Privacy Policy: Data & Information Security Policy

Last revised: 26th April 2022

This privacy notice tells you what to expect when Bristol SU Lettings ("Bristol SU Lettings", "Lettings", "we", "us") collects or processes personal information. All data is held in accordance with the guidelines set out in the General Data Protection Regulation (GDPR) and the Privacy of Electronic Communication Regulation.

It applies to information we collect about:

- People who use our service, including tenants, prospective tenants, guarantors, landlords.
- Users of our websites
- People who give us feedback, make suggestions, complete questionnaires, polls or make complaints

We use personal data to:

- To provide you with the services, products of information you asked for
- To administer your tenancy or application including reference checks and updating utility providers and local authorities where relevant
- To provide you with information on relevant properties, where you have asked us to by registering with us
- Keep a record of your relationship with us, to enable us to respond to queries and requests efficiently and accurately
- To ensure we know how you prefer to be contacted
- Understand how we can improve our services, products or information

You should read this Privacy Policy before using our website or services to ensure you are aware of how we will use your personal data.

This Policy includes information on:

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What data do we collect?

People who use our service

This includes prospective and current tenants and past tenants from the last 6 years, landlords and guarantors. Your personal data (any information which identifies you, or which can be identified as relating to you personally for example, name, address, phone number, email address) will be collected and used by us. We'll only collect the personal data that we need. Where we process your data we will only do so where there is a legal basis to do so. This includes the following:

- Where there is a contract like where you have asked us to provide a service and we need to process your data to fulfil our obligations. This is the case where you use our services as a tenant, prospective tenant or landlord.
- Where you give us consent like where you have told us you'd like us to send you direct updates on our properties, offers or news by registering with us on our website. We will always include information on how you can unsubscribe in emails sent to out properties mailing list.
- Where law requires it We are obliged by various laws including the Housing Act, Contracts Act and employment law to process certain data. This might refer to information we are required to collect to administer your tenancy or contract with us, or any information we are required to hold if you apply for a job with us.
- Legitimate Interest We carefully balance your rights when we think there is a legitimate interest in us processing data to support you, for example using a third-party processor (such as google analytics) to improve your experience using our website or accessing our services.

You might give us your personal data by filling in forms on our website or in branch, or by registering to use our service. Additionally, there is some information we may collect automatically when you use our website (see 'Users of our Website' for more details).

Where you apply for or arrange a tenancy through Bristol SU Lettings we will ask you to provide the following information in order to enable us to fulfil our contractual obligations to you and minimise risk of fraud:

- Contact details (name, address, email, phone number)
- Identification verification details and documents (ID, student number)
- Financial information (bank details, bank address) and information relevant to credit checks
- Where relevant details relating to a guarantor (name, address, contact details, ID, bank details)
- Employment information (employer, salary, job title, length of employment)

Users of our website

We automatically receive and save certain types of information whenever you interact with this website. We use the information to monitor website traffic and to

assist with the navigation and user experience of the website. By continuing to use this website you indicate that you agree to this.

Information that we will automatically receive includes:

- Requested URL (Uniform Resource Locator)
- IP (Internet Protocol) address (this may or may not identify a specific computer)
- Domain name from which you access the internet
- Referring URL
- Software (browser/operating system) used to access the page
- Date and time pages were visited

To perform this function we sometimes use cookies. You can read more about how we use cookies <u>here</u>.

We may use and analyse the information we collect so that we can manage and improve the services on the website. Demographic and statistical information about user behaviour may be collected and used to analyse the popularity and effectiveness of the website. Any disclosure of this information will be in aggregate form and will not identify individual users.

Bristol SU also uses services from Google on this website to measure and analyse visitor information. For further information on these, please visit Google's website.

Bristol SU will not (nor will it allow any third party to) use the statistical analytics tools to track or to collect personally identifiable information of visitors to this website. Bristol SU will not associate any data gathered with any personally identifying information from any source as part of our use of the statistical analytics tools.

How long do we keep your data for?

We will only hold your personal data as long as is strictly necessary. Generally the following retention policies apply:

- Where you register to receive our property updates: until you unsubscribe/withdraw consent. Information on how to do so is included in each email update.
- Where the data relates to a tenancy application, current or previous tenancy: we will hold the data for 6 years after the tenancy has ended. This is to ensure we are able to comply with existing legislation, and ensures we can provide you with rental references at a later date should you require these.

How we keep your data safe and who has access?

Personal data collected and processed by us will be shared with Bristol SU Lettings employees. Staff will only have permissions to access the information required for them to perform their role. Everyone who handles personal data is mandated to do so in line with UK Law. All staff are required to undertake mandatory training as part of their induction.

In order to administer tenancies and applications we will share your data with the following persons:

- Landlords
- Deposit Protection Service (Under the Housing Act 2004)
- Goodlord who provide our tenancy admin software you can see their privacy policy here <u>https://www.goodlord.co/privacy-policy</u>
- Fixflo Our maintenance ticket system

We only share data with these organisations to ensure we are able to fulfil our contractual obligations, and to minimise risk of fraud.

We may use third party companies as data processors to carry out certain administrative functions on behalf of Bristol SU Lettings. If so, a written agreement will be put in place to ensure that any personal data disclosed is held under adequate security, will only be used for the purposes specified by Bristol SU Lettings and will have appropriate security measures in place. Any data used for these purposes is destroyed in line with our retention policies. This includes using specialist software/databases to keep a record of your agreements and relationship with us.

We do not sell your personal information for other organisations to use.

Alongside these actors there may be some circumstances where we give access to personal data to the following:

- Contractors
- Advisors
- Agents (including external research agencies who may contact you to carry out research on our behalf)
- Service provider partners

When we allow access to your information, we will always have complete control of what they see, what they are allowed to do with it and how long they can see it. We do not sell your personal information for other organisations to use.

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff, agents and contractors.

Some of our suppliers run their operations outside the European Economic Area (EEA). Although they may not be subject to the same data protection laws as companies based in the UK, we will take steps to make sure they provide an adequate level of protection in accordance with UK data protection law. By submitting your personal information to us you agree to this transfer, storing or processing at a location outside the EEA.

We may need to disclose your details if required to the police, regulatory bodies or legal advisors.

We will only ever share your data in other circumstances if we have your explicit and informed consent.

How can you request your data or make changes? Your right to know what data we hold about you, make changes or ask us to stop using your data.

You have a right to ask us to stop processing your personal data, and if it's not necessary for the purpose you provided it to us for (e.g. administering a tenancy, or holding data in compliance with legislation) we will do so. Contact bristolsulettings@bristol.ac.uk if you have any concerns.

You have a right to ask for a copy of the information we hold about you. If there are any discrepancies in the information we provide, please let us know and we will correct them.

If you want to access your information, you must complete the Subject Access Request Form with a description of the information you want to see and the required proof of your identity by post to Bristol SU Lettings, University of Bristol, 5 Tyndall Avenue, Clifton, Bristol, BS8 1UD. We do not accept these requests by email so we can ensure that we only provide personal data to the right person. We will require you to have your ID verified, so that we can confirm your identity. You can do this at our office. We will have 30 days to respond to your request.

If you have any questions please send these to <u>bristolsu-lettings@bristol.ac.uk</u>

Changes to this statement

We may change this Privacy Statement from time to time. If we make any significant changes in the way we treat your personal information we will make this clear on our Website or by contacting you directly.

If you have any questions, comments or suggestions, please let us know by contacting <u>bristolsu-lettings@bristol.ac.uk</u>