



## **PRIVACY NOTICE for Essex Student Lets Limited T/A SU Homes Effective 1<sup>st</sup> September 2021**

At SU Homes we've made it our mission to always protect and respect your privacy and to ensure that all Personal Information shared with us is treated with the utmost care. SU Homes has created this Privacy Notice in order to demonstrate our commitment to the privacy of all our prospective tenants, tenants, landlords, guarantors and service providers.

This Privacy Notice explains when and why we collect personal ("data") information about you, how that data is stored, used and kept safe. This notice also explains your rights and choices in relation to your personal data.

Personal data is any information, held in any form that relates to you as an identifiable individual.

### **Who we are**

SU Homes is the trading name of Essex Student Lets Limited, a company registered in England and Wales (no. 7413547). Our registered office is Wivenhoe Park, Colchester, Essex, CO4 3SQ.

Our Website can be found <https://www.essexstudent.com/suhomes/>

Essex Student Lets Limited is a wholly owned subsidiary of the University of Essex Students' Union, a charity registered in England & Wales (no. 1140278)

### **How to contact us**

Any questions regarding this Privacy Notice and our privacy practices should be sent for the attention of the Data Controller:

By email to: [sudata@essex.ac.uk](mailto:sudata@essex.ac.uk);

In writing to: SU Homes, c/o University of Essex Students' Union, Wivenhoe Park, Colchester, Essex CO4 3SQ; OR

By telephone: 01206 863211

For business enquiries please contact the SU Homes team:

By email to: [suhomes@essex.ac.uk](mailto:suhomes@essex.ac.uk)

By telephone: 01206 878978

Or visit our office: SU Homes, Square 3, Wivenhoe Park, Colchester, Essex. CO4 3SQ

### **Scope**

This Privacy Notice applies to websites on behalf of Essex Student Lets Limited (hereafter "SU Homes") and the entirety of its operations within the UK.

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### How Do We Collect Information From You?

- **Information you give us directly**

For example:

- When you register to receive property details from us
- When you enter into a contract with us
- When you complete a survey
- When you correspond with us

- **When you visit our website**

It is standard practice for web servers to collect data automatically about all requests for files (web pages, images, etc.). Data automatically collected will include:

- your IP address
- details about your web browser
- details about files requested
- date and time of requests for each file requested
- the referring page, if any, from which you may have followed a hyperlink
- search times and search results
- the domain from which your request originated
- your username, if you have authenticated with the web server

This information is used to improve the services we offer.

Information on the use of cookies can be found under the “Cookies and Web Beacons” section below.

Some websites of the Union may contain links to websites not owned or operated by the Union. The Union is not responsible for the content, privacy policies, or practices of those websites. We recommend that you review the privacy policies of each site you visit.

- **Social Media**

When you interact with us on social media platform such as Facebook and Twitter we may obtain information about you (for example when you tag us in on photos). The information we receive will depend on the privacy preferences you have set up on those types of platforms.

### What Type Of Personal Information Do We Collect?

“**Personal Information**” that will be collected or processed by SU Homes includes:

Tenants/Prospective tenants	Landlords
Name	Name
Address	Address
Telephone number	Telephone number
Email address	Email address
Bank account details	Bank Account details
ID (e.g. Driving licence)	ID (e.g. Driving licence)
Student registration ID (PRID)	Proof of address
Passport details	Land registry records
Visa details (where applicable)	NRL Approval number (where applicable)
Course	Insurance details
Next of Kin contact details	
Date of birth	
Nationality	
Guarantors	Service Providers
Name	Name
Address	Address
Telephone number	Telephone number
Email address	Email address
ID (e.g. Driving licence)	Bank Account details
Proof of address	Insurance details
Salary confirmation	

Some web browsers may transmit “do not track” signals. Web browsers may incorporate or activate these features differently, making it unclear if users have consciously activated them. As a result, at this time we do not take steps to respond to such signals.

SU Homes may collect Personal Information in a variety of ways including directly from tenants and landlords while online when you use any of our online tools or features or applications.

## How We Use Your Personal Information

SU Homes collects and uses your Personal Information to:

- Enable the fulfilment of contractual requirements with you
- Facilitate the collection and payment of rent and deposits etc.
- Enable the registration of deposits with the DPS
- Enable the provision of property maintenance services
- Evaluate and improve our services to you

We process Personal Information submitted by tenants, landlords, guarantors and service providers for the purpose of providing the above-referenced services (collectively, the “**Services**”) to tenants, landlords, guarantors and service providers. To fulfill these purposes, we may access Personal Information to provide the Services, to prevent or address service or technical problems, to respond to customer support matters, to follow the instructions of a customer who submitted the Personal Information, or in response to contractual requirements with our tenants, landlords, guarantors and service providers.

## Lawful Basis For Processing Your Personal Information

### **Contractual**

Where you have entered into a contract with SU Homes, such as a Tenancy Agreement, we will process your Personal Information in order to meet our obligations and exercise our rights in terms of that contract.

### **Consent**

There may be some occasions where we seek your consent to process Personal Information but in those cases we will provide full details of what SU Homes is seeking consent for, so that you will be able to carefully consider whether to provide that consent.

### **Legal**

If the law requires us to, we may need to collect and process your data, for example for the purpose of confirming your right to rent in the UK.

### **Legitimate Interest**

In other cases, the Union has a legitimate interest in processing Personal Information in a way which might be reasonably expected for the purpose of a client relationship.

## How We Process Your Personal Information

When processing Personal Information SU Homes ensures that:

- it is processed lawfully, fairly and in a transparent manner (‘lawfulness, fairness and transparency’);
- it is collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; (‘purpose limitation’)
- it is all adequate, relevant and limited to what is necessary in relation to the purposes for which the Personal Information is processed; (‘data minimisation’)
- it is all accurate and, where necessary, kept up to date and that reasonable steps will be taken to ensure that Personal Information that is inaccurate, having regard to

- the purposes for which they are processed, are erased or rectified without delay ('accuracy')
- it is kept in a form which permits identification of you for no longer than is necessary for the purposes for which the Personal Information is processed; ('storage limitation')
  - it is processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').

SU Homes will facilitate any request from you to exercise your rights under data protection law and the General Data Protection Regulation as appropriate, always communicating in a concise, transparent, intelligible and easily accessible form and without undue delay.

SU Homes will also:

- ensure that the legal basis for processing Personal Information is identified in advance and that all processing complies with the law.
- not do anything with your Personal Information that you would not expect given the content of this policy.
- ensure that appropriate information is provided advising how and why Personal Data is being processed, and in particular advising data subjects of their rights.
- only collect and process the Personal Information that we need for the purposes we have identified in advance.
- ensure that as far as possible the Personal Information we hold is accurate, or a system is in place for ensuring that it is kept up to date as far as possible.
- only hold onto your Personal Information for as long as it is needed after which time we will securely erase or delete the personal data. SU Homes Data Retention Policy sets out the appropriate period of time.
- ensure that appropriate security measures are in place to ensure that Personal Information can only be accessed by those who need to access it and that it is held and transferred securely.

## **Your Choices and Access to Your Personal Information**

### **Direct Mailing:**

SU Homes will only send direct mail via email or post if you have opted in to receive such information. You can opt out from receiving these communications at any time by following the opt out instructions provided in the email or written correspondence.

SU Homes honors a "once out – always out" policy. Once you opt out, you are opted out of that type of communication and that brand until we are explicitly told in writing to opt you back in.

SU Homes may send you periodic information via email or post for legitimate interest purposes. These communications will provide updates and information that would be reasonably expected in a client relationship. These communications may be in the form of a newsletter or email updates. You have the right to opt out of receiving these communications by contacting SU Homes directly via email, post, telephone, or by visiting the SU Homes office. The Business contact details for SU Homes can be found above under "How to contact us".

**Subject access:** the right to request information about how Personal Information is being processed including whether Personal Information is being processed and the right to be

allowed access to that data and to be provided with a copy of that data along with the right to obtain the following information:

- the purpose of the processing
- the categories of personal data
- the recipients to whom data has been disclosed or which will be disclosed
- the retention period
- the right to lodge a complaint with the ICO in the United Kingdom
- the source of the information if not collected direct from the subject
- the existence of any automated decision making.

**Rectification:** the right to allow a data subject to rectify inaccurate Personal Information concerning them.

**Erasure:** the right to have data erased and to have confirmation of erasure, but only where:

- the data is no longer necessary in relation to the purpose for which it was collected; or
- where consent is withdrawn; or
- where there is no legal basis for the processing; or
- there is a legal obligation to delete data.

**Restriction of processing:** the right to ask for certain processing to be restricted in the following circumstances:

- if the accuracy of the personal data is being contested; or
- if our processing is unlawful but the data subject does not want it erased; or
- if the data is no longer needed for the purpose of the processing but it is required by the data subject for the establishment, exercise or defence of legal claims; or
- if the data subject has objected to the processing, pending verification of that objection.

**Data portability:** the right to receive a copy of Personal Information which has been provided by the data subject and which is processed by automated means in a format which will allow the individual to transfer the data to another data controller.

**Object to processing:** the right to object to the processing of Personal Information relying on the legitimate interests processing condition unless SU Homes can demonstrate compelling legitimate grounds for the processing which override the interests of the data subject or for the establishment, exercise or defence of legal claims.

Personal Information is to be used for a purpose other than those for which it was originally collected or subsequently authorised by such user. We will treat as sensitive any Personal Information received from a third party where the third party identifies and treats it as sensitive.

### **Sharing Personal Information with Third Parties**

We may pass your Personal Information to our carefully selected third party providers, suppliers, and agents for the purpose of providing services to you on our behalf or providing services to support the Union's functions, such as email, website, payment processing and market research. We will also share information with associated parties, such as our Data Controller, the University

of Essex Students Union and its subsidiary UESU Ltd and the University of Essex. We may also transfer personal information to agents for email marketing purposes.

In order to provide for adequate protection of your Personal Information, we have in place security and contractual arrangements with such third parties, agents and suppliers to ensure the protection of your Personal Information. If Personal Information is transferred from within the UK to a jurisdiction outside the EEA, it is done so under a Data Transfer Agreement, which contains standard data protection contract clauses, which have been adopted by the European Commission, and where safeguards have been put in place for personal information that is transferred outside of the EEA. By submitting your Personal Information to us, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Notice.

SU Homes (as a trading subsidiary of the University of Essex Students' Union) and the University of Essex work in partnership to improve the student experience, retention and representation and may collaborate on joint initiatives and service provision to help deliver these aims. Both entities also have a shared responsibility to look after the welfare and security of students of the University of Essex. In addition the Union occupies premises owned by the University of Essex and therefore shares a number of services provided directly by the University and third party providers. We may share data with the University of Essex for the purposes of:

- Referrals in connection with accommodation issues, with your consent
- Anonymised statistics and student feedback to aid the evaluation and improvement of student services
- Incident management, health & safety, security, welfare and crime prevention

We have in place an Information Sharing Agreement with the University of Essex in order to provide adequate protection of your personal information.

In addition to disclosures to third party providers and Agents as described above, we may disclose or transfer Personal Information in connection with, or during negotiations of, any merger, sale of company assets, product lines or divisions, or any financing or acquisition. We may also disclose Personal Information to prevent damage or harm to us, our Services, or any person or property, or if we believe that disclosure is required by law (including to meet national security or law enforcement requirements), or in response to a lawful request by public authorities. Except as described in this Privacy Notice, we will not otherwise disclose Personal Information to third parties unless you have been provided with an opportunity to opt in to such disclosure.

SU Homes does not release the Personal Information it collects from you to any unrelated third parties so that they may send you commercial promotions or offers for products or services.

Except as described in this Privacy Notice, we will not otherwise disclose personal data to any third parties unless you have provided consent to such disclosure and, in the case of personal data collected from children, the appropriate verifiable consent is obtained.

If an individual wishes to opt out or limit the use and disclosure of their personal data to a third party or a use that is incompatible with the purpose for personal data was originally collected or authorised, the individual may send such request to [sudata@essex.ac.uk](mailto:sudata@essex.ac.uk).

When SU Homes transfers Personal Information to countries other than the country where it was provided, we do so in compliance with applicable data protection laws. Copies of the Personal

Information at the point of origin are deleted on a regular basis. Any transfers of Personal Information from guests outside the European Economic Area (the "EEA"), will comply with GDPR requirements, as appropriate, in all respects.

## **Personal Information Security**

SU Homes maintains reasonable and appropriate security measures designed to help protect against loss, misuse, and alteration of Personal Information collected by SU Homes, which include:

- physical and logical access controls, including firewall, limited access, and SSL encryption technology, that limit who can access personal data based on business/processing need;
- privacy notices for personal data (this document) and for employee personal data (a copy of which may be requested at [sudata@essex.ac.uk](mailto:sudata@essex.ac.uk));
- annual employee training on our privacy policies;
- employees who are bound by confidentiality obligations;
- the appointment of a Data Controller to handle all personal data incidences or issues, including, without limitation, the handling of individual requests related to his/her personal data processed by SU Homes; and
- The University's Information Security Policy, and the University of Essex Students' Union Data Breach Policy that contain incident response plans for escalation and resolution of data breach incidents.

## **Cookies and Web Beacons**

The Union uses web beacons in emails to track traffic from the email to specific pages on our websites. You may be able to adjust your browser so that your computer either does not accept cookies, or notifies you when a website tries to deposit a cookie into your computer. Our website uses cookies however; our cookies do not contain confidential Personal Information such as your home address, telephone number, or credit card information. We do not exchange cookies with any third parties.

## **Changes to This Privacy Notice**

We may amend this Privacy Notice at any time. If we make any changes in the way we collect, use, and/or share your Personal Information, we will notify you by sending you an email at the last email address that you provided us, or by prominently posting notice of the changes on the web sites covered by this Privacy Notice.

## **Data Controller**

Your Personal Information is protected in the United Kingdom by the Data Protection Act 2018 (the "Act"), the General Data Protection Regulation 2016/679; and all relevant EU and UK data protection legislation. Under the Act we will only process your Personal Information in a lawful and fair manner. We will secure your Personal Information to prevent unauthorised access by third parties.

For the purposes of the Act, the data controller is the University of Essex Students' Union registered at Wivenhoe Park, Essex, CO4 3SQ and registered with the Information Commissioner's Office with registration number Z4727539.

All Personal Information collection and processing in the United Kingdom by the Union will be undertaken by the Union in accordance with the terms of this Privacy Notice

SU Homes are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. We cooperate with country data protection authorities if they believe that a privacy problem has occurred.

If you believe that SU Homes has not complied with your rights in relation to your personal data in relation to processing in or related to the United Kingdom, you can complain to the Information Commissioner's Office. Their contact details are available at [www.ico.org.uk](http://www.ico.org.uk)

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