

# Privacy Notice

## 1. Who we are

Unite Integrated Solutions plc is a subsidiary of The UNITE Group Plc and is the data controller responsible for your data. We are the UK's leading provider of student accommodation as well as a provider of young professional build-to-rent accommodation.

You can contact us about this notice or about the way we process your data:

- Write to us at: Data Protection Team, Unite Integrated Solutions plc, South Quay House, Temple Back, Bristol, BS1 6FL
- Email us at [dataprotection@unite-group.com](mailto:dataprotection@unite-group.com)

This privacy notice aims to give you information on how the Unite group of companies collects and processes your personal data.

This notice applies to personal information processed by us for tenants and prospective tenants of our 180 Stratford property.

## 2. About this notice

This privacy notice has been set out for Stratford 180 tenants and your interactions with us and our third-party service providers. This notice covers personal data processed by Unite Integrated Solutions that can identify you as an individual or is capable of doing so.

This notice does not cover:

- Statistical, aggregated or anonymous information
- Personal data collected by third party organisations outside of our instruction where this is the case, we encourage you to read their privacy notice to understand how they are processing your data.

It is important that you read this privacy notice so that you are fully aware of how and why we are using your data.

### 3. The personal data we collect and process about you and how we use it

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

In order to provide accommodation to you, we collect the following data:

- Title, first name, last name,
- Date of birth
- Gender
- Photo ID
- Proof of address
- Address
- Email address
- Contact number(s)
- Address at 180 Stratford
- Bank account and payment card details
- Pre onboarding process (-viewings, understanding room requirements-, enquires)
- The outcome of your identity verification and credit check

We will use your personal data:

- To deliver the services that you have contracted to
- To refer your contact information to our energy provider so they can issue bills by post or email
- To administer and process billing
- Where we need to comply with a legal or regulatory obligation
- To register and protect your deposit, and send you your deposit protection certification (if applicable)

We also process video recording of you in the property or an external area covered by our CCTV cameras. We use CCTV to prevent and detect criminal activity, fraud and misuse of or damage to our property and investigate any allegations, misuse or damage.

## 4. How your personal data is collected

We use different methods to collect data from and about you as follows.

### Direct interactions

Personal data is collected when you:

- contact us through Rightmove
- contact us directly by telephone (02045472790), email or letter
- apply to become a tenant of a property we manage

We may also collect information when we contact you during and after your tenancy depending on the circumstances.

### Third parties

We will receive personal data about you from the following third parties we contract to service your tenancy.

- Rightmove – provide us with an expression of interest for us to follow up on.
- RentProfile – provide us with information in order for us to complete required immigration status checks and undertake credit reference or other checks for tenants or prospective tenants; and provide us with information in order for us to complete our required identity and anti-money laundering checks
- PingLocker – to service maintenance requests
- Inventory Hive – to manage your inventory reports.

## 5. Who we share your personal data with

We will share your data with the following companies:

- Welcome Energy – to refer your contact details to our energy provider so that they can issue bills by post or email
- Apudos – to facilitate the parcel management service
- Inventory Hive – to issue your pre arrival and post departure inventories
- STA International - to collect any arrears from you
- TDS and MyDeposits - to protect your deposit

## **6. Sharing your personal data when required by law**

Our purpose for using your data may change where it is necessary to do so to protect or defend our legal rights or the legal rights of others. In these instances we may disclose the information you give us/we receive in order to comply with the law and our regulatory obligations. This information will be used as necessary, including to investigate, prevent or take action regarding illegal activities, suspected fraud, or situations involving potential threats to the physical safety of any person.

## **7. How long we keep your information**

The periods for which we keep your information will vary according to the purpose for which we use the information. To work out how long we keep each data record for, we consider why we hold it, how sensitive it is, how long the law says we need to keep it, and what the risks are.

Unless there is a specific legal requirement to keep your information, we will not keep it for longer than necessary for the purposes for which it was collected or for which it is to be further processed. We have an internal data retention schedule that details how long we keep each data record and we will securely delete your information in line with this.

## **8. How we protect your information**

Personal data is stored in a secure system with restricted access areas depending on the type of data being stored. We have strict security procedures covering the storage and disclosure of this information in order to prevent unauthorised access. Our employees can only access data that is appropriate and necessary for their role and we carry out identity verification checks before disclosing any personal information.

Where we use third party service providers, we disclose only the personal information necessary for them to deliver the required services. We carry out security due diligence to ensure they have satisfactory security and confidentiality measures in place, and contracts are in place to ensure they only use it for the purpose for which it was intended.

## **9. Our lawful bases for processing your data**

Data protection law requires us to have a lawful basis for using your personal data. At least one of the following must apply: consent, contract, legal obligation, legitimate interest, public interest or vital interests. In this section we explain which one we rely on when we use your data in a certain way, as detailed in the previous sections.

**We use your information for the performance of our contract with you:**

- When you or a third party acting on your behalf signs a tenancy agreement
- To undertake our required identity verification, immigration status and anti-money laundering checks
- To collect and recover money when you are in arrears
- When you raise a maintenance request

**We use your information for our legitimate business interests for the following:**

- To register you as a prospective tenant or tenant
- When you log in to your PingLocker account
- When you contact us with an enquiry or a complaint
- To use CCTV in and outside of our buildings
- To conduct customer satisfaction surveys or to ask you to leave a review
- To share your data with a debt collection company if you are in arrears
- To notify you of a parcel delivery or other service-related message

**We must have your consent to use your data for the following purposes:**

- To process any medical and/or disability, information we hold on you (if disclosed)

**We have a legal obligation to use your information:**

- To register and protect your deposit
- To create a personal emergency evacuation plan (PEEP) as required

## **10. Your rights in relation to your personal data**

You have various rights relating to your personal data, which we have summarised below. To exercise any of these rights, please contact [dataprotection@unite-group.com](mailto:dataprotection@unite-group.com). We process and respond to all requests

regarding personal data within one calendar month, but if the request is going to take longer to process we will advise you of this.

We may ask for additional information to verify your identity to ensure we are sharing personal data with the correct person or that we believe is necessary to comply with a request. Please note that whilst we will carefully assess every request we receive, we may not always have to comply. When this happens, we will explain why.

### **Your right to be informed**

You have the right to be provided with clear, transparent and easily understandable information about how we use your personal data and your rights. Therefore, we are providing you with the information in this privacy notice.

### **Your right of access**

You have the right to access the personal data we hold about you.

### **Your right to correct the personal data we hold on you**

You have the right to correct, amend or update your personal data if it becomes inaccurate or incomplete.

### **Your right to erase your personal data**

You have the right to ask us to erase your personal data although, for legal reasons, we might not always be able to do it.

### **Your right to restrict the processing of your personal data**

You have the right to restrict, 'block' or suppress further use of your information if:

- the accuracy of your personal data is contested;
- your personal data has been processed unlawfully by us but you do not want to request erasure; or
- we no longer need your personal data for our original purpose but it is required to establish, exercise or defend legal rights.

When processing is restricted, we can still store your information but may not use it further. We keep records of people who have asked for further use of their information to be 'blocked' to make sure the restriction is respected in the future.

### **Your right to consent and/or withdraw consent**

If you have given your consent to allow us to process your personal data, you also have the right to withdraw your consent at any time.

### **Your rights in relation to automated decision making including profiling**

Automated decision making is a decision made by automated means, without any human involvement, which has legal consequences or something to a similar effect (e.g. credit checking). We don't carry out automated decision making but if we did we would make it clear where decisions are being made.

### **Your right to data portability**

You have rights to obtain and reuse your personal data for your own purposes in a commonly used machine-readable format, and to have your personal data transferred to another data controller on your request.

### **Your right to object to processing**

You have the right to object, on grounds relating to your situation at any time, to the processing of your personal data that is based on us exercising our legitimate interests. If we can show compelling legitimate grounds for processing your personal data which we consider override your interests, rights and freedoms, or we need your personal data to establish, exercise or defend legal claims, we can continue to process it. Otherwise, we must stop using the relevant information.

You have the absolute right to object at any time to the use of your personal data for direct marketing purposes.

### **Your right to make a complaint**

If you are unhappy about the way in which we have used your personal data, please let us know by contacting us as detailed in the 'Who We Are' section and we will try to resolve your complaint. If we are unable to resolve your complaint to your satisfaction, you have the right to lodge a complaint about the way we handle or process your personal data with the Information Commissioner's Office.

## **11. Updates to this privacy notice**

This notice was last updated on: 16<sup>th</sup> August 2023.

If we change the way in which we use or share your personal information we will send you a just-in-time notice or update this Privacy Notice. We will notify you of any significant changes and where necessary, will obtain your consent before using your personal information for any new purpose.