healthcare providers so far as reasonably necessary, and in accordance with data protection legislation.

We may disclose to and share information about you with third parties for the purposes set out in this notice, or for purposes approved by you, including the following:

- To manage your employment or potential employment with us;
- To process your monthly salary payments;
- To allow your pension provider to process pensions information and handle your pension; and
- If we enter into a joint venture with or is sold to or merged with another business entity, your information may be disclosed to our new business partners or owners.
- with your consent;
- to the extent that we are required to do so by law;
- to comply with any regulatory requirements
- to protect the rights, property and safety of us, our tenants, users of our websites and other persons;
- 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;

What are the lawful bases for us processing your personal data

Under the UK General Data Protection Regulation, the lawful bases which we rely on for processing this information are:

- We have your consent
- We have a contractual obligation, including pre-contractual negotiations
- We have a legal obligation
- We have a vital interest
- We have a legitimate interest
- Where we are undertaking a public task
- Our legitimate interests (including early stages of the recruitment selection process, 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.

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 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 bases 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)

Our Processing of Special Category Personal Data:

We may use your special category personal information, including but not limited to the following ways:

- We will use information relating to leave of absence, which may include sickness absence or family related leave, to comply with employment and other laws.
- We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.
- We will use trade union membership information to pay trade union premiums, register the status of a protected employee and to comply with employment law obligations.

If relevant for your job role, we will process criminal convictions data provided by Disclosure Scotland.

Transfers outside the UK

Your information will only be processed within the UK, except where international transfers are authorised by law. Our cloud-based telephony system, Dialpad, may process your information outside of the UK, however we are assured that adequate safeguards are in place to protect your personal data, as set out in a contract and data processor agreement.

Security

Your information will only be stored within the UK, other than where international transfers of personal data may legally take place, in accordance with Chapter V of the UK General Data Protection Regulation.

When you give us information, we take steps to make sure that your personal information is kept secure and safe. This includes ensuring there is appropriate 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.

We 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.

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 and in accordance with our Data Retention Policy and Schedule.

If you do not wish to provide your personal data

You have obligations under your employment contract or other agreement with us (including any potential contracts of employment/other agreements) to provide us with requested personal data. This may include name, qualifications and experience, contact details, your right to work in the UK and payment details. If you do not provide the requested information, this may mean that we cannot enter into a contract/agreement with you. You may also have to provide us with personal information in order to exercise your statutory rights, such as in relation to statutory leave entitlements

Your rights

You have various rights in respect of the personal data we hold about you – these are set out in more detail below. Please note that not all rights are absolute and will depend on the lawful basis of processing your data.

- 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 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 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
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](#)