



ICO Registration: Z1138776

## **Privacy Notice:**

### **Freedom of Information & Environmental Information Requests**

River Clyde Homes is committed to maintaining the accuracy, confidentiality and security of your personal information. This privacy notice tells you what to expect us to do with your personal information when you submit a request for information under the Freedom of Information (Scotland) Act 2002 (FOI) or the Environmental Information (Scotland) Regulations 2004 (EIR).

River Clyde Homes is the data controller in respect to information requests it receives.

Our Data Protection Officer can be contacted at [InformationGovernance@riverclydehomes.org.uk](mailto:InformationGovernance@riverclydehomes.org.uk)

#### **The type of personal information we collect**

The personal information we require from you to process your request for information under the Freedom of Information (Scotland) Act 2002 or the Environmental Information (Scotland) Regulations 2004 includes, but may not be limited to:

- **Identity Data:** your full name
- **Address Data:** email or postal address
- **Contact Data:** telephone number and/or correspondence address
- **Communication Needs Data:** details of any reasonable adjustments required in relation to communication methods; language requirements; or communication preferences
- **Authorised Representative Data:** name and correspondence details of anyone authorised to act on your behalf, if applicable
- **Special Category Data:** this information should not be provided unnecessarily. We recognise that some types of special category may be able to be inferred from Communication Needs Data or, for example, some email addresses
- **FOI Records:** copies of our correspondence with you including our responses under the relevant legislation

#### **How we get the personal information**

The personal information we process is provided to us directly by you, or someone authorised to act on your behalf, in order to process your information request and to provide you with a response to your FOI or EIR request.

## How we use your personal information

We will only use your personal data when the law allows us to. Under the UK GDPR, the lawful bases we rely on for processing this information are that it is necessary to perform a specific task in the public interest and to meet our legal obligations.

We have set out below, in table format, a description of all the ways we plan to use your personal data and which of the legal bases we rely on to do so.

Purpose	Type of personal information	Lawful basis
To check the validity of FOI or EIR request.	<ul style="list-style-type: none"> <li>Identity Data</li> <li>Address Data</li> <li>Authorised Representative Data</li> </ul>	To comply with our legal obligations, under: <ul style="list-style-type: none"> <li>the Freedom of Information (Scotland) Act 2002;</li> <li>the Environmental Information Regulations (Scotland) 2004.</li> </ul>
To communicate with you regarding your information request including to provide a response to your request/ request for a review of our response	<ul style="list-style-type: none"> <li>Identity Data</li> <li>Address Data</li> <li>Contact Data</li> <li>Communication Needs Data</li> <li>Authorised Rep. Data</li> <li>Special Category Data</li> </ul>	To comply with our legal obligations, under: <ul style="list-style-type: none"> <li>the Freedom of Information (Scotland) Act 2002;</li> <li>the Environmental Information Regulations (Scotland) 2004.</li> </ul>
<p>To make any reasonable adjustments in relation to how we communicate with you.</p> <p>For example, we may be able to provide literature in large print if you have difficulty reading smaller print; or provide documents in an alternative language if English is not your first language.</p>	<ul style="list-style-type: none"> <li>Identity Data</li> <li>Address Data</li> <li>Contact Data</li> <li>Communication Needs Data</li> <li>Authorised Rep. Data</li> <li>Special Category Data</li> </ul>	To comply with our legal obligations, under: <ul style="list-style-type: none"> <li>the Equality Act 2010;</li> <li>the Freedom of Information (Scotland) Act 2002;</li> <li>the Environmental Information Regulations (Scotland) 2004.</li> </ul>
To manage our information requests and ensure compliance with FOI legislation.	<ul style="list-style-type: none"> <li>Identity Data</li> <li>Address Data</li> <li>Contact Data</li> <li>Communication Needs Data</li> <li>Authorised Rep. Data</li> <li>Special Category Data</li> <li>FOI Records</li> </ul>	To comply with our legal obligations, under: <ul style="list-style-type: none"> <li>the Freedom of Information (Scotland) Act 2002;</li> <li>the Environmental Information Regulations (Scotland) 2004.</li> </ul>
Where you make an appeal to the Scottish Information Commissioner, we are obliged to share (with a copy of your original request and our response, if you request an appeal).	<ul style="list-style-type: none"> <li>Identity Data</li> <li>Address Data</li> <li>Contact Data</li> <li>Communication Needs Data</li> <li>Authorised Rep. Data</li> <li>Special Category Data</li> <li>FOI Records</li> </ul>	To comply with our legal obligations, under: <ul style="list-style-type: none"> <li>the Freedom of Information (Scotland) Act 2002;</li> <li>the Environmental Information Regulations (Scotland) 2004.</li> </ul>

## Who we share your personal information with

Where you make an appeal to the Scottish Information Commissioner, we are legally obliged to share your information with them.

We may transfer information about you to our subsidiary, Home Fix Scotland, for purposes connected to your information request or the management of the company's business.

We are also legally obliged to share certain data with other public bodies, such as HMRC and will do so where the law requires this. We will also generally comply with requests for specific information from other regulatory and law enforcement bodies where this is necessary and appropriate. Your information is also analysed internally to help us improve our services.

## How we manage your personal information

We process your information in accordance with data protection principles. We will keep your personal details for no longer than necessary. We are committed to keeping your personal details up to date and ask that you inform us about any changes to ensure the details we hold for you are accurate.

## How long we keep your information

We will only keep your personal information for as long as necessary to process your information request and to safeguard us in the event of any claims, complaints, litigation, enquiries or investigations following. Unless you ask us not to, we will delete your personal information relating to your information request in accordance with the following timescale:

FOI/EIR Requests	2 years from the latest response date
FOI/EIR Requests for Review	2 years from the latest response date
FOI/EIR Appeal to SIC	5 years from the response date

We have a data retention policy that sets out the periods for retaining and reviewing all information that we hold. You can request a copy by contacting us at [InformationGovernance@riverclydehomes.org.uk](mailto:InformationGovernance@riverclydehomes.org.uk).

## Your data protection rights

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

Please contact us at [Contact@riverclydehomes.org.uk](mailto:Contact@riverclydehomes.org.uk) if you wish to make a request.

You are not required to pay any charge for exercising your rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances. If you make a request, we have one month to respond to you. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated. Any requests received by River Clyde Homes will be considered under the applicable data protection legislation.

## **Our contact details**

There are many ways you can contact us, including by phone, email and post.

Our postal address: River Clyde Homes  
22 Pottery Street  
Greenock  
PA15 2UZ

Phone Number: 0800 013 2196

E-mail: [Contact@riverclydehomes.org.uk](mailto:Contact@riverclydehomes.org.uk)

If you have any concerns about our use of your personal information, you can make a complaint to us. We aim to resolve all queries or concerns internally but you do have the right to complain to the Information Commissioner's Office at any time or to claim compensation, through the courts, if we misuse your information. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

The Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF Telephone: 0303 123 1113  
Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

## **Changes to our privacy notice**

We keep this privacy notice under regular review to make sure it is up to date and accurate. It was last updated in September 2024. The latest full version is always available from our website at [www.riverclydehomes.org.uk](http://www.riverclydehomes.org.uk)