

Privacy Notice for Residential Tenancies

About this Notice

Welcome to our privacy notice. Derwent London plc ("**Derwent, we or us**") is committed to protecting your personal information when you use our services. This notice explains how we collect, retain and process your personal information.

Your rights regarding Processing of your personal information

Under certain circumstances, by law you have the right to:

- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request access to the personal information we hold about you.
- Request correction of the personal information that we hold about you.
- Request erasure of your personal information.
- Request the restriction of processing of your personal information.
- Request the transfer of your personal information to another party in a commonly used form.

For more information on your rights or to exercise your rights please see Point 2 of this Notice which provides various ways that you can get in touch with us.

1. Your personal information

Here we set out how the personal information that we collect about you will be used. We are committed to observing relevant legal and regulatory requirements and employing appropriate security measures in order to protect your personal information.

2. Contacting us

For the purposes of data protection legislation, Derwent is a “controller” meaning that we determine the purpose and means of processing the information we collect from you. If you ever have any questions, comments or complaints about this notice, or any of its contents, please contact us via any of the following means and we will be pleased to assist you:

David Lawler, Company Secretary
company.secretary@derwentlondon.com
0207 659 3000

3. Information that we collect

This section details the types of information we collect from you:

- information that you provide to us from time to time including through our website or use any of our services, or when you submit queries to us;
- if you contact us by any means, we will keep a record of that correspondence and information that you provide to us in that correspondence;
- information provided by estate agents that you have engaged to secure properties with Derwent, including:
 - name;
 - addresses;
 - profession;
 - financial details;
 - passport (including visa details if applicable);
 - email address; and
 - phone number.
- details of your visits to any of our websites, please see our Cookies policy for details which can be found at <https://www.derwentlondon.com/texts/cookie-policy>;

4. How we use your information

We use information supplied by you:

- to confirm your identity and allow us to carry out checks in the interest of security and to prevent fraud;
- to gain references on you;
- to assess your right to rent in the UK;
- to provide you with services;

- to improve the services that we offer;
- to respond to your queries;
- to carry out our obligations under any contracts entered into between you and us;
- to notify you about any changes to our services and/or our websites;
- to comply with legal and regulatory requirements that apply to us; and
- for general statistical analysis.

5. Lawful processing

In terms of the legal bases we rely on to process your information, these are where the processing is necessary:

- for the performance of a contract with you for provision of our services or to take steps at your request prior to entering into such a contract;
- to comply with our legal obligations;
- for our legitimate interests in:
 - ensuring the quality of the services we provide to you;
 - communicating with you; or
- where you have consented to such use

If there is ever a need to process your sensitive and special categories of information (this includes data concerning your health, personal data revealing your racial or ethnic origin, political opinions, religious or philosophical beliefs, or data concerning sexual orientation) we will do so where we have asked for your explicit consent or otherwise where this is necessary:

- for the establishment, exercise or defence of legal claims;
- in the case that you have obviously made information public (e.g. on social media) we will process sensitive/special categories of information for the purposes of carrying out our legal obligations.

If provision of your personal information is a legal or contractual requirement or a requirement necessary to enter into a contract with us, and you choose not to provide it, we may not be able to perform some of the tasks we needed in order to provide certain services to you.

If you do choose to provide your consent you can withdraw it at any time by contacting us at the above details.

6. Sharing your information

We will not pass your information on to third parties except:

- we will provide your information to our service providers & local authorities to allow them to assist us with delivering the services that you have requested, under the following categories:
 - maintenance companies;
 - utility companies;
 - credit reference agencies;
 - law enforcement agencies;
 - lawyers;

- referencing companies;
 - inventory companies; and
 - information technology and information security supplier and providers.
- law enforcement agencies and regulators where we are under a duty to disclose or share your information in order to comply with any legal or regulatory obligation, or if we reasonably consider that this is necessary to help prevent or detect fraud or other crime or to protect the rights, property, or safety of Derwent, our customers or others;
 - if Derwent (or all or part of its assets) were to be acquired by a third party, in which case personal data about you as one of our customers would be one of the transferred assets;
 - if you have consented to any disclosure to a third party.

7. Where we store & use your information

We currently do not transfer, use or store your personal information outside of the European Economic Area (“EEA”).

We have made efforts to be provided with information on where our third party suppliers store your personal data and have not been notified of any territories outside of the EEA where such data may be stored.

In the event that it is required for us to transfer personal data outside of the EEA we will update this notice to list the relevant countries. Any changes will be communicated to you via an update to this privacy notice.

Transfers to our third party service providers are to enable them to use and store your personal information on our behalf. We will, however, put in place appropriate security procedures in order to protect your personal information. You can request further details on these procedures by contacting us at the above details.

8. Keeping your information

We will keep your information only for as long as necessary depending on the purpose for which it was provided. At present the majority of the information that you provide shall be retained for a period of 5 years post-tenancy. Further details of retention periods for different aspects of your personal information are available from us.

When determining the relevant retention periods, we will take into account factors including:

- legal obligations under applicable law to retain data for a certain period of time
- statute of limitations under applicable law(s)
- (potential) disputes, and
- guidelines issued by relevant supervisory authorities.

9. Security

We have put in place measures to protect the security of your information.

These measures are intended to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Unfortunately, the transmission of information via email is not secure. Therefore, if you use email for communicating with us, we cannot guarantee that it will remain confidential whilst in transit.

10. Your rights

You have the right to be provided with clear, transparent and easily understandable information about how we use your information and further rights granted to you under data protection legislation.

Under certain circumstances, by law **you have the right to:**

- Object to processing of your personal information where we are relying on a legitimate interest (or that of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes. You may further request that your information is deleted if you have objected to its processing.
- Request access to your personal information (commonly known as a "data subject access request"). We will provide a copy of the personal information we hold about you.
- Request correction of the personal information that we hold about you. Whilst we endeavour to keep our records up to date and accurate, your assistance in their accuracy is always appreciated.
- Request erasure of your personal information. This enables you to ask us to delete or remove your personal information. However, as noted in this notice, you may not be able to access certain services or your engagement with us may be terminated if it is a requirement to have this information.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party in a machine-readable, commonly used and structured format.

To exercise any of the above rights, please contact us at the details provided above. The various rights are not absolute and each is subject to certain exceptions or qualifications.

11. Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

12. Fees

In some cases, we may charge a reasonable fee if your request for access to your information is clearly unfounded or excessive, or if you request multiple copies of the information. Alternatively, we may refuse to comply with the request in such circumstances.

13. What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

14. Right to complain

If you wish to request further information about any of the above rights, or if you are unhappy with how we have handled your information, contact us at the details above.

If you are not satisfied with our response to your complaint or believe our processing of your information does not comply with data protection law, you can make a complaint to the Information Commissioner's Office ("ICO"): <https://ico.org.uk/global/contact-us/> 0303 123 1113.

15. Changes to our Privacy Notice

We keep our privacy notice under regular review and any updates in the future will be posted on our website and the most recent version of this "Privacy Notice". Where appropriate, changes may be notified to you by post or email.