Fair Processing Notice

This notice explains what information we collect, when we collect it and how we use this. During the course of our activities, we will process personal data (which may be held on paper, electronically, or otherwise) about you and we recognise the need to treat it in an appropriate and lawful manner. The purpose of this notice is to make you aware of how we will handle your information.

We take the issue of security and data protection very seriously and strictly adhere to guidelines published in the General Data Protection Regulation (EU) 2016/679 which is applicable from the 25th May 2018, together with any domestic laws subsequently enacted.

We are notified as a Data Controller with the Office of the Information Commissioner under registration number A8330227 and we are the data controller of any personal data that you provide to us.

Our Data Protection Officer is Bryan Naftalin, 69 Wigmore St, London W1U 1PZ <u>bn@danobe.co.uk</u> and any questions relating to this notice and our privacy practices should be sent to him.

How we collect information from you and what information we collect

We collect information about you from your application for accommodation and from relevant tenancy and legal documentation relating thereto.

We collect some or all of the following information about you:

• Tenant name, e-mail address, telephone number, date of birth, address (including any previous addresses), National Insurance number, nationality, next of kin, Right to Rent information;

• Guarantor name, e-mail address, telephone number, date of birth, address (including any previous addresses), marital status, National Insurance number, nationality, next of kin (if applicable);

• Property address, term, rent, deposit, utility and service responsibilities;

• The employment status of tenants and/or guarantors, address, contact details (including email, phone and fax numbers) of the employer/accountant, payroll numbers, length of employment, salary information (including any regular overtime or commission), and any other income received;

• Bank account details of the tenant, including account number and sort code, and any hire purchase/loan agreements/credit cards or store cards that you have; and

• Any welfare benefits that you may be eligible for or are currently on.

Why we need this information about you and how it will be used

We need your information and will use your information:

• to undertake and perform our obligations and duties to you in accordance with the terms of our contract with you;

- to enable us to supply you with the services and information which you have requested;
- to help manage your tenancy;

• to carry out due diligence on any prospective tenant, including whether there are any judgements against them, or any history of bankruptcy or insolvency;

• to analyse the information we collect so that we can administer, support and improve and develop our business and the services we offer;

• to contact you in order to send you details of any changes to our supplies which may affect you;

- using CCTV to monitor communal areas (with appropriate signage warning the occupants of CCTV);
- for all other purposes consistent with the proper performance of our operations and business.

Sharing of Your Information

The information you provide to us will be treated by us as confidential. We may disclose your information to other third parties who act for us for the purposes set out in this notice or for purposes approved by you, including the following:

• If we enter into a joint venture with or merged with a business entity, your information may be disclosed to our new business partners or owners;

• Providing contact details to repairers if work needs to be carried out;

• To carry out due diligence on you as a prospective tenant/ guarantor, including but not limited to the carrying out of affordability checks, due diligence checks and the obtaining of references from relevant parties, whose data you have provided;

• If you request so, your information shall be disclosed in order to determine if there are any judgements against you, as the prospective tenant/guarantor, or to determine if they have a history of bankruptcy or insolvency;

• If you fail to make payments under your tenancy, your information may be disclosed to any relevant party assisting in the recovery of this debt or the tracing of you as a tenant; and

• In the creation, renewal or termination of the tenancy, your information will be disclosed to the relevant local authority, tenancy deposit scheme administrator, service/utility provider, freeholder, factor, facilities manager or any other relevant person or organisation in connection with this.

Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.

Transfers outside the UK

Your information will only be stored by us within the UK. We may use banking, accounting and backup software online / in the cloud, using reputable companies only, such as the Royal Bank of Scotland, Xero and Microsoft. Should their servers be located outwith the UK, your data may be transferred outside the UK to that extent. We consider that these companies have are adequate safeguards in place to protect your information in accordance with this notice.

Security

When you give us information we take steps to make sure that your personal information is kept secure and safe with any computers used by us being password protected. Online systems are similarly password protected and may include two step authentication.

How long we will keep your information?

We review our data retention periods regularly and will only hold your personal data for as long as is necessary for the relevant activity, as required by law or as set out in any relevant contract we have with you. Note that we may need to contact you beyond the end date of any tenancy with regard to utility bills, left property, misdirected mail, etc. Right to Rent data must be kept for one year after the end of a tenancy and date relating to accounting information may require to be kept for up to six years.

Your Rights

You have the right at any time to:

- ask for a copy of the information about you held by us in my records;
- require us to correct any inaccuracies in your information;
- make a request to us to delete what personal data of yours we hold; and
- object to receiving any marketing communications from us.

If you would like to exercise any of your rights above please contact us at bn@danobe.co.uk.

Should you wish to complain about the use of your information, we would ask that you contact us to resolve this matter in the first instance. You also have the right to complain to the Information Commissioner's Office in relation to my/ our use of your information. The Information Commissioner's contact details are noted below:

England:

Information Commissioner's Office Wycliffe House, Water Lane Wilmslow, Cheshire, SK9 5AF Telephone: 0303 123 1113 Email: <u>casework@ico.org.uk</u>

Scotland:

The Information Commissioner's Office – Scotland 45 Melville Street, Edinburgh, EH3 7HL Telephone: 0131 244 9001 Email: <u>Scotland@ico.org.uk</u>

Wales:

Information Commissioner's Office 2nd floor, Churchill House Churchill way, Cardiff, CF10 2HH Telephone: 029 2067 8400 Email: <u>wales@ico.org.uk</u>

Northern Ireland:

Information Commissioner's Office 3rd Floor, 14 Cromac Place Belfast, BT7 2JB Telephone: 028 9027 8757 Email: <u>ni@ico.org.uk</u>

The accuracy of your information is important to us - please help us keep my/ our records updated by informing us of any changes to your email address and other contact details.