**Client Privacy Statement**

This notice explains what personal data (information) Trust in Fife holds about you and how said information is collected, used and shared whilst we are working with you and for a period thereafter. It also explains your rights under the law relating to your personal data. We are required to notify you of this information under data protection legislation (General Data Protection Regulations – GDPR).

Please ensure that you read this Statement (sometimes referred to as a 'Privacy Notice') and any other similar statement we may provide to you from time to time when we collect or process personal information about you.

**Who collects and uses the information?**

Trust in Fife (the company) is a 'data controller' and gathers and uses certain information about you. Where the company is also a 'data processor', we will process information received from third parties about you.

Trust in Fife is a Company Limited by Guarantee, registered in Scotland under company number 146791 and is a Registered Scottish Charity No. SCO21786.

Registered, and main trading, address: Craig House, Ellon Road, Kirkcaldy KY2 6FB.

Regulated by Social Care and Social Work Improvement Scotland (Care Inspectorate).

**What is personal data/information?**

Personal data is defined under data protection laws in the UK and Europe as 'any information relating to an identifiable person who can be directly or indirectly identified' and is, in effect, any information about you that enables you to be identified. This would include obvious information such as your name and contact details, but could include less obvious information such as identification numbers, electronic location data, and other online identifiers. The personal data that Trust in Fife collects, processes and stores is set out in this statement.

**Data protection principles**

Trust in Fife will comply with the data protection principles when gathering and using personal information, as set out in the company Data Protection Policy (available on request).

**About the information collected and held**

The table set out on the following pages summarises the information the company collects and holds, how and why this is done, how the information is used and with whom it may be shared.

The company may also need to share some of the categories of personal information set out below with other parties, such as Local authority and/or law enforcement agencies, and third party support agencies. The recipient of the information will be bound by confidentiality obligations.

The company seeks to ensure that the information collected and processed is always proportionate - that is, only the information necessary to undertake the Housing Support service is collected and processed and said information is only stored for as long as it is required. Any changes to the information collected, or to the purpose for which it is collected and processed, will be notified to you.

**Where information may be held**

Information may be held at company offices (either electronically or in hard copy) and by third-party agencies, service providers, representatives and agents. Security measures are in place to seek to ensure that there is appropriate security for information held.

**How long is your information kept**

Trust in Fife keep your information for no longer than is necessary; this normally means whilst you are accommodated/working with the service and for a period thereafter the length of which will depend on the nature of the service and support provided to you. Further details are set out in the company Data Retention Policy (available on request).

**Your rights**

Under the GDPR, you have the following rights, which Trust in Fife will always work to uphold:

1) The right to be informed about the personal data the company collect and use about you. This Privacy Statement should tell you everything you need to know, but you can always contact us to find out more or to ask any questions.

2) The right to access the personal data held about you. This is called making a Subject Access Request - please see below for instructions on how to make a request.

3) The right to have your personal data rectified if any of the data held is inaccurate or incomplete. Please contact us using the details at the bottom to find out more.

4) The right to be forgotten, i.e. the right to ask for any personal data held to be deleted or otherwise disposed of. Please contact us using the details at the bottom to find out more.

5) The right to restrict (i.e. prevent) the processing of your personal data.

6) The right to object to us using your personal data for a particular purpose or purposes.

7) The right to data portability. This means that you can ask for a copy of your personal data held by Trust in Fife to re-use with another organisation or business in certain cases.

8) Rights relating to automated decision-making and profiling. Please note Trust in Fife do not use your personal data in this way.

For more information about how Trust in Fife uses your personal data, or to exercise any of your rights as outlined above, please contact us using the details provided below.

Further information about your rights can also be obtained from the Information Commissioner's Office (ICO) at <https://ico.org.uk/> or on **0303 123 1113**  or at your local Citizens Advice Bureau.

If you have any cause for complaint about how Trust in Fife use your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

**Keeping your personal information secure**

Trust in Fife have appropriate security measures in place to prevent personal information from being accidentally lost, used or accessed in an unauthorised way. Access to your personal information is limited to those who have a genuine need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

Procedures are also in place to deal with any suspected data security breach and you will be notified, along with any applicable regulator, of a suspected data security breach where the company is legally required to do so.

**Changes to what we do**

Trust in Fife regularly review and, where necessary, update its privacy information, policies, procedures and privacy statements. If Trust in Fife plan to use your personal information for a new purpose, the documentation and privacy statement will be updated, and the changes communicated to you before starting to use the information in a new way. Where you have given your consent to process your personal data, and the company wishes to change the way in which it is processed, consent will be sought for the new processing.

Sometimes the company has to change what it does because of a change in the law, or because of a change in the legitimate interests of the company; in which case the latest version of this Privacy Statement will always be available from support staff on request.

**How to contact Trust in Fife**

For information about how the company collects, stores and processes your personal data, or for any questions or concerns you might have about data protection please contact Ruth Hogg, Service Administrator on 01592 646677 or at ruth.hogg@trustinfife.co.uk.

**How to complain**

Trust in Fife hope that it can resolve any query or concern you raise about the use of your information. If not, contact the Information Commissioner for further information about your rights and how to make a formal complaint.

**Schedule relating to the information we may collect and hold**

(dependent on nature of accommodation)

|  |  |  |  |
| --- | --- | --- | --- |
| **The information collected** | **How the information is collected** | **Why the information is collected** | **How the information may be shared and used** |
| NameDate of birthAddressPrevious addressesContact numberEmergency contactGenderMarital statusTenancy StatusHousehold membersRace/ethnicity/sexual orientation/religious beliefsHealth/addiction issuesSupport requirementsSelf-evaluation details Warnings/TerminationsPhotographsCriminal convictions \* | Directly from you/ from Fife Council/ from an external support agency | * To enter into an agreement to provide you with our services/ support.
* Legitimate interest: to maintain contact with you in order to support you.
* Protect your vital interests.
* To comply with our legal obligations
 | * To provide you with the necessary support/service which you have sought.
* Information may be shared with third party support agencies.
 |

As well as having a lawful basis for processing, Trust in Fife will not handle any sensitive personal information (special categories), and information relating to unspent criminal convictions, without first obtaining the appropriate explicit consent from you.

You may be required, by law, to provide certain categories of information which has been marked with an asterisk (\*) above. If you do not provide this information, Trust in Fife may not be able to provide you with the accommodation/service(s) you are seeking or may have to stop providing you with the services/support you have been offered.