**PENTLAND HOUSING ASSOCIATION ltd**

**TRANSPARENCY STATEMENT (TEST AND PROTECT)**

We are the controller of the personal information we hold about you. This means we are legally responsible for how we hold and use personal information about you. It also means we are required to comply with data protection laws when holding and using your personal information. This includes providing you with the details contained within this statement of how we hold and use your personal information, who it may be shared with and your rights in relation to your personal information.

We have appointed a Data Protection Officer (DPO), Daradjeet Jagpal, who ensures we comply with data protection laws. If you have any questions about this statement or how we hold or use your personal information, please contact the DPO by: e-mail at pentland-dpo@infolawsolutions.co.uk; telephone on 07397 796 655; or writing to: Data Protection Officer, Pentland Housing Association Ltd, 37-39 Traill Street, Thurso, KW14 8EG.

You can also contact us by: e-mail at pha@pentlandhousing.co.uk; telephone on 01847 892 507; or writing to: Pentland Housing Association Ltd, 37-39 Traill Street, Thurso, KW14 8EG.

1. **What personal information do we hold and use about you?**

When you visit our office, we will collect your name, address, telephone number and e-mail address. We will also record the date and time of your arrival and departure. If you do not provide us with this information, we will refuse you entry to our office.

1. **Why do we hold and use this personal information about you?**

We are collecting, holding and using your personal information to assist with NHS Scotland’s Test and Protect strategy in relation to the coronavirus public health epidemic. Your personal information will not be used for any other purpose.

To assist in the containment of the virus, we will only share your personal information when it is requested directly by NHS Scotland for Test and Protect. This will only be in the unlikely event there is a cluster of coronavirus cases linked to our office around the time of your visit.

Personal information will be transferred securely to NHS Scotland, who will use it to contact trace those who attended our office around the same time as the positive case, and will provide guidance and support to those who may be advised to self-isolate. For further information on NHS Scotland Test and Protect, please see: <https://www.informationgovernance.scot.nhs.uk/use-of-your-data-for-track-trace-isolate-tti/>

1. **What is our legal basis for holding and using your personal information?**

Data protection laws require us to have a legal basis for holding and using your personal information. In this case, our legal basis is legitimate interests because we have a legitimate interest in ensuring the health and safety of our staff and visitors to our office and contributing towards containing the risk of the incidence and spread of coronavirus in Scotland.

1. **How long do we keep your personal information?**

We will hold your personal information for the above purpose securely for at least 21 days from the date on which you visit our office. We will dispose of your personal information in a safe and secure manner thereafter.

1. **What rights do you have in relation to your personal information that we hold and use?**

Under certain circumstances, the law gives you the right to request:

* A copy of your personal information.
* Correction of any incomplete or inaccurate personal information.
* Deletion of your personal information where there is no valid reason for us continuing to hold and use it.
* Suspension of our use of your personal information, for example, if you want us to check that it is correct or verify the reason for us holding and using it or to stop us from using your personal information altogether if we have committed a breach of data protection laws.

Please contact the DPO if you wish to make any of the above requests. When you make a request, we may ask you for specific information to help confirm your identity for security reasons. 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 a copy of your personal information is clearly unfounded or excessive.

1. **Feedback and complaints**

We welcome your feedback on how we hold and use your personal information, and this can be sent to the DPO.

You have the right to make a complaint to the Information Commissioner, the UK regulator for data protection, about how we hold and use your personal information. The ICO’s contact details are as follows:

Telephone: 0303 123 1113 Website: <https://ico.org.uk/concerns/>

If you would like to receive this statement in alternative format, for example, large print, Braille or audio tape, please contact us.

1. **Updates to this statement**

We may update this statement at any time, and will provide you with an updated version when required to do so by law.

Last updated: June 2021