

VSA SERVICE USER PRIVACY NOTICE

Voluntary Services Aberdeen (“VSA”) (a charity registered in Scotland under registration number SC012950) is the controller responsible for the personal data we collect about users of our services. We collect and process your personal data when you and your families / carers engage with us to provide services to you.

Our website privacy policy contains more detailed information about our data processing (including about data security, data retention and lawful processing bases) and you should read that in conjunction with this privacy notice. See [Privacy Policy - VSA](#). Alternatively, if you do not have access to the internet, you can ask us to send you a hard copy by contacting the Data Protection Department using the details below.

The data we collect about you

We may collect, use, store and transfer different kinds of personal data about you as follows:

- **Identity Data:** including titles, full names, copies of identity documents, date of birth, age, gender, pronouns and nationality and family or next of kin relationships;
- **Contact Data:** including telephone number, mobile number, email address and home address for tenants and their next of kin;
- **Service Use:** including information about the type of services provided, including preferences and information collected by members of staff and volunteers, other services accessed (outside VSA), funding and information provided by local authorities or other funding sources;
- **CCTV Data:** some of our properties have CCTV covering their entrances, footage of you may be collected by our CCTV and surveillance systems when you attend our premises;
- **Health Data:** including information about specific support needs, physical or mental health conditions, medication and information provided regarding GP or any other medical professional.
- **Financial and Transaction Data:** including information relating to bank account and payment card details, payment history, income details and information relating to benefits. This is relevant if you are a tenant or a resident with us.
- **Communications Data:** including information generated when sending and responding to correspondence with you.
- **Feedback Data:** including your opinions about the services we provide, and your opinions and beliefs which we may gather as part of our feedback processes to improve our services.

How we use your personal data

We will only use your personal data for the purpose for which we collected it which includes the following:

- **Service Provision:** most of the personal information we hold about you is used to provide you or your family member with a service, which may include the provisions of medical services in an emergency situation;
- **Service Review and Improvements:** we may use your personal information to identify and implement improvements of our services;
- **Internal Operations:** we may use your personal information for our internal operations, such as management, auditing, accounting and governance, and for finance purposes such as collecting rent payments or arrears;
- **Public Relations and Marketing:** we may use information about your use of our services and your feedback as case studies or in materials available to the public;
- **Legal Purposes:** we may need to share your personal information with public authorities where required by law, and we may process your personal information if required in connection with legal claims;
- **Record Keeping:** we may need to retain and use your personal information to maintain records regarding use of our services, or for archiving purposes; and
- **Security:** we may use CCTV Data for security purposes, to monitor the provision of our services, and in connection with the prevention and detection of crime.

Why we use your personal data?

VSA will only use your personal data where:

- **Contract:** We need to collect and use your personal data to enter into a contract with you, such as a tenancy agreement, and to provide you with services and accommodation (for example, we may need your information to assess your eligibility and requirements for housing if you are a tenant or resident);
- **Legal Obligation:** We are legally required to do so, e.g. by a law enforcement agency, to comply with any statutory obligations, to exercise any of our powers under legislation, or if compelled by an order of the Court;
- **Vital Interests:** It may be in your vital interests for us to hold and use certain personal data about you (for example, we may need to know certain health information about you in order to be able to provide you with care in a medical emergency);
- **Legitimate Interests:** We may also use your personal data where we or another organisation have a legitimate interest to do so (for example, we may use CCTV

cameras for the protection and security of our properties, and we may collect Feedback Data to help improve our services);

- **Health or Social Care:** We may process sensitive personal data, such as health information, about you where necessary as part of the provision of any health or social care services we are obligated to provide to you; and
- **Consent:** In rare circumstances, we may seek your consent to process your personal data (for example, if we want to send you information about the VSA's community and fundraising activities).

Who we share your personal data with?

We may share this information with the following third parties when necessary:

- professional advisors, including auditors, lawyers and insurance providers;
- public authorities and law enforcement agencies, including local councils, NHS Scotland, Police Scotland; and
- our third party service providers, such as our IT providers who provide and support the systems used to hold your personal data.

VSA will only pass personal data to third parties if they have signed a contract that requires them to abide by the requirements of data protection laws or where we are compelled to share information by law or a court order.

We may also share your personal data with:

- your family or next of kin; and
- VSA employees (including volunteers and contractors).

International transfers

We do not expect that your personal information will be transferred outside of the UK. In the rare circumstances where we require to transfer your personal data outside the UK to countries which have laws that do not provide the same level of data protection as UK law, we ensure a similar degree of protection is afforded to your information by using specific standard contractual terms approved for use in the UK which give the transferred personal data the same protection that it has in the UK.

Retention

We will hold your personal data while we provide services to you and for a period of up to 6 years after we cease to provide services to you. We take appropriate steps to ensure that, after expiry of your period, your personal data is either securely destroyed or anonymised so that you can no longer be identified from it.

Where your personal data requires to be held for archiving purposes, we may retain your records indefinitely.

Automated Decision-Making

Your personal information will not be used in any automated decision making (a decision made solely by automated means without any human involvement) or profiling (automated processing of personal data to evaluate certain conditions about an individual).

Your legal rights

Data protection laws give you several rights as set out below. If you would like to exercise any of your rights, please contact us using the details located above.

- **Access your personal information:** you may request access to a copy of your personal information. All requests for access to personal information should be made to us in writing.
- **Withdraw consent:** if you have given us consent to use your personal information to send you communications, you can withdraw your consent at any time.
- **Rectification:** you may ask us to rectify and update any inaccurate information we hold about you or to complete any information that is incomplete.
- **Erasure:** you may ask us to delete your personal information.
- **Portability:** you may ask us to provide you with the personal information that we hold about you in a structured, commonly used, machine readable format, or ask for us to send such personal information to another data controller.
- **Restriction:** you can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.
- **Object:** you may object to our processing of your personal information in accordance with this Notice. Please contact us, providing details of your objection.
- **Complaint:** you have the right to make a complaint about how we process your personal data [either directly to us or]to the UK Information Commissioner's Office.

If you decide you do not want to provide us with your personal data, this may prevent us from being able to evaluate any application for housing with us, or may require us to reconsider or cancel any existing tenancy agreements with you.

Contact details

If you have any questions about this privacy notice or our data protection practices please contact our Data Protection Department in writing at VSA, 38 Castle Street, Aberdeen, AB11 5YU or by emailing data.protection@vsa.org.uk