

PRIVACY POLICY BOND HOUSING GROUP AND PLACE GROUP



BOND HOUSING GROUP

This page sets out how we use and protect information which you give to us when you use this website and throughout your relationship with us.

We are committed to ensuring that your privacy is protected. When we ask you to provide information by which you can be identified, then it will only be used in accordance with our privacy statements. All information will be processed in accordance with the General Data Protection Regulations and the Data Protection Act 2018.

We may update these policies from time to time. You should check this page regularly to ensure that you are happy with any updates.

This policy is effective from 02 January 2019

Bond Housing Group (Lincoln) Ltd and its associated companies (The Lincoln Student Group Ltd and Lincoln Investment Holdings Ltd and Bond Housing Group (ABC Co-Living) Ltd (“the Associated Companies”) (together “the Group

Companies”) will lawfully protect and process your personal data in accordance with the General Data Protection Regulations and the Data Protection Act 2018 (“The Act”)

Bond Housing Group (Lincoln) Ltd is the Data Controller. Where data has been lawfully shared with and processed by the Associated Companies, they may also become a Data Controller. This privacy policy applies to the Group Companies.

The Group Companies can be contacted at:

Data Protection Compliance, Bond Housing Group, Unit 1 Sparkhouse, Ropewalk, Lincoln, LN6 7DQ or by email dataprotection@bondhousinggroup.com.

The Data Protection Number for each company is:

Bond Housing Group (Lincoln) Ltd ZA180282

Bond Housing Group (ABC Co-Living) Ltd ZA297595

The Lincoln Student Group Ltd ZA479037

Lincoln Investment Holdings Ltd

Place Homes Lincoln is a trading style of Bond Housing Group (Lincoln) Ltd used under licence from Place Group UK

The General Data Protection Regulations are to safeguard your personally identifiable information or personal data. This privacy notice will be regularly reviewed and updated.

Your rights:

You have a right of access to check your personal data to verify the lawful basis of processing. We are obliged to respond to an access request within 30 days and may not charge a fee unless the request is unfounded, excessive or repetitive. If a fee is charged it is to be a reasonable fee based upon the administrative cost of providing the information.

You have a right to rectification if the data we hold is either inaccurate or incomplete. If your data has been disclosed to third parties then we must inform them of the rectification, where possible.

You have a right to erasure of your data when consent is our basis of processing (the right to be forgotten). You may request that your personal data be erased, for example, where there is no compelling reason for its continued processing or where you withdraw consent. We will comply with your request unless we have another basis of processing justifying our retaining the data (for example a legal requirement or the defence of a legal claim).

You have some rights to ask us to restrict processing i.e. to block or suppress processing where, for example, the data may be incorrect and whilst the accuracy is verified. We are still permitted to store the data.

You do have a right to object to further processing of your personal data. We may be required to stop processing unless there is some other legitimate basis of processing such as a legitimate interest or a requirement for the exercise or defence of a legal claim.

Where the lawful basis for processing is your consent, you may withdraw consent at any time by writing to: Data Protection Compliance, Bond Housing Group, Unit 1 Sparkhouse, Ropewalk, Lincoln, LN6 7DQ or by email dataprotection@bondhousinggroup.com.

Where the provision of data is a statutory requirement, a contractual requirement or a requirement necessary to enter into a contract, a refusal to provide the data (or a withdrawal of consent relating to the data use) may mean that we are unable to provide you with our service (or that we have to cease providing our service).

How to lodge a complaint with the supervisory authority:

The supervisory authority responsible for data protection is the Information Commissioners Office (ICO) to whom concerns may be reported by phone on **0303 123 1113** or +44 1625 545 745 if calling from outside the UK or by email using the form on the website ico.org.uk

New Tenant Contact / Viewing Request Privacy Policy:

SUMMARY OF KEY INFORMATION TO UNDERSTAND WHEN REGISTERING WITH US AND REQUESTING TO VIEW PROPERTIES

When you submit a request for more information about a property and/or you submit a request to view a property (including requests submitted through our automated booking systems) and/or you complete a registration form, we may share your personal data with the relevant organisations or individuals set out in column F below. They may also become a data controller in respect of the data. We will continue to be a data controller in respect of the data.

We may share your personal data because we need to in order to supply the service, to comply with the law and to operate our business efficiently and lawfully. Where the provision of data is a statutory requirement, a contractual requirement or a requirement necessary to enter into a contract, a refusal to provide the data (or a withdrawal of consent relating to the data use) may mean that we are unable to provide you

with our service (or that we have to cease providing our service).

Before providing personal information to us about another person or persons, such as (but not limited to) where a lead tenant provides details about all the members of a group, you must obtain the other person(s) consent to their personal information being disclosed. You must also obtain the other person(s) consent to their personal information being processed in accordance this privacy policy. We are entitled to assume (unless we are advised otherwise in writing) that you have obtained the appropriate consent you require from another person or persons to share information with us in these circumstances.

When you request a viewing and/or ask for more information about a property, by providing an email address and/or telephone number (and any other contact information) you are expressly consenting in advance (by expressly opting in) to receive email notifications and/ or sms text alerts and/or telephone calls and/or Messenger messages and or WhatsApp messages based on this information for specific purpose set out in column D below and from the relevant organisations and individuals set out in column F below.

Our privacy policy allows us to lawfully share your relevant personal data with (for example) our letting and managing agents and our viewing clerks.

In the absence of express consent your data may also be lawfully processed because we have a legitimate interest in processing your data. A legitimate interest is when we have a business or commercial reason to process your personal data.

Information held:

The personal data we hold will include the information listed in column A. It may also include other sensitive data concerning health, if relevant.

The data may be collected and processed by those listed in column B (who is collecting it) and column F (who it may be shared with).

How the data is collected is identified in column C.

How we use your data:

Your personal data will be used for the activities in column D.

Our lawful basis for processing your data is set out in column E below and comprises a combination of consent and legitimate interest.

Recipients of personal data:

It will be necessary for us to process or share all or some of your personal data with a range of individuals, businesses and organisations and these may include those listed in column F.

Where is the data stored:

Your personal data is stored in the way described in column G and the data is always stored within the European Union or outside of the European Union but with an organisation operating under the General Data Protection Regulations.

Retention period and criteria used to determine the retention period:

We will retain your personal data for up to the time defined in column H. If the lawful basis for processing your data was consent then you may withdraw consent at any time, but where we had more than one lawful basis for processing, we may still be able to (or be obliged to) retain the data.

A	B	C	D	E	F	G	H
INFO HELD	WHO IS COLLECTING	HOW COLLECTED	WHY COLLECTED	LAWFUL PROCESS	WHO SHARED WITH	HOW STORED	DELETION DATE
Name Contact Details and any other information provided through any registration method	Staff (Bond Housing) Bond website(s) Bond Registration Form(s) Bond Actuity Booking Diary Zoopla Right Move Spareroom Accommodation For Students Cloud Letting (agent) Accommodation Marketing (agent) Place Group UK AQL (telecoms)	In person Phone Email Text Messenger WhatsApp Online Registration	To contact tenant applicants about properties and arrange viewings	Consent Legitimate Interest (contact with applicant whilst looking for property)	Staff (Bond Housing) Registration App (Bond property management software) Associated Companies Email and text system for Bond Housing and for Place Group UK Cloud Lettings (agent) Accommodation Marketing (agent) Viewing clerks Place Group UK Online Storage	Electronically Paper copies may be printed	Electronic 12 months after enquiry Paper 6 months after enquiry

New Tenant Application / On-boarding Privacy Policy:

SUMMARY OF KEY INFORMATION TO UNDERSTAND WHEN APPLYING TO RENT A PROPERTY FROM US

When you apply to rent a property from us we may share your personal data with the relevant organisations or individuals set out in column F below. They may also become a data controller in respect of the data. We will continue to be a data controller in respect of the data.

We may share your personal data because we need to in order to supply the service, to comply with the law and to operate our business efficiently and lawfully. Where the provision of data is a statutory requirement, a contractual requirement or a requirement necessary to enter into a contract, a refusal to provide the data (or a withdrawal of consent relating to the data use) may mean that we are unable to provide you with our service (or that we have to cease providing our service).

Before providing personal information to us about another person or persons, such as (but not limited to) where a lead tenant provides details about all the members of a group, you must obtain the other person(s) consent to their personal information being disclosed. You must also obtain the other person(s) consent to their personal information being processed in accordance this privacy policy. We are entitled to assume (unless we are advised otherwise in writing) that you have obtained the appropriate consent you require from another person or persons to share information with us in these circumstances.

By providing an email address and/or telephone number (and any other contact information) you are expressly consenting in advance (by expressly opting in) to receive email notifications and/ or sms text alerts and/or telephone calls and/or Messenger messages and or WhatsApp messages based on this information for specific purpose set out in column D below and from the relevant organisations and individuals set out in column F below.

Our privacy policy allows us to lawfully share your relevant personal data with (for example) our letting and managing agents, professional advisors and the local council.

We use Acceptacard and/or Worldpay to process cards payments. You provide information directly to Acceptacard and/or Worldpay. We will share personal information with Acceptacard and/or Worldpay only to the extent necessary for the purposes of processing any payments you make and dealing with charge-backs, refunds, complaints and queries relating to such payments. When you make a payment using these services we do NOT receive details from your card, so we will NOT receive the following PAN Number, three digit code or expiry date. We may receive information confirming the card registered address and name.

In the absence of express consent your data may also be lawfully processed because we have a legitimate interest, because we have a contractual relationship with you and/ or because we have a legal duty to process your data.

Information held:

The personal data we hold will include the information listed in column A. It may also include other sensitive data concerning health, if relevant.

The data may be collected and processed by those listed in column B (who is collecting it) and column F (who it may be shared with).

How the data is collected is identified in column C.

Note: We may also collect data from or via third parties such as credit referencing companies, referees (previous landlord/ current landlord/ employer) and the local council.

How we use your data:

Your personal data will be used for the activities in column D.

Our lawful basis for processing your data is set out in column E below and comprises a combination of consent, legitimate interest, contract fulfilment and legal obligation.

Recipients of personal data:

It will be necessary for us to process or share all or some of your personal data with a range of individuals, businesses and organisations and these may include those listed in column F.

Where is the data stored:

Your personal data is stored in the way described in column G and the data is always stored within the European Union or outside of the European Union but with an organisation operating under the General Data Protection Regulations.

Retention period and criteria used to determine the retention period:

We will retain your personal data for up to the time defined in column H. If the lawful basis for processing your data was consent then you may withdraw consent at any time, but where we had more than one lawful basis for processing, we may still be able to (or be obliged to) retain the data.

A	B	C	D	E	F	G	H
INFO HELD	WHO IS COLLECTING	HOW COLLECTED	WHY COLLECTED	LAWFUL PROCESS	WHO SHARED WITH	HOW STORED	DELETION DATE
Name, Contact Details and any other information provided through any application method	Staff (Bond Housing) Bond Application Form(s) Place Group UK	In person Phone Email Text Messenger	Use on application form Use to reference applicant Use to contact applicant	Consent Legitimate Interest (Contact with applicant and completing the application and	Staff (Bond Housing) Registration App (Bond property management software) Associated Companies	Electronically Paper copies may be printed	Successful applicants 6 years after the tenant leaves and Failed applicants within 1 year of failure or drop

(unless information is separately specified below)		WhatsApp Online application form	Use on Tenancy Agreement Use on Guarantee	referencing applicant) Contract Fulfilment	Email and text system for Bond Housing and for Place Group UK Cloud Lettings (agent) Accommodation Marketing (agent) Place Group UK Online Storage Landlord Solicitor Accountant Surveyor Insurer Other Advisors Bankers/ Lenders		out
DOB	Staff (Bond Housing) Bond Application Form(s) Place Group UK	In person Phone Email Text Messenger WhatsApp Online Application	To check applicant is lawfully allowed to sign the Tenancy Agreement to rent the property (age 18+)	Contract Fulfilment	Staff (Bond Housing) Registration App (Bond property management software) Associated Companies Email and text system for Bond Housing and for Place Group UK Cloud Lettings (agent) Accommodation Marketing (agent) Place Group UK Online Storage Landlord Solicitor Accountant Surveyor Insurer Other Advisors Bankers/ Lenders	Electronically Paper copies may be printed	Successful applicants 6 years after the tenant leaves and Failed applicants within 1 year of failure or drop out
University Details	Staff (Bond Housing) Bond Application Form(s) Place Group UK	In person Phone Email Text Messenger WhatsApp Online Application	To check student status for council tax exemption	Legitimate Interest (to ensure obligations to local council are met and that any exemption can be applied for)	Staff (Bond Housing) Registration App (Bond property management software) Associated Companies Email system for Bond Housing and for Place Group UK Cloud Lettings (agent) Accommodation Marketing (agent)	Electronically Paper copies may be printed	Successful applicants 6 years after the tenant leaves and Failed applicants within 1 year of failure or drop out

					Place Group UK Online Storage Landlord Solicitor Accountant Surveyor Insurer Other Advisors Bankers/ Lenders Local Council		
Employment details	Staff (Bond Housing) Bond Application Form(s) Place Group UK	In person Phone Email Text Messenger WatsApp Online Application	To reference applicant for suitability as tenant	Legitimate Interest (to ensure applicant will be able to meet tenancy obligations)	Staff (Bond Housing) Registration App (Bond property management software) Associated Companies Email and text system for Bond Housing and for Place Group UK Cloud Lettings (agent) Accommodation Marketing (agent) Place Group UK Online Storage Applicant Employer Landlord Solicitor Accountant Surveyor Insurer Other Advisors Bankers/ Lenders	Electronically Paper copies may be printed	Successful applicants 1 year after the tenant leaves and Failed applicants within 1 month of failure or drop out
Previous and current landlord/ agent details					Staff (Bond Housing) Registration App (Bond property management software) Associated Companies Email and text system for Bond Housing and for Place Group UK Cloud Lettings (agent) Accommodation Marketing (agent) Place Group UK Online Storage		

Adverse Credit					<p>Previous Landlord Current Landlord Landlord Solicitor</p> <p>Staff (Bond Housing) Registration App (Bond property management software) Associated Companies Email and text system for Bond Housing and for Place Group UK Cloud Lettings (agent) Accommodation Marketing (agent) Place Group UK Online Storage Landlord Solicitor</p>		
National Insurance Number Passport Details Other ID (eg copy utility bill)	Staff (Bond Housing) Staff (Sparkhouse office reception) Place Group UK	In person Email Online Application	<p>To reference applicant for suitability as tenant Confirm address Confirm identity To assist with pursuing any arrears</p> <hr/> <p>Right To Rent</p>	<p>Consent Legitimate Interest (to ensure applicant will be able to meet tenancy obligations)</p> <hr/> <p>Legal Obligation</p>	<p>Staff (Bond Housing) Staff (Sparkhouse office reception) Associated Companies Email and text system for Bond Housing and for Place Group UK Cloud Lettings (agent) Accommodation Marketing (agent) Place Group UK Online Storage Landlord Solicitor Accountant HM Government</p>	Electronically Paper copies may be printed	Successful applicants 1 year after the tenant leaves and Failed applicants within 1 month of failure or drop out
Bank Details	Staff (Bond Housing) Bankers Go Cardless Place Group UK	In person Email Self Registration	<p>To ensure applicant has set up payment arrangements To be able to make refunds</p>	<p>Legitimate Interest (to ensure applicant will be able to meet tenancy obligations) Contract Fulfilment</p>	<p>Staff (Bond Housing) Associated Companies Email and text system for Bond Housing and for Place Group UK Cloud Lettings (agent) Accommodation Marketing (agent) Place Group UK</p>	Electronically Paper copies may be printed	Successful applicants 1 year after the tenant leaves and Failed applicants within 1 month of failure or drop out

					Online Storage Landlord Solicitor Accountant Bankers Go Cardless		
Next of Kin	Staff (Bond Housing) Bond Application Form(s) Place Group UK	In person Phone Email Text Messenger WatsApp Online Application	Emergency Contact To assist with pursuing any arrears	Legitimate Interest (to be able to contact NOK in an emergency and Legitimate Interest (to ensure applicant will be able to meet tenancy obligations)	Staff (Bond Housing) Registration App (Bond property management software) Associated Companies Email and text system for Bond Housing and for Place Group UK Cloud Lettings (agent) Accommodation Marketing (agent) Place Group UK Online Storage Landlord Solicitor	Electronically Paper copies may be printed	Successful applicants 1 year after the tenant leaves and Failed applicants within 1 month of failure or drop out
Guarantor Name, Contact Details and any other information provided through any application method	Staff (Bond Housing) Bond Application Form(s) Place Group UK	In person Phone Email Text Messenger WatsApp Online Application	To reference guarantor for suitability as guarantor To contact guarantor <hr/> Use on Guarantee	Legitimate Interest (to ensure guarantor will be able and willing to meet obligations) <hr/> Contract Fulfilment	Staff (Bond Housing) Registration App (Bond property management software) Associated Companies Email and text system for Bond Housing and for Place Group UK Cloud Lettings (agent) Accommodation Marketing (agent) Place Group UK Online Storage Landlord Solicitor	Electronically Paper copies may be printed	Successful applicants 6 years after the tenant leaves and Failed applicants within 1 year of failure or drop out
Card Details (PAN Number, three digit code expiry date etc) <hr/> Card address and name Details	Acceptacard / Worldpay	Online or by Phone	To process card payments	Consent Contract Fulfilment	Staff (Bond Housing) do not receive this information (PAN Number, three digit code expiry date etc) <hr/> Staff (Bond Housing) may receive the card	We do not receive this information <hr/> Successful applicants 1 year after the tenant	We do not receive this information <hr/> Successful applicants 1 year after the tenant

					address and name details	leaves and Failed applicants within 1 month of failure or drop out	leaves and Failed applicants within 1 month of failure or drop out
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Current Tenant Occupiers Privacy Policy:

SUMMARY OF KEY INFORMATION TO UNDERSTAND WHEN RENTING A PROPERTY FROM US

When you sign your tenancy agreement you will be expressly consenting to the use of your personal data for the day to day management of the property and the conduct of the landlord tenant relationship. We may share your personal data with the relevant organisations or individuals set out in column F below. They may also become a data controller in respect of the data. We will continue to be a data controller in respect of the data.

We may share your personal data because we need to in order to supply the service, to comply with the law and to operate our business efficiently and lawfully. Where the provision of data is a statutory requirement, a contractual requirement or a requirement necessary to enter into a contract, a refusal to provide the data (or a withdrawal of consent relating to the data use) may mean that we are unable to provide you with our service (or that we have to cease providing our service).

By providing an email address and/or telephone number (and any other contact information) you are expressly consenting in advance (by expressly opting in) to receive email notifications and/ or sms text alerts and/or telephone calls and/or Messenger messages and or WhatsApp messages based on this information for specific purpose set out in column D below and from the relevant organisations and individuals set out in column F below.

Our privacy policy allows us to lawfully share your relevant personal data with (for example) our maintenance contractors, our managing agents, our professional advisors, the local council and utility companies. We may also lawfully share your relevant personal data (which can include tenancy conduct information) with a prospective landlord, a prospective agent or a prospective mortgagor (lender) as well as joint tenants, guarantors and other occupiers.

We use Acceptacard and/or Worldpay to process cards payments. You provide information directly to Acceptacard and/or Worldpay. We will share personal information with Acceptacard and/or Worldpay only to the extent necessary for the purposes of processing any payments you make and dealing with charge-backs, refunds, complaints and queries relating to such payments. When you make a payment using these services we do NOT receive details from your card, so we will NOT receive the following PAN Number, three digit code or expiry date. We

may receive information confirming the card registered address and name.

In the absence of express consent your data may also be lawfully processed because we have a legitimate interest, because we have a contractual relationship with you and/ or because we have a legal duty to process your data.

We will retain all tenancy agreements for 10 years as we have a legitimate interest in doing so because we may be asked by the council to prove the historical use (and continued use) of a building for planning purposes.

The most common ways in which your data may be lawfully disclosed when renting from us is as follows:

WHO	REASONS
Advisors, consultants and other professional experts and banks and other financial organizations	We may disclose your relevant details to our solicitors, accountants, surveyors, insurers and any other professional advisors and bankers/lenders in the course of running our business, we would not disclose to any advisor, consultant, expert or bank/ financial organisation who was not subject to rules themselves about confidentiality in respect of both our and your data. The details disclosed will be limited to the extent necessary for us to obtain the advice we need and to comply with any legal obligations we have.
Other joint tenants, guarantors and other occupiers of the same property or building.	We may disclose your relevant details to the tenant other joint tenants in respect of the property, guarantors in respect of the property and other occupiers of the same property or building We may also disclose relevant details to a contractor, for them to complete a repair job at a property. The details disclosed will be limited to the extent necessary for them to undertake this work, and may involve providing your contact details for them to contact you to arrange the time of a repair.
Local and Central Government	We may disclose your details to Local and/or Central Government,, For example we may disclose your details to Local Government concerning any Council Tax, Housing Act or HMO Licensing matters and to Central Government or HMRC concerning our income and other tax matters. We also be asked by other government agencies such as benefits agency to confirm your address and dates of residency at our addresses as part of their own fraud audit . Sometimes requests from government agencies are made a considerable time after you have vacated. The details disclosed will be limited to the extent necessary for us to comply with any legal obligations we have.

Police Forces	We may disclose your relevant details to the police or other law enforcement agencies if we are asked to or if we are satisfied that you may be involved in any form of criminal activity in particular but not limited to terrorism, dealing in drugs or fraud at our property. The details disclosed will be limited to the extent necessary for us to comply with any legal obligations we have.
Legal obligations	Where we have a legal right or legal duty to disclose the details we may do so, although unless legally prevented from doing so (eg by a court order) we will normally tell you we are doing this, although we do not undertake to do so if we do not believe it to be appropriate In all cases the details disclosed will be limited to the extent necessary for us to comply with any legal obligations we have.
References	Where you have asked us to write a reference for you, you have consented for us to disclose details. We reserve the right to decline to provide a reference if you will not agree the terms and wording of the reference in advance. If we provide a reference on your behalf you will not be able to complain if we accurately disclose arrears or poor conduct.
Housing Act, Deposits and Right To Rent	We are required by law to protect tenancy deposits, to undertake right to rent checks and to licence certain multiple occupied properties. These legal obligations may all require us to disclose your relevant details. The details disclosed will be limited to the extent necessary for us to comply with any legal obligations we have.
Legal proceedings (possession/ arrears)	If legal proceedings are necessary this will result in relevant details being disclosed to tracing agents, solicitors and the court service

Information held:

The personal data we hold will include the information listed in column A. It may also include other sensitive data concerning health, if relevant.

The data may be collected and processed by those listed in column B (who is collecting it) and column F (who it may be shared with).

How the data is collected is identified in column C.

Note: We may also collect data from or via third parties such as credit referencing companies, referees (previous landlord/ current landlord/ employer) and the local council.

How we use your data:

Your personal data will be used for the activities in column D.

Your personal data will be processed during and after your tenancy and any subsequent tenancy arranged through us.

Our lawful basis for processing your data is set out in column E below and comprises a combination of consent, legitimate interest, contract fulfilment and legal obligation.

Recipients of personal data:

It will be necessary for us to process or share all or some of your personal data with a range of individuals, businesses and organisations and these may include those listed in column F.

Where is the data stored:

Your personal data is stored in the way described in column G and the data is always stored within the European Union or outside of the European Union but with an organisation operating under the General Data Protection Regulations.

Retention period and criteria used to determine the retention period:

We will retain your personal data for up to the time defined in column H. If the lawful basis for processing your data was consent then you may withdraw consent at any time, but where we had more than one lawful basis for processing, we may still be able to (or be obliged to) retain the data.

A	B	C	D	E	F	G	H
INFO HELD	WHO IS COLLECTING	HOW COLLECTED	WHY COLLECTED	LAWFUL PROCESS	WHO SHARED WITH	HOW STORED	DELETION DATE
Name and Contact Details	Staff (Bond Housing) Bond Application Form(s) Place Group UK	In person Phone Email Text Messenger WhatsApp Online application form	To create Tenancy Agreement To contact the tenant for property management To operate our business lawfully and efficiently To account for our taxes properly	Consent Contract Fulfilment Legitimate Interest	Staff (Bond Housing) Registration App (Bond property management software) Associated Companies Email system for Bond Housing and for Place Group UK Cloud Lettings (agent) Accommodation Marketing (agent) Place Group UK	Electronically Paper copies may be printed	6 years after the tenant leaves

			<p>Online Storage Landlord Local Council Solicitor Accountant Surveyor Insurer Other Advisors Bankers/ Lenders Maintenance Contractors HM Government Police</p>			
			<p>To use on prescribed information (deposit scheme) To use in legal proceedings (possession/ arrears) To use on HMO licence applications</p>	<p>Legal Obligation</p>	<p>Staff (Bond Housing) Registration App (Bond property management software) Associated Companies Email system for Bond Housing and for Place Group UK Cloud Lettings (agent) Accommodation Marketing (agent) Place Group UK Online Storage Landlord Deposit Scheme Trace Agent Solicitor Accountant Surveyor Insurer Other Advisors Bankers/ Lenders Court Service Local Council HM Government</p>	
			<p>To notify utility companies/ local council</p>	<p>Legitimate Interest (to facilitate to transfer of the utility services/ council tax on tenancy change over)</p>	<p>Staff (Bond Housing) Registration App (Bond property management software) Associated Companies</p>	

					<p>Email system for Bond Housing and for Place Group UK Cloud Lettings (agent) Accommodation Marketing (agent) Place Group UK Online Storage Landlord Utility Companies Local Council</p>		
<p>University Details</p>	<p>Staff (Bond Housing) Bond Application Form(s) Place Group UK</p>	<p>In person Phone Email Text Messenger WhatsApp Online Application</p>	<p>To check student status for council tax exemption</p> <hr/> <p>To notify student status for council tax exemption</p>	<p>Legitimate Interest (to ensure obligations to local council are met and that any exemption can be applied for)</p> <hr/> <p>Legal Obligation</p>	<p>Staff (Bond Housing) Registration App (Bond property management software) Associated Companies Email system for Bond Housing and for Place Group UK Cloud Lettings (agent) Accommodation Marketing (agent) Place Group UK Online Storage Landlord Solicitor Accountant Surveyor Insurer Other Advisors Bankers/ Lenders Local Council</p> <hr/> <p>Local Council</p>	<p>Electronically Paper copies may be printed</p>	<p>6 years after the tenant leaves</p>

<p>Employment details</p>	<p>Staff (Bond Housing) Bond Application Form(s) Place Group UK</p>	<p>In person Phone Email Text Messenger WhatsApp Online Application</p>	<p>To reference applicant for suitability as tenant</p>	<p>Legitimate Interest (to ensure applicant will be able to meet tenancy obligations)</p>	<p>Staff (Bond Housing) Registration App (Bond property management software) Associated Companies Email and text system for Bond Housing and for Place Group UK Cloud Lettings (agent) Accommodation Marketing (agent) Place Group UK Online Storage Applicant Employer Landlord Solicitor Accountant Surveyor Insurer Other Advisors Bankers/ Lenders</p>	<p>Electronically Paper copies may be printed</p>	<p>Subject to no tenancy arrears 1 year after the tenant leaves Otherwise within 1 year of the account being settled</p>
<p>Previous and current landlord/ agent details</p>					<p>Staff (Bond Housing) Registration App (Bond property management software) Associated Companies Email and text system for Bond Housing and for Place Group UK Cloud Lettings (agent) Accommodation Marketing (agent) Place Group UK Online Storage Previous Landlord Current Landlord Landlord Solicitor</p>		
<p>Adverse Credit</p>					<p>Staff (Bond Housing) Registration App (Bond property management software) Associated Companies</p>		

					Email and text system for Bond Housing and for Place Group UK Cloud Lettings (agent) Accommodation Marketing (agent) Place Group UK Online Storage Landlord Solicitor		
National Insurance Number Passport Details Other ID (eg copy utility bill)	Staff (Bond Housing) Staff (Sparkhouse office reception) Place Group UK	In person Email Online Application	To reference applicant for suitability as tenant Confirm address Confirm identity To assist with pursuing any arrears <hr/> Right To Rent	Consent Legitimate Interest (to ensure applicant will be able to meet tenancy obligations) <hr/> Legal Obligation	Staff (Bond Housing) Staff (Sparkhouse office reception) Associated Companies Email and text system for Bond Housing and for Place Group UK Cloud Lettings (agent) Accommodation Marketing (agent) Place Group UK Online Storage Landlord Solicitor Accountant HM Government	Electronically Paper copies may be printed	Subject to no tenancy arrears 1 year after the tenant leaves Otherwise within 1 year of the account being settled
Bank Details	Staff (Bond Housing) Bankers Go Cardless Place Group UK	In person Email Self Registration	To ensure applicant has set up payment arrangements To be able to make refunds	Legitimate Interest (to ensure applicant will be able to meet tenancy obligations) Contract Fulfilment	Staff (Bond Housing) Associated Companies Email and text system for Bond Housing and for Place Group UK Cloud Lettings (agent) Accommodation Marketing (agent) Place Group UK Online Storage Landlord Solicitor Accountant Bankers Go Cardless	Electronically Paper copies may be printed	Subject to no tenancy arrears 1 year after the tenant leaves Otherwise within 1 year of the account being settled
Next of Kin	Staff (Bond Housing) Bond Application Form(s)	In person Phone Email	Emergency Contact To assist with pursuing any arrears	Legitimate Interest (to be able to contact NOK in an emergency and	Staff (Bond Housing) Registration App (Bond property management	Electronically Paper copies may be printed	Subject to no tenancy arrears 1 year after the tenant leaves

	Place Group UK	Text Messenger WhatsApp Online Application		Legitimate Interest (to ensure applicant will be able to meet tenancy obligations)	software) Associated Companies Email and text system for Bond Housing and for Place Group UK Cloud Lettings (agent) Accommodation Marketing (agent) Place Group UK Online Storage Landlord Solicitor		Otherwise within 1 year of the account being settled
Guarantor Name, Contact Details and any other information provided through any application method	Staff (Bond Housing) Bond Application Form(s) Place Group UK	In person Phone Email Text Messenger WhatsApp Online Application	To reference guarantor for suitability as guarantor To contact guarantor <hr/> Use on Guarantee	Legitimate Interest (to ensure guarantor will be able and willing to meet obligations) <hr/> Contract Fulfilment	Staff (Bond Housing) Registration App (Bond property management software) Associated Companies Email and text system for Bond Housing and for Place Group UK Cloud Lettings (agent) Accommodation Marketing (agent) Place Group UK Online Storage Landlord Solicitor	Electronically Paper copies may be printed	6 years after the tenant leaves
Tenancy conduct information	Staff (Bond Housing) Bond Application Form(s) Place Group UK	In person In person Phone Email Text Messenger WhatsApp	To ensure effective property management To fulfil our role as HMO manager To report criminal activity <hr/> To supply references (on tenants request)	Legitimate Interest Legal Obligation <hr/> Consent	Staff (Bond Housing) Registration App (Bond property management software) Associated Companies Email system for Bond Housing and for Place Group UK Cloud Lettings (agent) Accommodation Marketing (agent) Place Group UK Online Storage Landlord Deposit Scheme Trace Agent Solicitor Accountant Surveyor	Electronically Paper copies may be printed	6 years after the tenant leaves

					Insurer Other Advisors Bankers/ Lenders Court Service Local Council Other Joint Tenants Guarantors Other occupiers of the same building Prospective Landlord Prospective Agent Prospective Mortgagor Police		
Tenancy Agreements	Staff (Bond Housing)	Filed Tenancy Agreements	To answer planning enquiries	Legitimate interest	Local Council Planning Inspectorate	Electronically Paper copies may be printed	10 years after the tenant leaves
Card Details (PAN Number, three digit code expiry date etc) <hr/> Card address and name details	Acceptacard / Worldpay	Online or by Phone	To process card payments	Consent Contract Fulfilment	Staff (Bond Housing) do not receive this information (PAN Number, three digit code expiry date etc) <hr/> Staff (Bond Housing) may receive the card address and name details	We do not receive this information <hr/> Successful applicants 1 year after the tenant leaves and Failed applicants within 1 month of failure or drop out	We do not receive this information <hr/> Successful applicants 1 year after the tenant leaves and Failed applicants within 1 month of failure or drop out

Guarantors Privacy Policy:

SUMMARY OF KEY INFORMATION TO UNDERSTAND WHEN ACTING AS GUARANTOR FOR A TENANT RENTING FROM US

When you sign your guarantee you will be expressly consenting to the use of your personal data for operational management of the guarantee. We may share your personal data with the relevant organisations and individuals set out in column F below. They may also become a data controller in respect of the data. We will continue to be a data controller in respect of the data.

We may share your personal data because we need to in order to supply the service, to comply with the law and to operate our business

efficiently and lawfully. Where the provision of data is a statutory requirement, a contractual requirement or a requirement necessary to enter into a contract, a refusal to provide the data (or a withdrawal of consent relating to the data use) may mean that we are unable to provide you with our service (or that we have to cease providing our service).

By providing an email address and/or telephone number (and any other contact information) you are expressly consenting in advance (by expressly opting in) to receive email notifications and/ or sms text alerts and/or telephone calls and/or Messenger messages and or WhatsApp messages based on this information for specific purpose set out in column D below and from the relevant organisations and individuals set out in column F below.

Our privacy policy allows us to lawfully share your relevant personal data with (for example) the tenant, any of the other joint tenants at the property, other guarantors and other occupiers of the same property or building if this is necessary for the operational management of the guarantee.

We use Acceptacard and/or Worldpay to process cards payments. You provide information directly to Acceptacard and/or Worldpay. We will share personal information with Acceptacard and/or Worldpay only to the extent necessary for the purposes of processing any payments you make and dealing with charge-backs, refunds, complaints and queries relating to such payments. When you make a payment using these services we do NOT receive details from your card, so we will NOT receive the following PAN Number, three digit code or expiry date. We may receive information confirming the card registered address and name.

In the absence of express consent your data may also be lawfully processed because we have a legitimate interest, because we have a contractual relationship with you and/ or because we have a legal duty to process your data.

The most common ways in which your data may be lawfully disclosed when acting as a guarantor for a tenant renting from us is as follows:

WHO	REASONS
Advisors, consultants and other professional experts and banks and other financial organizations	We may disclose your relevant details to our solicitors, accountants, surveyors, insurers and any other professional advisors and bankers/lenders in the course of running our business, we would not disclose to any advisor, consultant, expert or bank/ financial organisation who was not subject to rules themselves about confidentiality in respect of both our and your data. The details disclosed will be limited to the extent necessary for us to obtain the advice we need and to comply with any legal obligations we have.
Tenant, other joint tenants, other guarantors	We may disclose your relevant details to the tenant other joint tenants in respect

and other occupiers of the same property or building.	of the property, other guarantors in respect of the property and other occupiers of the same property or building.
Legal obligations	Where we have a legal right or legal duty to disclose the details we may do so, although unless legally prevented from doing so (eg by a court order) we will normally tell you we are doing this, although we do not undertake to do so if we do not believe it to be appropriate In all cases the details disclosed will be limited to the extent necessary for us to comply with any legal obligations we have.
Housing Act, Deposits and Right To Rent	We are required by law to protect tenancy deposits. These legal obligations may all require us to disclose your relevant details. The details disclosed will be limited to the extent necessary for us to comply with any legal obligations we have.
Legal proceedings (possession/ arrears)	If legal proceeding are necessary this will result in relevant details being disclosed to tracing agents, solicitors and the court service

Information held:

The personal data we hold will include the information listed in column A. It may also include other sensitive data concerning health, if relevant.

The data may be collected and processed by those listed in column B (who is collecting it) and column F (who it may be shared with).

How the data is collected is identified in column C.

Note: We may also collect data from or via third parties such as credit referencing companies and referees such as your employer

How we use your data:

Your personal data will be used for the activities in column D.

Your personal data will be processed during and after your tenancy and any subsequent tenancy arranged through us.

Our lawful basis for processing your data is set out in column E below and comprises a combination of consent, legitimate interest and contract fulfilment

Recipients of personal data:

It will be necessary for us to process or share all or some of your personal data with a range of individuals, businesses and organisations and these may include those listed in column F.

Where is the data stored:

Your personal data is stored in the way described in column G and the data is always stored within the European Union or outside of the European Union but with an organisation operating under the General Data Protection Regulations.

Retention period and criteria used to determine the retention period:

We will retain your personal data for up to the time defined in column H. If the lawful basis for processing your data was consent then you may withdraw consent at any time, but where we had more than one lawful basis for processing, we may still be able to (or be obliged to) retain the data.

A	B	C	D	E	F	G	H
INFO HELD	WHO IS COLLECTING	HOW COLLECTED	WHY COLLECTED	LAWFUL PROCESS	WHO SHARED WITH	HOW STORED	DELETION DATE
Name & Contact Details	Staff (Bond Housing) Bond Application Form(s) Place Group UK	In person Phone Email Text Messenger WhatsApp Online Application	To reference guarantor for suitability as guarantor To contact guarantor Use on Guarantee To use on prescribed information (deposit scheme if guarantor paid deposit)	Consent Legitimate Interest (to ensure guarantor will be able and willing to meet obligations) Contract Fulfilment Legal Obligation	Staff (Bond Housing) Registration App (Bond property management software) Associated Companies Email system for Bond Housing and for Place Group UK Cloud Lettings (agent) Accommodation Marketing (agent) Place Group UK Online Storage Solicitor Accountant Surveyor Insurer Other Advisors Bankers/ Lenders Staff (Bond Housing) Registration App (Bond property management software) Associated Companies	Electronically Paper copies may be printed	Successful applicants 6 years after the tenant leaves and Failed applicants within 1 year of failure or drop out

			To use in legal proceedings (possession/ arrears)		Email system for Bond Housing and for Place Group UK Cloud Lettings (agent) Accommodation Marketing (agent) Place Group UK Online Storage Landlord Deposit Scheme Trace Agent Solicitor Accountant Surveyor Insurer Other Advisors Bankers/ Lenders Court Service Tenant Other Joint Tenants Other Guarantors Other occupiers of the same building		
Employment Details	Staff (Bond Housing) Bond Application Form(s) Place Group UK	In person Phone Email Text Messenger WatsApp Online Application	To reference guarantor for suitability	Consent Legitimate Interest (to ensure guarantor will be able and willing to meet obligations)	Staff (Bond Housing) Registration App (Bond property management software) Associated Companies Email and text system for Bond Housing and for Place Group UK Cloud Lettings (agent) Accommodation Marketing (agent) Place Group UK Online Storage Applicant Employer Landlord Solicitor Accountant Surveyor Insurer Other Advisors Bankers/ Lenders	Electronically Paper copies may be printed	Subject to no tenancy arrears 1 year after the tenant leaves Otherwise within 1 year of the account being settled

Adverse Credit	Staff (Bond Housing) Bond Application Form(s) Place Group UK	In person Phone Email Text Messenger WatsApp Online Application	To reference guarantor for suitability	Consent Legitimate Interest (to ensure guarantor will be able and is willing to meet obligations)	Staff (Bond Housing) Registration App (Bond property management software) Associated Companies Email and text system for Bond Housing and for Place Group UK Cloud Lettings (agent) Accommodation Marketing (agent) Place Group UK Online Storage Landlord Solicitor	Electronically Paper copies may be printed	Subject to no tenancy arrears 1 year after the tenant leaves Otherwise within 1 year of the account being settled
National Insurance Number Passport Details Other ID (eg copy utility bill)	Staff (Bond Housing) Bond Application Form(s) Place Group UK	In person Email Online Application	To reference guarantor for suitability Confirm address Confirm identity To assist with pursuing any arrears	Consent Legitimate Interest (to ensure guarantor will be able and is willing to meet obligations)	Staff (Bond Housing) Staff (Sparkhouse office reception) Associated Companies Email and text system for Bond Housing and for Place Group UK Cloud Lettings (agent) Accommodation Marketing (agent) Place Group UK Online Storage Landlord Solicitor Accountant	Electronically Paper copies may be printed	Subject to no tenancy arrears 1 year after the tenant leaves Otherwise within 1 year of the account being settled
Card Details (PAN Number, three digit code expiry date etc)	Acceptacard / Worldpay	Online or by Phone	To process card payments	Consent Contract Fulfilment	Staff (Bond Housing) do not receive this information (PAN Number, three digit code expiry date etc)	We do not receive this information	We do not receive this information
Card address and name details					Staff (Bond Housing) may receive the card address and name details	Successful applicants 1 year after the tenant leaves and Failed applicants within 1 month of failure or drop out	Successful applicants 1 year after the tenant leaves and Failed applicants within 1 month of failure or drop out

External Landlord Privacy Policy:

SUMMARY OF KEY INFORMATION TO UNDERSTAND WHEN ASKING US TO RENT OR MANAGE YOUR PROPERTY:

When you ask us to rent or manage your property we may share your personal data with the relevant organisations or individuals set out in column F below. They may also become a data controller in respect of the data. We will continue to be a data controller in respect of the data.

We may share your personal data because we need to in order to supply the service, to comply with the law and to operate our business efficiently and lawfully. Where the provision of data is a statutory requirement, a contractual requirement or a requirement necessary to enter into a contract, a refusal to provide the data (or a withdrawal of consent relating to the data use) may mean that we are unable to provide you with our service (or that we have to cease providing our service).

Before providing personal information to us about another person or persons, such as (but not limited to) where there is a joint owner, you must obtain the other person(s) consent to their personal information being disclosed. You must also obtain the other person(s) consent to their personal information being processed in accordance this privacy policy. We are entitled to assume (unless we are advised otherwise in writing) that you have obtained the appropriate consent you require from another person or persons to share information with us in these circumstances.

By providing an email address and/or telephone number (and any other contact information) you are expressly consenting in advance (by expressly opting in) to receive email notifications and/ or sms text alerts and/or telephone calls and/or Messenger messages and or WhatsApp messages based on this information for specific purpose set out in column D below and from the relevant organisations and individuals set out in column F below.

Our privacy policy allows us to lawfully share your relevant personal data with (for example) a tenant, guarantor, maintenance contractor, the local council and utility provider and also HM Government (such as HMRC).

In the absence of express consent your data may also be lawfully processed because we have a legitimate interest, because we have a contractual relationship with you and/ or because we have a legal duty to process your data.

Information held:

The personal data we hold will include the information listed in column A. It may also include other sensitive data concerning health, if relevant.

The data may be collected and processed by those listed in column B (who is collecting it) and column F (who it may be shared with).

How the data is collected is identified in column C.

How we use your data:

Your personal data will be used for the activities in column D.

Our lawful basis for processing your data is set out in column E below and comprises a combination of consent and legitimate interest.

Recipients of personal data:

It will be necessary for us to process or share all or some of your personal data with a range of individuals, businesses and organisations and these may include those listed in column F.

Where is the data stored:

Your personal data is stored in the way described in column G and the data is always stored within the European Union or outside of the European Union but with an organisation operating under the General Data Protection Regulations.

Retention period and criteria used to determine the retention period:

We will retain your personal data for up to the time defined in column H. If the lawful basis for processing your data was consent then you may withdraw consent at any time, but where we had more than one lawful basis for processing, we may still be able to (or be obliged to) retain the data.

A	B	C	D	E	F	G	H
INFO HELD	WHO IS COLLECTING	HOW COLLECTED	WHY COLLECTED	LAWFUL PROCESS	WHO SHARED WITH	HOW STORED	DELETION DATE
Name & Contact Details	Staff (Bond Housing) Bond Application Form(s)		To arrange a valuation	Consent Legitimate Interest	Staff (Bond Housing) Registration App (Bond property management)	Electronically Paper copies may be printed	6 years from the cease of management

	Place Group UK				software) Associated Companies Email system for Bond Housing and for Place Group UK Online Storage		
			To complete the terms of business	Consent Contract fulfilment	Staff (Bond Housing) Registration App (Bond property management software) Associated Companies Email system for Bond Housing and for Place Group UK Online Storage Solicitor Accountant Surveyor Other Advisors		
			To fulfil the property management	Consent Contract fulfilment	Staff (Bond Housing) Registration App (Bond property management software) Associated Companies Email system for Bond Housing and for Place Group UK Online Storage Tenants Guarantor Maintenance Contractors		
			Services	Legitimate Interest	Staff (Bond Housing) Registration App (Bond property management software) Associated Companies Email system for Bond Housing and for Place Group UK Online Storage Local Council Utility Providers		
			To use on prescribed information	Legal Obligation	Staff (Bond Housing) Registration App (Bond		

					property management software) Associated Companies Email system for Bond Housing and for Place Group UK Online Storage Deposit Scheme		
			To use on the tenancy agreement	Contract fulfilment	Staff (Bond Housing) Registration App (Bond property management software) Associated Companies Email system for Bond Housing and for Place Group UK Online Storage Solicitor Accountant Surveyor Other Advisors Tenant Guarantor		
			To use on the guarantor agreement	Contract fulfilment	Staff (Bond Housing) Registration App (Bond property management software) Associated Companies Email system for Bond Housing and for Place Group UK Online Storage Solicitor Accountant Surveyor Other Advisors Guarantor		
			If legal action is needed e.g. possession claim or property sale	Legal Obligation	Staff (Bond Housing) Registration App (Bond property management software) Associated Companies Email system for Bond Housing and for Place Group UK		

					Online Storage Court Service Solicitor Accountant Surveyor Other Advisors		
Bank Details	Staff (Bond Housing) Bond Application Form(s) Place Group UK		To remit rental income	Contract fulfilment	Staff (Bond Housing) Registration App (Bond property management software) Associated Companies Email system for Bond Housing and for Place Group UK Online Storage Bankers	Electronically Paper copies may be printed	6 years from the cease of management
ID	Staff (Bond Housing) Bond Application Form(s) Place Group UK		Confirm identity	Legal Obligation	Staff (Bond Housing) Registration App (Bond property management software) Associated Companies Email system for Bond Housing and for Place Group UK Online Storage	Electronically Paper copies may be printed	6 years from the cease of management
Proof of Address	Staff (Bond Housing) Bond Application Form(s) Place Group UK		Confirm address	Legal Obligation	Staff (Bond Housing) Registration App (Bond property management software) Associated Companies Email system for Bond Housing and for Place Group UK Online Storage	Electronically Paper copies may be printed	6 years from the cease of management
Record of rent received on behalf of and payments made to Landlord	Staff (Bond Housing) Bond Application Form(s) Place Group UK Go Cardless Acceptacard Bankers		Compliance	Legal obligation	Staff (Bond Housing) Registration App (Bond property management software) Associated Companies Email system for Bond Housing and for Place Group UK Online Storage HM Government	Electronically Paper copies may be printed	6 years from the cease of management

Website Privacy Policy:

Our privacy policy sets out how we will treat the personal information of visitors to any of our websites.

By using any of our websites you agree to our privacy policy.

What personal information do we collect via our website(s):

We may collect, store and use the following kinds of personal information from existing, previous and prospective tenants and guarantors (and other web site visitors) using our websites:

1. Information about your computer and about your visits to and use of any of our websites (including your IP address, geographical location, browser type and version, operating system type and version, referral source, length of visit, page views and website navigation paths);
2. Information relating to any transactions carried out between you and us on and/or in relation to any of our websites;
3. Information that you provide to us for the purpose of registering your details with us including (but not limited to) our automated booking systems and our automated payment processing systems;
4. Information that you provide to us for the purpose of using services available from us through any of our websites (and/or other services available from us);
5. Information that you provide to us to enable us to process a request for more information about a property, a request to view a property (including requests submitted through our automated booking systems), an application to rent a property and/or the actual renting of a property from us;
6. Any other information that you choose to provide to us.

How we use your personal information:

Your personal information will be used for the purposes specified in this privacy policy.

This may include using your personal information collected via our website(s) to:

1. Administer our websites;
2. Improve your browsing experience by personalising our websites;
3. Enable your use of the service(s) available on our websites;
4. Supply to you the service(s) arranged via our websites;
5. Communicate with you in connection with a request for more information about a property, a request to view a property (including requests submitted through our automated booking systems), an application to rent a property and/or the actual renting of a property from us;
6. Communicate with you generally in connection with information about properties available to rent from us;
7. Send you general (non-marketing) commercial communications;
8. Send you statements and invoices, and collect payments from you;
9. Deal with enquiries and complaints made by or about you relating to our websites;
10. Provide to third parties statistical information about our users (this information will not be used to identify any individual user).

Disclosing your personal information:

Your personal information may be disclosed for the purposes specified in (and to the relevant organisations and individuals specified in) this privacy policy insofar as is reasonably necessary for the purposes as set out in this privacy policy.

International transfer of your personal information:

Personal information which we collect may be **stored and/or processed** in and/or **transferred** between any of the countries in which we (and/or our suppliers and/or our subcontractors) operate in order to enable us to **use** the personal information in accordance with this privacy policy. Personal information which you provide is always stored within the European Union or outside

of the European Union but with an organisation operating under the General Data Protection Regulations.

Security of your personal information:

We cannot guarantee the security of data sent over the internet however we will take reasonable precautions to prevent the loss, misuse and/or alteration of your personal information and we will store all the personal information you provide to us on secure servers.

Electronic payment transactions and the submission of personal data on registration forms in relation to any of our websites will be encrypted using SSL technology.

Third Party Websites:

Our websites contains links to other websites. We are not responsible for the privacy policies or practices of third party websites.

Cookies and your privacy:

Our websites use cookies. By using any of our websites you consent to our use of cookies as set out in our privacy policy.

What are cookies:

Cookies are small files containing unique identifiers that are sent by web servers to web browsers and which may then be sent back to the web server each time the web browser requests a page from the web server. Cookies can be used by web servers to identify and track users as they navigate different pages on a website and to identify users returning to a website.

Cookies may be either persistent cookies or session cookies. A persistent cookie consists of a text file sent by a web server to a web browser which will be stored by the web browser and will remain valid until its set expiry date (unless deleted by the user before the expiry date). A session cookie will simply expire at the end of the user session when the web browser is closed.

Our cookies:

We use both session cookies and persistent cookies on our websites.

Cookies do not contain any information that personally identifies you, but personal information that we store about you may be linked by us to the information stored in and obtained from cookies.

We may use the information we obtain from our cookies for any of the following purposes:

- 1 To recognise your computer when you visit our websites;
- 2 To track you as you navigate our websites;
- 3 To enable the use of the some of the features on our websites;
- 4 To improve the usability of our websites;
- 5 To analyse the use of our websites;
- 6 To administer our websites;
- 7 To prevent fraud and improve the security of our websites;
- 8 To personalise our websites for you.

Third party cookies:

When you use our websites, you may also be sent third party cookies. We presently use Google Analytics to analyse the use of our websites. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to our websites is used to create reports about the use of the websites. Google will store this information.

Blocking and deleting cookies:

Most browsers allow you to refuse to accept (block) cookies. Blocking cookies will have a negative impact upon the usability of many websites. If you block cookies, you will not be able to use some of the features of our websites.

You can also delete cookies already stored on your computer. Deleting cookies will have a negative impact upon the usability of many websites. If you delete cookies, you will not be able to use some of the features of our websites.



PLACE GROUP

This page sets out how we use and protect information which you give to us when you use this website and throughout your relationship with us.

We are committed to ensuring that your privacy is protected. When we ask you to provide information by which you can be identified, then it will only be used in accordance with our privacy statements. All information will be processed in accordance with the General Data Protection Regulations and the Data Protection Act 2018.

We may update these policies from time to time. You should check this page regularly to ensure that you are happy with any updates.

This policy is effective from 02 January 2019

Place Group UK will lawfully protect and process your personal data in accordance with the General Data Protection Regulations and the Data Protection Act 2018 (“The Act”)

Mr R Hunter t/a Place Group UK is the Data Controller.

The Data Controller can be contacted at:

Data Protection Compliance, Place Group UK, Unit 1 Sparkhouse, Ropewalk Lincoln, LN6 7DQ or by email dataprotection@placegroupuk.co.uk.

The Data Protection Number for the Data Controller is: Z470812X

Mr R Hunter t/a Place Group UK

Please note that Place Homes Lincoln is now a trading style used by Bond Housing Group (Lincoln) Ltd under licence from Place Group UK and that the privacy policy of Bond Housing Group (Lincoln) Ltd applies to Place Homes Lincoln.

The General Data Protection Regulations are to safeguard your personally identifiable information or personal data. This privacy notice will be regularly reviewed and updated.

Your rights:

You have a right of access to check your personal data to verify the lawful basis of processing. We are obliged to respond to an access request within 30 days and may not charge a fee unless the request is unfounded, excessive or repetitive. If a fee is charged it is to be a reasonable fee based upon the administrative cost of providing the information.

You have a right to rectification if the data we hold is either inaccurate or incomplete. If your data has been disclosed to third parties then we must inform them of the rectification, where possible.

You have a right to erasure of your data when consent is our basis of processing (the right to be forgotten). You may request that your personal data be erased, for example, where there is no compelling reason for its continued processing or where you withdraw consent. We will comply with your request unless we have another basis of processing justifying our retaining the data (for example a legal requirement or the defence of a legal claim).

You have some rights to ask us to restrict processing i.e. to block or suppress processing where, for example, the data may be incorrect and whilst the accuracy is verified. We are still permitted to store the data.

You do have a right to object to further processing of your personal data. We may be required to stop processing unless there is some other legitimate basis of processing such as a legitimate interest or a requirement for the exercise or defence of a legal claim.

Where the lawful basis for processing is your consent, you may withdraw consent at any time by writing to: Data Protection Compliance, Place Group UK, Unit 1 Sparkhouse, Ropewalk Lincoln, LN6 7DQ or by email dataprotection@placegroupuk.co.uk.

Where the provision of data is a statutory requirement, a contractual requirement or a requirement necessary to enter into a contract, a refusal to provide the data (or a withdrawal of consent relating to the data use) may mean that we are unable to provide you with our service (or that we have to cease providing our service).

How to lodge a complaint with the supervisory authority:

The supervisory authority responsible for data protection is the Information Commissioners Office (ICO) to whom concerns may be reported by phone on **0303 123 1113** or +44 1625 545 745 if calling from outside the UK or by email using the form on the website ico.org.uk

New Tenant Contact / Viewing Request Privacy Policy:

SUMMARY OF KEY INFORMATION TO UNDERSTAND WHEN REGISTERING WITH US AND REQUESTING TO VIEW PROPERTIES

When you submit a request for more information about a property and/or you submit a request to view a property (including requests submitted through our automated booking systems) and/or you complete a registration form, we may share your personal data with the relevant organisations or individuals set out in column F below. They may also become a data controller in respect of the data. We will continue to be a data controller in respect of the data.

We may share your personal data because we need to in order to supply the service, to comply with the law and to operate our business efficiently and lawfully. Where the provision of data is a statutory requirement, a contractual requirement or a requirement necessary to enter into a contract, a refusal to provide the data (or a withdrawal of consent relating to the data use) may mean that we are unable to provide you with our service (or that we have to cease providing our service).

Before providing personal information to us about another person or persons, such as (but not limited to) where a lead tenant provides details about all the members of a group, you must obtain the other person(s) consent to their personal information being disclosed. You must also

obtain the other person(s) consent to their personal information being processed in accordance this privacy policy. We are entitled to assume (unless we are advised otherwise in writing) that you have obtained the appropriate consent you require from another person or persons to share information with us in these circumstances.

When you request a viewing and/or ask for more information about a property, by providing an email address and/or telephone number (and any other contact information) you are expressly consenting in advance (by expressly opting in) to receive email notifications and/ or sms text alerts and/or telephone calls and/or Messenger messages and or WhatsApp messages based on this information for specific purpose set out in column D below and from the relevant organisations and individuals set out in column F below.

Our privacy policy allows us to lawfully share your relevant personal data with (for example) our letting and managing agents and our viewing clerks.

Your personal information may also be disclosed to the extent specified in Place Group UK's [terms of business](#) Please note that although we reserve the right to do so in our terms, Place Group UK no longer routinely externally credit score tenants or guarantors.

In the absence of express consent your data may also be lawfully processed because we have a legitimate interest in processing your data. A legitimate interest is when we have a business or commercial reason to process your personal data.

Information held:

The personal data we hold will include the information listed in column A. It may also include other sensitive data concerning health, if relevant.

The data may be collected and processed by those listed in column B (who is collecting it) and column F (who it may be shared with).

How the data is collected is identified in column C.

How we use your data:

Your personal data will be used for the activities in column D.

Our lawful basis for processing your data is set out in column E below and comprises a combination of consent and legitimate interest.

Recipients of personal data:

It will be necessary for us to process or share all or some of your personal data with a range of individuals, businesses and organisations and these may include those listed in column F.

Where is the data stored:

Your personal data is stored in the way described in column G and the data is always stored within the European Union or outside of the European Union but with an organisation operating under the General Data Protection Regulations.

Retention period and criteria used to determine the retention period:

We will retain your personal data for up to the time defined in column H. If the lawful basis for processing your data was consent then you may withdraw consent at any time, but where we had more than one lawful basis for processing, we may still be able to (or be obliged to) retain the data.

A	B	C	D	E	F	G	H
INFO HELD	WHO IS COLLECTING	HOW COLLECTED	WHY COLLECTED	LAWFUL PROCESS	WHO SHARED WITH	HOW STORED	DELETION DATE
Name Contact Details and any other information provided through any registration method	Staff (Place Group UK) Place website(s) Place Registration Form(s) Place Actuity Booking Diary Zoopla Right Move Spareroom Accommodation For Students Accommodation Marketing (agent) Bond Housing Group AQL (telecoms)	In person Phone Email Text Messenger WhatsApp Online Registration	To contact tenant applicants about properties and arrange viewings	Consent Legitimate Interest (contact with applicant whilst looking for property)	Staff (Place Group UK) Registration App (Place property management software) Email and text system for Bond Housing and for Place Group UK Accommodation Marketing (agent) Viewing clerks Bond Housing Group Online Storage	Electronically Paper copies may be printed	Electronic 12 months after enquiry Paper 6 months after enquiry

New Tenant Application / On-boarding Privacy Policy:

SUMMARY OF KEY INFORMATION TO UNDERSTAND WHEN APPLYING TO RENT A PROPERTY FROM US

When you apply to rent a property from us we may share your personal data with the relevant organisations or individuals set out in column F below. They may also become a data controller in respect of the data. We will continue to be a data controller in respect of the data.

We may share your personal data because we need to in order to supply the service, to comply with the law and to operate our business efficiently and lawfully. Where the provision of data is a statutory requirement, a contractual requirement or a requirement necessary to enter into a contract, a refusal to provide the data (or a withdrawal of consent relating to the data use) may mean that we are unable to provide you with our service (or that we have to cease providing our service).

Before providing personal information to us about another person or persons, such as (but not limited to) where a lead tenant provides details about all the members of a group, you must obtain the other person(s) consent to their personal information being disclosed. You must also obtain the other person(s) consent to their personal information being processed in accordance this privacy policy. We are entitled to assume (unless we are advised otherwise in writing) that you have obtained the appropriate consent you require from another person or persons to share information with us in these circumstances.

By providing an email address and/or telephone number (and any other contact information) you are expressly consenting in advance (by expressly opting in) to receive email notifications and/ or sms text alerts and/or telephone calls and/or Messenger messages and or WhatsApp messages based on this information for specific purpose set out in column D below and from the relevant organisations and individuals set out in column F below.

Our privacy policy allows us to lawfully share your relevant personal data with (for example) our letting and managing agents, professional advisors and the local council.

We use Acceptacard and/or Worldpay to process cards payments. You provide information directly to Acceptacard and/or Worldpay. We will share personal information with Acceptacard and/or Worldpay only to the extent necessary for the purposes of processing any payments you make and dealing with charge-backs, refunds, complaints and queries relating to such payments. When you make a payment using these services we do NOT receive details from your card, so we will NOT receive the following PAN Number, three digit code or expiry date. We may receive information confirming the card registered address and name.

Your personal information may also be disclosed to the extent specified in Place Group UK's [terms of business](#) Please note that although we reserve the right to do so in our terms, Place Group UK no longer routinely externally credit score tenants or guarantors.

In the absence of express consent your data may also be lawfully processed because we have a legitimate interest, because we have a contractual relationship with you and/ or because we have a legal duty to process your data.

Information held:

The personal data we hold will include the information listed in column A. It may also include other sensitive data concerning health, if relevant.

The data may be collected and processed by those listed in column B (who is collecting it) and column F (who it may be shared with).

How the data is collected is identified in column C.

Note: We may also collect data from or via third parties such as credit referencing companies, referees (previous landlord/current landlord/ employer) and the local council.

How we use your data:

Your personal data will be used for the activities in column D.

Our lawful basis for processing your data is set out in column E below and comprises a combination of consent, legitimate interest, contract fulfilment and legal obligation.

Recipients of personal data:

It will be necessary for us to process or share all or some of your personal data with a range of individuals, businesses and organisations and these may include those listed in column F.

Where is the data stored:

Your personal data is stored in the way described in column G and the data is always stored within the European Union or outside of the European Union but with an organisation operating under the General Data Protection Regulations.

Retention period and criteria used to determine the retention period:

We will retain your personal data for up to the time defined in column H. If the lawful basis for processing your data was consent then you may withdraw consent at any time, but where we had more than one lawful basis for processing, we may still be able to (or be obliged to) retain the data.

A	B	C	D	E	F	G	H
INFO HELD	WHO IS COLLECTING	HOW COLLECTED	WHY COLLECTED	LAWFUL PROCESS	WHO SHARED WITH	HOW STORED	DELETION DATE
Name, Contact Details	Staff (Place Group UK)	In person	Use on application form	Consent	Staff (Place Group UK)	Electronically	Successful applicants 6

<p>and any other information provided through any application method (unless information is separately specified below)</p>	<p>Place Application Form(s) Bond Housing Group</p>	<p>Phone Email Text Messenger WhatsApp Online application form</p>	<p>Use to reference applicant Use to contact applicant</p> <hr/> <p>Use on Tenancy Agreement Use on Guarantee</p>	<p>Legitimate Interest (Contact with applicant and completing the application and referencing applicant)</p> <hr/> <p>Contract Fulfilment</p>	<p>Registration App (Place property management software) Email and text system for Bond Housing and for Place Group UK Accommodation Marketing (agent) Bond Housing Group Online Storage Landlord Solicitor Accountant Surveyor Insurer Other Advisors Bankers/ Lenders</p>	<p>Paper copies may be printed</p>	<p>years after the tenant leaves and Failed applicants within 1 year of failure or drop out</p>
<p>DOB</p>	<p>Staff (Place Group UK) Place Application Form(s) Bond Housing Group</p>	<p>In person Phone Email Text Messenger WhatsApp Online Application</p>	<p>To check applicant is lawfully allowed to sign the Tenancy Agreement to rent the property (age 18+)</p>	<p>Contract Fulfilment</p>	<p>Staff (Place Group UK) Registration App (Place property management software) Email and text system for Bond Housing and for Place Group UK Accommodation Marketing (agent) Bond Housing Group Online Storage Landlord Solicitor Accountant Surveyor Insurer Other Advisors Bankers/ Lenders</p>	<p>Electronically Paper copies may be printed</p>	<p>Successful applicants 6 years after the tenant leaves and Failed applicants within 1 year of failure or drop out</p>
<p>University Details</p>	<p>Staff (Place Group UK) Place Application Form(s) Bond Housing Group</p>	<p>In person Phone Email Text Messenger WhatsApp Online Application</p>	<p>To check student status for council tax exemption</p>	<p>Legitimate Interest (to ensure obligations to local council are met and that any exemption can be applied for)</p>	<p>Staff (Place Group UK) Registration App (Place property management software) Email and text system for Bond Housing and for Place Group UK Accommodation Marketing (agent) Bond Housing Group Online Storage</p>	<p>Electronically Paper copies may be printed</p>	<p>Successful applicants 6 years after the tenant leaves and Failed applicants within 1 year of failure or drop out</p>

					<p>Landlord Solicitor Accountant Surveyor Insurer Other Advisors Bankers/ Lenders Local Council</p>		
<p>Employment details</p>	<p>Staff (Place Group UK) Place Application Form(s) Bond Housing Group</p>	<p>In person Phone Email Text Messenger WatsApp Online Application</p>	<p>To reference applicant for suitability as tenant</p>	<p>Legitimate Interest (to ensure applicant will be able to meet tenancy obligations)</p>	<p>Staff (Place Group UK) Registration App (Place property management software) Email and text system for Bond Housing and for Place Group UK Accommodation Marketing (agent) Bond Housing Group Online Storage Applicant Employer Landlord Solicitor Accountant Surveyor Insurer Other Advisors Bankers/ Lenders</p>	<p>Electronically Paper copies may be printed</p>	<p>Successful applicants 1 year after the tenant leaves and Failed applicants within 1 month of failure or drop out</p>
<p>Previous and current landlord/ agent details</p>					<p>Staff (Place Group UK) Registration App (Place property management software) Email and text system for Bond Housing and for Place Group UK Accommodation Marketing (agent) Bond Housing Group Online Storage Previous Landlord Current Landlord Landlord Solicitor</p>		

Adverse Credit					<p>Staff (Place Group UK) Registration App (Place property management software) Email and text system for Bond Housing and for Place Group UK Accommodation Marketing (agent) Bond Housing Group Online Storage Landlord Solicitor</p>		
<p>National Insurance Number Passport Details Other ID (eg copy utility bill)</p>	<p>Staff (Place Group UK) Bond Housing Group</p>	<p>In person Email Online Application</p>	<p>To reference applicant for suitability as tenant Confirm address Confirm identity To assist with pursuing any arrears</p> <hr/> <p>Right To Rent</p>	<p>Consent Legitimate Interest (to ensure applicant will be able to meet tenancy obligations)</p> <hr/> <p>Legal Obligation</p>	<p>Staff (Place Group UK) Registration App (Place property management software) Email and text system for Bond Housing and for Place Group UK Accommodation Marketing (agent) Bond Housing Group Online Storage Landlord Solicitor Accountant HM Government</p>	<p>Electronically Paper copies may be printed</p>	<p>Successful applicants 1 year after the tenant leaves and Failed applicants within 1 month of failure or drop out</p>
Bank Details	<p>Staff (Place Group UK) Bankers Go Cardless Bond Housing Group</p>	<p>In person Email Self Registration</p>	<p>To ensure applicant has set up payment arrangements To be able to make refunds</p>	<p>Legitimate Interest (to ensure applicant will be able to meet tenancy obligations) Contract Fulfilment</p>	<p>Staff (Place Group UK) Registration App (Place property management software) Email and text system for Bond Housing and for Place Group UK Accommodation Marketing (agent) Bond Housing Group Online Storage Landlord Solicitor Accountant Bankers Go Cardless</p>	<p>Electronically Paper copies may be printed</p>	<p>Successful applicants 1 year after the tenant leaves and Failed applicants within 1 month of failure or drop out</p>

Next of Kin	Staff (Place Group UK) Place Application Form(s) Bond Housing Group	In person Phone Email Text Messenger WhatsApp Online Application	Emergency Contact To assist with pursuing any arrears	Legitimate Interest (to be able to contact NOK in an emergency and Legitimate Interest (to ensure applicant will be able to meet tenancy obligations)	Staff (Place Group UK) Registration App (Place property management software) Email and text system for Bond Housing and for Place Group UK Accommodation Marketing (agent) Bond Housing Group Online Storage Landlord Solicitor	Electronically Paper copies may be printed	Successful applicants 1 year after the tenant leaves and Failed applicants within 1 month of failure or drop out
Guarantor Name, Contact Details and any other information provided through any application method	Staff (Place Group UK) Place Application Form(s) Bond Housing Group	In person Phone Email Text Messenger WhatsApp Online Application	To reference guarantor for suitability as guarantor To contact guarantor <hr/> Use on Guarantee	Legitimate Interest (to ensure guarantor will be able and willing to meet obligations) <hr/> Contract Fulfilment	Staff (Place Group UK) Registration App (Place property management software) Email and text system for Bond Housing and for Place Group UK Accommodation Marketing (agent) Bond Housing Group Online Storage Landlord Solicitor	Electronically Paper copies may be printed	Successful applicants 6 years after the tenant leaves and Failed applicants within 1 year of failure or drop out
Card Details (PAN Number, three digit code expiry date etc) <hr/> Card address and name Details	Acceptacard / Worldpay	Online or by Phone	To process card payments	Consent Contract Fulfilment	Staff (Place Group UK) do not receive this information (PAN Number, three digit code expiry date etc) <hr/> Staff (Place Group UK) may receive the card address and name details	We do not receive this information <hr/> Successful applicants 1 year after the tenant leaves and Failed applicants within 1 month of failure or drop out	We do not receive this information <hr/> Successful applicants 1 year after the tenant leaves and Failed applicants within 1 month of failure or drop out

Current Tenant Occupiers Privacy Policy:

SUMMARY OF KEY INFORMATION TO UNDERSTAND WHEN RENTING A PROPERTY FROM US

When you sign your tenancy agreement you will be expressly consenting to the use of your personal data for the day to day management of the property and the conduct of the landlord tenant relationship. We may share your personal data with the relevant organisations or individuals set out in column F below. They may also become a data controller in respect of the data. We will continue to be a data controller in respect of the data.

We may share your personal data because we need to in order to supply the service, to comply with the law and to operate our business efficiently and lawfully. Where the provision of data is a statutory requirement, a contractual requirement or a requirement necessary to enter into a contract, a refusal to provide the data (or a withdrawal of consent relating to the data use) may mean that we are unable to provide you with our service (or that we have to cease providing our service).

By providing an email address and/or telephone number (and any other contact information) you are expressly consenting in advance (by expressly opting in) to receive email notifications and/ or sms text alerts and/or telephone calls and/or Messenger messages and or WhatsApp messages based on this information for specific purpose set out in column D below and from the relevant organisations and individuals set out in column F below.

Our privacy policy allows us to lawfully share your relevant personal data with (for example) our maintenance contractors, our managing agents, our professional advisors, the local council and utility companies. We may also lawfully share your relevant personal data (which can include tenancy conduct information) with a prospective landlord, a prospective agent or a prospective mortgagor (lender) as well as joint tenants, guarantors and other occupiers.

We use Acceptacard and/or Worldpay to process cards payments. You provide information directly to Acceptacard and/or Worldpay. We will share personal information with Acceptacard and/or Worldpay only to the extent necessary for the purposes of processing any payments you make and dealing with charge-backs, refunds, complaints and queries relating to such payments. When you make a payment using these services we do NOT receive details from your card, so we will NOT receive the following PAN Number, three digit code or expiry date. We may receive information confirming the card registered address and name.

Your personal information may also be disclosed to the extent specified in Place Group UK's [terms of business](#) Please note that although we reserve the right to do so in our terms, Place Group UK no longer routinely externally credit score tenants or guarantors.

In the absence of express consent your data may also be lawfully processed because we have a legitimate interest, because we have a contractual relationship with you and/ or because we have a legal duty to process your data.

We will retain all tenancy agreements for 10 years as we have a legitimate interest in doing so because we may be asked by the council to prove the historical use (and continued use) of a building for planning purposes.

The most common ways in which your data may be lawfully disclosed when renting from us is as follows:

WHO	REASONS
Advisors, consultants and other professional experts and banks and other financial organizations	We may disclose your relevant details to our solicitors, accountants, surveyors, insurers and any other professional advisors and bankers/lenders in the course of running our business, we would not disclose to any advisor, consultant, expert or bank/ financial organisation who was not subject to rules themselves about confidentiality in respect of both our and your data. The details disclosed will be limited to the extent necessary for us to obtain the advice we need and to comply with any legal obligations we have.
Other joint tenants, guarantors and other occupiers of the same property or building.	We may disclose your relevant details to the tenant other joint tenants in respect of the property, guarantors in respect of the property and other occupiers of the same property or building We may also disclose relevant details to a contractor, for them to complete a repair job at a property. The details disclosed will be limited to the extent necessary for them to undertake this work, and may involve providing your contact details for them to contact you to arrange the time of a repair.
Local and Central Government	We may disclose your details to Local and/or Central Government,, For example we may disclose your details to Local Government concerning any Council Tax, Housing Act or HMO Licensing matters and to Central Government or HMRC concerning our income and other tax matters. We also be asked by other government agencies such as benefits agency to confirm your address and dates of residency at our addresses as part of their own fraud audit . Sometimes requests from government agencies are made a considerable time after you have vacated. The details disclosed will be limited to the extent necessary for us to comply with any legal obligations we have.
Police Forces	We may disclose your relevant details to the police or other law enforcement agencies if we are asked to or if we are satisfied that you may be involved in any form of criminal activity in particular but not limited to terrorism, dealing in drugs or fraud at our property. The details disclosed will be limited to the extent necessary for us to comply with any legal obligations we have.

Legal obligations	Where we have a legal right or legal duty to disclose the details we may do so, although unless legally prevented from doing so (eg by a court order) we will normally tell you we are doing this, although we do not undertake to do so if we do not believe it to be appropriate In all cases the details disclosed will be limited to the extent necessary for us to comply with any legal obligations we have.
References	Where you have asked us to write a reference for you, you have consented for us to disclose details. We reserve the right to decline to provide a reference if you will not agree the terms and wording of the reference in advance. If we provide a reference on your behalf you will not be able to complain if we accurately disclose arrears or poor conduct.
Housing Act, Deposits and Right To Rent	We are required by law to protect tenancy deposits, to undertake right to rent checks and to licence certain multiple occupied properties. These legal obligations may all require us to disclose your relevant details. The details disclosed will be limited to the extent necessary for us to comply with any legal obligations we have.
Legal proceedings (possession/ arrears)	If legal proceedings are necessary this will result in relevant details being disclosed to tracing agents, solicitors and the court service

Information held:

The personal data we hold will include the information listed in column A. It may also include other sensitive data concerning health, if relevant.

The data may be collected and processed by those listed in column B (who is collecting it) and column F (who it may be shared with).

How the data is collected is identified in column C.

Note: We may also collect data from or via third parties such as credit referencing companies, referees (previous landlord/ current landlord/ employer) and the local council.

How we use your data:

Your personal data will be used for the activities in column D.

Your personal data will be processed during and after your tenancy and any subsequent tenancy arranged through us.

Our lawful basis for processing your data is set out in column E below and comprises a combination of consent, legitimate interest, contract fulfilment and legal obligation.

Recipients of personal data:

It will be necessary for us to process or share all or some of your personal data with a range of individuals, businesses and organisations and these may include those listed in column F.

Where is the data stored:

Your personal data is stored in the way described in column G and the data is always stored within the European Union or outside of the European Union but with an organisation operating under the General Data Protection Regulations.

Retention period and criteria used to determine the retention period:

We will retain your personal data for up to the time defined in column H. If the lawful basis for processing your data was consent then you may withdraw consent at any time, but where we had more than one lawful basis for processing, we may still be able to (or be obliged to) retain the data.

A	B	C	D	E	F	G	H
INFO HELD	WHO IS COLLECTING	HOW COLLECTED	WHY COLLECTED	LAWFUL PROCESS	WHO SHARED WITH	HOW STORED	DELETION DATE
Name and Contact Details	Staff (Place Group UK) Place Application Form(s) Bond Housing Group	In person Phone Email Text Messenger WhatsApp Online application form	To create Tenancy Agreement To contact the tenant for property management To operate our business lawfully and efficiently To account for our taxes properly	Consent Contract Fulfilment Legitimate Interest	Staff (Place Group UK) Registration App (Place property management software) Email and text system for Bond Housing and for Place Group UK Accommodation Marketing (agent) Bond Housing Group Online Storage Landlord Local Council Solicitor Accountant Surveyor	Electronically Paper copies may be printed	6 years after the tenant leaves

			<p>To use on prescribed information (deposit scheme)</p> <p>To use in legal proceedings (possession/ arrears)</p> <p>To use on HMO licence applications</p>	<p>Legal Obligation</p>	<p>Insurer</p> <p>Other Advisors</p> <p>Bankers/ Lenders</p> <p>Maintenance Contractors</p> <p>HM Government</p> <p>Police</p>		
			<p>To notify utility companies/ local council</p>	<p>Legitimate Interest (to facilitate to transfer of the utility services/ council tax on tenancy change over)</p>	<p>Staff (Place Group UK)</p> <p>Registration App (Place property management software)</p> <p>Email and text system for Bond Housing and for Place Group UK Accommodation Marketing (agent)</p> <p>Bond Housing Group</p> <p>Online Storage</p> <p>Landlord</p> <p>Deposit Scheme</p> <p>Trace Agent</p> <p>Solicitor</p> <p>Accountant</p> <p>Surveyor</p> <p>Insurer</p> <p>Other Advisors</p> <p>Bankers/ Lenders</p> <p>Court Service</p> <p>Local Council</p> <p>HM Government</p>		
					<p>Staff (Place Group UK)</p> <p>Registration App (Place property management software)</p> <p>Email and text system for Bond Housing and for Place Group UK Accommodation Marketing (agent)</p> <p>Bond Housing Group</p> <p>Online Storage</p> <p>Landlord</p> <p>Utility Companies</p>		

					Local Council		
University Details	Staff (Place Group UK) Place Application Form(s) Bond Housing Group	In person Phone Email Text Messenger WatsApp Online Application	To check student status for council tax exemption	Legitimate Interest (to ensure obligations to local council are met and that any exemption can be applied for)	Staff (Place Group UK) Registration App (Place property management software) Email and text system for Bond Housing and for Place Group UK Accommodation Marketing (agent) Bond Housing Group Online Storage Landlord Solicitor Accountant Surveyor Insurer Other Advisors Bankers/ Lenders Local Council	Electronically Paper copies may be printed	6 years after the tenant leaves
			To notify student status for council tax exemption	Legal Obligation	Local Council		
Employment details	Staff (Place Group UK) Place Application Form(s) Bond Housing Group	In person Phone Email Text Messenger WatsApp Online Application	To reference applicant for suitability as tenant	Legitimate Interest (to ensure applicant will be able to meet tenancy obligations)	Staff (Place Group UK) Registration App (Place property management software) Email and text system for Bond Housing and for Place Group UK Accommodation Marketing (agent) Bond Housing Group Online Storage Applicant Employer Landlord Solicitor Accountant Surveyor Insurer Other Advisors Bankers/ Lenders	Electronically Paper copies may be printed	Subject to no tenancy arrears 1 year after the tenant leaves Otherwise within 1 year of the account being settled

<p>Previous and current landlord/ agent details</p> <p>Adverse Credit</p>					<p>Staff (Place Group UK) Registration App (Place property management software) Email and text system for Bond Housing and for Place Group UK Accommodation Marketing (agent) Bond Housing Group Online Storage Previous Landlord Current Landlord Landlord Solicitor</p> <p>Staff (Place Group UK) Registration App (Place property management software) Email and text system for Bond Housing and for Place Group UK Accommodation Marketing (agent) Bond Housing Group Online Storage Landlord Solicitor</p>		
<p>National Insurance Number Passport Details Other ID (eg copy utility bill)</p>	<p>Staff (Place Group UK) Place Application Form(s) Bond Housing Group</p>	<p>In person Email Online Application</p>	<p>To reference applicant for suitability as tenant Confirm address Confirm identity To assist with pursuing any arrears</p> <hr/> <p>Right To Rent</p>	<p>Consent Legitimate Interest (to ensure applicant will be able to meet tenancy obligations)</p> <hr/> <p>Legal Obligation</p>	<p>Staff (Place Group UK) Registration App (Place property management software) Email and text system for Bond Housing and for Place Group UK Accommodation Marketing (agent) Bond Housing Group Online Storage Landlord Solicitor Accountant HM Government</p>	<p>Electronically Paper copies may be printed</p>	<p>Subject to no tenancy arrears 1 year after the tenant leaves Otherwise within 1 year of the account being settled</p>
<p>Bank Details</p>	<p>Staff (Place Group UK)</p>	<p>In person</p>	<p>To ensure applicant has</p>	<p>Legitimate Interest (to</p>	<p>Staff (Place Group UK)</p>	<p>Electronically</p>	<p>Subject to no tenancy</p>

	Bankers Go Cardless Bond Housing Group	Email Self Registration	set up payment arrangements To be able to make refunds	ensure applicant will be able to meet tenancy obligations) Contract Fulfilment	Registration App (Place property management software) Email and text system for Bond Housing and for Place Group UK Accommodation Marketing (agent) Bond Housing Group Online Storage Landlord Solicitor Accountant Bankers Go Cardless	Paper copies may be printed	arrears 1 year after the tenant leaves Otherwise within 1 year of the account being settled
Next of Kin	Staff (Place Group UK) Place Application Form(s) Bond Housing Group	In person Phone Email Text Messenger WhatsApp Online Application	Emergency Contact To assist with pursuing any arrears	Legitimate Interest (to be able to contact NOK in an emergency and Legitimate Interest (to ensure applicant will be able to meet tenancy obligations)	Staff (Place Group UK) Registration App (Place property management software) Email and text system for Bond Housing and for Place Group UK Accommodation Marketing (agent) Bond Housing Group Online Storage Landlord Solicitor	Electronically Paper copies may be printed	Subject to no tenancy arrears 1 year after the tenant leaves Otherwise within 1 year of the account being settled
Guarantor Name, Contact Details and any other information provided through any application method	Staff (Place Group UK) Place Application Form(s) Bond Housing Group	In person Phone Email Text Messenger WhatsApp Online Application	To reference guarantor for suitability as guarantor To contact guarantor <hr/> Use on Guarantee	Legitimate Interest (to ensure guarantor will be able and willing to meet obligations) <hr/> Contract Fulfilment	Staff (Place Group UK) Registration App (Place property management software) Email and text system for Bond Housing and for Place Group UK Accommodation Marketing (agent) Bond Housing Group Online Storage Landlord Solicitor	Electronically Paper copies may be printed	6 years after the tenant leaves
Tenancy conduct information	Staff (Place Group UK) Place Application Form(s) Bond Housing Group	In person In person Phone Email	To ensure effective property management To fulfil our role as HMO manager	Legitimate Interest Legal Obligation	Staff (Place Group UK) Registration App (Place property management software)	Electronically Paper copies may be printed	6 years after the tenant leaves

		Text Messenger WhatsApp	To report criminal activity <hr/> To supply references (on tenants request)	Consent	Email and text system for Bond Housing and for Place Group UK Accommodation Marketing (agent) Bond Housing Group Online Storage Landlord Deposit Scheme Trace Agent Solicitor Accountant Surveyor Insurer Other Advisors Bankers/ Lenders Court Service Local Council Other Joint Tenants Guarantors Other occupiers of the same building Prospective Landlord Prospective Agent Prospective Mortgagor Police		
Tenancy Agreements	Staff (Place Group UK)	Filed Tenancy Agreements	To answer planning enquiries	Legitimate interest	Local Council Planning Inspectorate	Electronically Paper copies may be printed	10 years after the tenant leaves
Card Details (PAN Number, three digit code expiry date etc) <hr/> Card address and name details	Acceptacard / Worldpay	Online or by Phone	To process card payments	Consent Contract Fulfilment	Staff (Place Group UK) do not receive this information (PAN Number, three digit code expiry date etc) <hr/> Staff (Place Group UK) may receive the card address and name details	We do not receive this information <hr/> Successful applicants 1 year after the tenant leaves and Failed applicants within 1 month of failure or drop out	We do not receive this information <hr/> Successful applicants 1 year after the tenant leaves and Failed applicants within 1 month of failure or drop out

Guarantors Privacy Policy:

SUMMARY OF KEY INFORMATION TO UNDERSTAND WHEN ACTING AS GUARANTOR FOR A TENANT RENTING FROM US

When you sign your guarantee you will be expressly consenting to the use of your personal data for operational management of the guarantee. We may share your personal data with the relevant organisations and individuals set out in column F below. They may also become a data controller in respect of the data. We will continue to be a data controller in respect of the data.

We may share your personal data because we need to in order to supply the service, to comply with the law and to operate our business efficiently and lawfully. Where the provision of data is a statutory requirement, a contractual requirement or a requirement necessary to enter into a contract, a refusal to provide the data (or a withdrawal of consent relating to the data use) may mean that we are unable to provide you with our service (or that we have to cease providing our service).

By providing an email address and/or telephone number (and any other contact information) you are expressly consenting in advance (by expressly opting in) to receive email notifications and/ or sms text alerts and/or telephone calls and/or Messenger messages and or WhatsApp messages based on this information for specific purpose set out in column D below and from the relevant organisations and individuals set out in column F below.

Our privacy policy allows us to lawfully share your relevant personal data with (for example) the tenant, any of the other joint tenants at the property, other guarantors and other occupiers of the same property or building if this is necessary for the operational management of the guarantee.

We use Acceptacard and/or Worldpay to process cards payments. You provide information directly to Acceptacard and/or Worldpay. We will share personal information with Acceptacard and/or Worldpay only to the extent necessary for the purposes of processing any payments you make and dealing with charge-backs, refunds, complaints and queries relating to such payments. When you make a payment using these services we do NOT receive details from your card, so we will NOT receive the following PAN Number, three digit code or expiry date. We may receive information confirming the card registered address and name.

Your personal information may also be disclosed to the extent specified in Place Group UK's [terms of business](#) Please note that although we reserve the right to do so in our terms, Place Group UK no longer routinely externally credit score tenants or guarantors.

In the absence of express consent your data may also be lawfully processed because we have a legitimate interest, because we have a contractual relationship with you and/ or because we have a legal duty to process your data.

The most common ways in which your data may be lawfully disclosed when acting as a guarantor for a tenant renting from us is as follows:

WHO	REASONS
Advisors, consultants and other professional experts and banks and other financial organizations	We may disclose your relevant details to our solicitors, accountants, surveyors, insurers and any other professional advisors and bankers/lenders in the course of running our business, we would not disclose to any advisor, consultant, expert or bank/ financial organisation who was not subject to rules themselves about confidentiality in respect of both our and your data. The details disclosed will be limited to the extent necessary for us to obtain the advice we need and to comply with any legal obligations we have.
Tenant, other joint tenants, other guarantors and other occupiers of the same property or building.	We may disclose your relevant details to the tenant other joint tenants in respect of the property, other guarantors in respect of the property and other occupiers of the same property or building.
Legal obligations	Where we have a legal right or legal duty to disclose the details we may do so, although unless legally prevented from doing so (eg by a court order) we will normally tell you we are doing this, although we do not undertake to do so if we do not believe it to be appropriate In all cases the details disclosed will be limited to the extent necessary for us to comply with any legal obligations we have.
Housing Act, Deposits and Right To Rent	We are required by law to protect tenancy deposits. These legal obligations may all require us to disclose your relevant details. The details disclosed will be limited to the extent necessary for us to comply with any legal obligations we have.
Legal proceedings (possession/ arrears)	If legal proceeding are necessary this will result in relevant details being disclosed to tracing agents, solicitors and the court service

Information held:

The personal data we hold will include the information listed in column A. It may also include other sensitive data concerning health, if relevant.

The data may be collected and processed by those listed in column B (who is collecting it) and column F (who it may be shared with).

How the data is collected is identified in column C.

Note: We may also collect data from or via third parties such as credit referencing companies and referees such as your employer

How we use your data:

Your personal data will be used for the activities in column D.

Your personal data will be processed during and after your tenancy and any subsequent tenancy arranged through us.

Our lawful basis for processing your data is set out in column E below and comprises a combination of consent, legitimate interest and contract fulfilment

Recipients of personal data:

It will be necessary for us to process or share all or some of your personal data with a range of individuals, businesses and organisations and these may include those listed in column F.

Where is the data stored:

Your personal data is stored in the way described in column G and the data is always stored within the European Union or outside of the European Union but with an organisation operating under the General Data Protection Regulations.

Retention period and criteria used to determine the retention period:

We will retain your personal data for up to the time defined in column H. If the lawful basis for processing your data was consent then you may withdraw consent at any time, but where we had more than one lawful basis for processing, we may still be able to (or be obliged to) retain the data.

A	B	C	D	E	F	G	H
INFO HELD	WHO IS COLLECTING	HOW COLLECTED	WHY COLLECTED	LAWFUL PROCESS	WHO SHARED WITH	HOW STORED	DELETION DATE
Name & Contact Details	Staff (Place Group UK) Place Application Form(s) Bond Housing Group	In person Phone Email Text Messenger WhatsApp Online Application	To reference guarantor for suitability as guarantor To contact guarantor Use on Guarantee	Consent Legitimate Interest (to ensure guarantor will be able and willing to meet obligations) Contract Fulfilment	Staff (Place Group UK) Registration App (Place property management software) Email and text system for Bond Housing and for Place Group UK Accommodation Marketing (agent) Bond Housing Group	Electronically Paper copies may be printed	Successful applicants 6 years after the tenant leaves and Failed applicants within 1 year of failure or drop out

			<p>To use on prescribed information (deposit scheme if guarantor paid deposit)</p> <p>To use in legal proceedings (possession/ arrears)</p>	<p>Legal Obligation</p>	<p>Online Storage Solicitor Accountant Surveyor Insurer Other Advisors Bankers/ Lenders</p> <hr/> <p>Staff (Place Group UK) Registration App (Place property management software) Email and text system for Bond Housing and for Place Group UK Accommodation Marketing (agent) Bond Housing Group Online Storage Landlord Deposit Scheme Trace Agent Solicitor Accountant Surveyor Insurer Other Advisors Bankers/ Lenders Court Service Tenant Other Joint Tenants Other Guarantors Other occupiers of the same building</p>		
Employment Details	Staff (Place Group UK) Place Application Form(s) Bond Housing Group	In person Phone Email Text Messenger WhatsApp Online Application	To reference guarantor for suitability	Consent Legitimate Interest (to ensure guarantor will be able and willing to meet obligations)	Staff (Place Group UK) Registration App (Place property management software) Email and text system for Bond Housing and for Place Group UK Accommodation	Electronically Paper copies may be printed	Subject to no tenancy arrears 1 year after the tenant leaves Otherwise within 1 year of the account being settled

					Marketing (agent) Bond Housing Group Online Storage Applicant Employer Landlord Solicitor Accountant Surveyor Insurer Other Advisors Bankers/ Lenders		
Adverse Credit	Staff (Place Group UK) Place Application Form(s) Bond Housing Group	In person Phone Email Text Messenger WhatsApp Online Application	To reference guarantor for suitability	Consent Legitimate Interest (to ensure guarantor will be able and is willing to meet obligations)	Staff (Place Group UK) Registration App (Place property management software) Email and text system for Bond Housing and for Place Group UK Accommodation Marketing (agent) Bond Housing Group Online Storage Landlord Solicitor	Electronically Paper copies may be printed	Subject to no tenancy arrears 1 year after the tenant leaves Otherwise within 1 year of the account being settled
National Insurance Number Passport Details Other ID (eg copy utility bill)	Staff (Place Group UK) Place Application Form(s) Bond Housing Group	In person Email Online Application	To reference guarantor for suitability Confirm address Confirm identity To assist with pursuing any arrears	Consent Legitimate Interest (to ensure guarantor will be able and is willing to meet obligations)	Staff (Place Group UK) Registration App (Place property management software) Email and text system for Bond Housing and for Place Group UK Accommodation Marketing (agent) Bond Housing Group Online Storage Landlord Solicitor Accountant	Electronically Paper copies may be printed	Subject to no tenancy arrears 1 year after the tenant leaves Otherwise within 1 year of the account being settled
Card Details (PAN Number, three digit code expiry date etc)	Acceptacard / Worldpay	Online or by Phone	To process card payments	Consent Contract Fulfilment	Staff (Place Group UK) do not receive this information (PAN Number, three digit code expiry date etc)	We do not receive this information	We do not receive this information

Card address and name details					Staff (Place Group UK) may receive the card address and name details	Successful applicants 1 year after the tenant leaves and Failed applicants within 1 month of failure or drop out	Successful applicants 1 year after the tenant leaves and Failed applicants within 1 month of failure or drop out
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Website Privacy Policy:

Our privacy policy sets out how we will treat the personal information of visitors to any of our websites.

By using any of our websites you agree to our privacy policy.

What personal information do we collect via our website(s):

We may collect, store and use the following kinds of personal information from existing, previous and prospective tenants and guarantors (and other web site visitors) using our websites:

1. Information about your computer and about your visits to and use of any of our websites (including your IP address, geographical location, browser type and version, operating system type and version, referral source, length of visit, page views and website navigation paths);
2. Information relating to any transactions carried out between you and us on and/or in relation to any of our websites;
3. Information that you provide to us for the purpose of registering your details with us including (but not limited to) our automated booking systems and our automated payment processing systems;
4. Information that you provide to us for the purpose of using services available from us through any of our websites (and/or other services available from us);

5. Information that you provide to us to enable us to process a request for more information about a property, a request to view a property (including requests submitted through our automated booking systems), an application to rent a property and/or the actual renting of a property from us;

6. Any other information that you choose to provide to us.

How we use your personal information:

Your personal information will be used for the purposes specified in this privacy policy.

This may include using your personal information collected via our website(s) to:

1. Administer our websites;

2. Improve your browsing experience by personalising our websites;

3. Enable your use of the service(s) available on our websites;

4. Supply to you the service(s) arranged via our websites;

5. Communicate with you in connection with a request for more information about a property, a request to view a property (including requests submitted through our automated booking systems), an application to rent a property and/or the actual renting of a property from us;

6. Communicate with you generally in connection with information about properties available to rent from us;

7. Send you general (non-marketing) commercial communications;

8. Send you statements and invoices, and collect payments from you;

9. Deal with enquiries and complaints made by or about you relating to our websites;

10. Provide to third parties statistical information about our users (this information will not be used to identify any individual user).

Disclosing your personal information:

Your personal information may be disclosed for the purposes specified in (and to the relevant organisations and individuals specified in) this privacy policy insofar as is reasonably necessary for the purposes as set out in this privacy policy.

International transfer of your personal information:

Personal information which we collect may be **stored and/or processed** in and/or **transferred** between any of the countries in which we (and/or our suppliers and/or our subcontractors) operate in order to enable us to **use** the personal information in accordance with this privacy policy. Personal information which you provide is always stored within the European Union or outside of the European Union but with an organisation operating under the General Data Protection Regulations.

Security of your personal information:

We cannot guarantee the security of data sent over the internet however we will take reasonable precautions to prevent the loss, misuse and/or alteration of your personal information and we will store all the personal information you provide to us on secure servers.

Electronic payment transactions and the submission of personal data on registration forms in relation to any of our websites will be encrypted using SSL technology.

Third Party Websites:

Our websites contains links to other websites. We are not responsible for the privacy policies or practices of third party websites.

Cookies and your privacy:

Our websites use cookies. By using any of our websites you consent to our use of cookies as set out in our privacy policy.

What are cookies:

Cookies are small files containing unique identifiers that are sent by web servers to web browsers and which may then be sent back to the web server each time the web browser requests a page from the web server. Cookies can be used by web servers to identify and track users as they navigate different pages on a website and to identify users returning to a website.

Cookies may be either persistent cookies or session cookies. A persistent cookie consists of a text file sent by a web server to a web browser which will be stored by the web browser and will remain valid until its set expiry date (unless deleted by the user

before the expiry date). A session cookie will simply expire at the end of the user session when the web browser is closed.

Our cookies:

We use both session cookies and persistent cookies on our websites.

Cookies do not contain any information that personally identifies you, but personal information that we store about you may be linked by us to the information stored in and obtained from cookies.

We may use the information we obtain from our cookies for any of the following purposes:

- 1 To recognise your computer when you visit our websites;
- 2 To track you as you navigate our websites;
- 3 To enable the use of the some of the features on our websites;
- 4 To improve the usability of our websites;
- 5 To analyse the use of our websites;
- 6 To administer our websites;
- 7 To prevent fraud and improve the security of our websites;
- 8 To personalise our websites for you.

Third party cookies:

When you use our websites, you may also be sent third party cookies. We presently use Google Analytics to analyse the use of our websites. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to our websites is used to create reports about the use of the websites. Google will store this information.

Blocking and deleting cookies:

Most browsers allow you to refuse to accept (block) cookies. Blocking cookies will have a negative impact upon the usability of many websites. If you block cookies, you will not be able to use some of the features of our websites.

You can also delete cookies already stored on your computer. Deleting cookies will have a negative impact upon the usability of many websites. If you delete cookies, you will not be able to use some of the features of our websites.

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