

PRIVACY POLICY

General Data Protection Regulation (GDPR)

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Review Date: May 2019

This Policy is in line with the USW Student Union and University of South Wales Policies whilst the Glamorgan Student Letting (GSL) Office is based on site.

Introduction

Preservation of your privacy is important to Glamorgan Student Letting Ltd (“Glamorgan Student Letting”, “GSL”, “we”, “us” or “our”) and we are committed to letting you know how we use your personal information during the advertising, letting, management and tenancy processes and to making only responsible use of your data. We aim to be clear when we collect your data and not do anything you would not reasonably expect.

Glamorgan Student Letting recognises the General Data Protection Regulations as the primary statutory responsibilities relating to data handling and processing.

This privacy notice tells you what to expect when Glamorgan Student Letting collects personal information. It applies to information we collect about:

- Our Tenants, Landlords and Contractors
- Users of our websites
- People who use our services
- People who give us feedback, make suggestions, complete questionnaires, polls or make complaints
- Suppliers and agents
- Job applicants and our current and former employees

Data Protection Officer

The Data Protection Officer is the Lettings Manager at Glamorgan Student Letting. The Data Protection Officer is responsible for:

- Informing and advising the organisation and its employees about their obligations to comply with the GDPR and other data protection laws.
- Monitoring compliance with the GDPR and other data protection laws, including managing internal data protection activities and advise on data protection impact assessments.
- To be the first point of contact for supervisory authorities and for individuals whose data is processed (tenants, landlords, employees etc.).

The Data Protection Officer is delegated authority by the Chief Executive to carry out their role with the resources required to be effective in the protection and security of the individual data the organisation handles.

The Data Protection Officer can be contacted via email rachael.hall@southwales.ac.uk.

What is Personal Data?

Personal data is; any information that tells us something about you. This could include information such as your name, contact details, date of birth and references.

How do we collect Personal Data?

We collect personal data in the following ways;

When you give it us directly

You may give us your information in order to sign up for Property Alerts, a Tenancy, as a Landlord, a Supplier and/or a Contractor. We will only collect the personal data that we need and will take responsibility for looking after this information.

When you give permission to other organisations to share

We may combine information you provide to us with information available from external sources in order to gain a better understanding of our stakeholders to improve our communication methods, products and services.

The information we get from other organisations may depend on your privacy settings or the responses you give, so you should regularly check them. This information comes from the following sources:

- *Third Party Organisations* -You may have provided permission for a company or other organisation to share your data with third parties such as the Students' Union. This could be when you buy a product or service, register for an online competition or sign up with a comparison site.
- *Social Media* -Depending on your settings or the privacy policies for social media and messaging services like Facebook, WhatsApp or Twitter, you might give us permission to access information from those accounts or services.
- *Information available publicly* - This may include information found in places such as Companies House and information that has been published in articles/newspapers.

When we collect it as you use our Website and App

Like most websites, we use "cookies" to help us make our site – and the way you use it – better. Cookies mean that a website will remember you. They're small text files that sites transfer to your computer (or phone or tablet). They make interacting with a website faster and easier – for example by automatically filling your name and address in text fields.

In addition, the type of device you're using to access our website and the settings on that device may provide us with information about your device, including what type of device it is, what specific device you have, what operating system you're using, what your device settings are, and why a crash has happened. Your

device manufacturer or operating system provider will have more details about what information your device makes available to us.

If cookies are used they will only be used to assist the purposes set out in this privacy policy, but cookies will not be used if we do not consider them to be necessary.

What Information do we collect?

We collect or may collect the following categories of information;

- Name(s)
- Surname
- Date of Birth
- Email
- Contact Number(s)
- Student ID
- National Insurance No.
- Nationality
- Enrolment Status
- Institute of Study
- Year of Study
- Year of Graduation
- Employment Status
- Residential Status
- Pre & Post Address and Postcode
- Term Time Address and Postcode
- Business Address
- Proof of Address
- Student ID
- Valid Photo ID (Passport/Driving License/Gas Safe)
- Visa
- References Bank Details
- Next of Kin
- Employer Details
- Information about Criminal Convictions and Offences
- Rent Smart Wales License (Property/Landlord/Agent)
- HMO License Details
- Public Liability
- Employer Certificates

How do we use your Information once collected?

We use your data for the following purposes

- To check you are legally entitled to live in the United Kingdom
- To check your previous rental and payment history confirming your suitability as a tenant
- To pass on your details to the Landlord, Managing Agent or Tenant.
- To pass on your details to maintenance contractors and utility companies for the purposes of carrying out repairs and to ensure the utility companies can correctly bill the tenants during their tenancy
- To any joint tenants named on the Assured Shorthold Tenancy (AST) agreement to whom you have joint liability
- To notify you of offers or services that may be of benefit to you (this you are required to opt in to)

What is the legal basis that permits us to use your Information?

Under data protection legislation, we are only permitted to use your personal data if we have a legal basis for doing so as set out in the data protection legislation. We rely on the following legal bases to use your information for tenancy agreement and housing purposes;

- Where we need information to enter you into a contract with a Landlord or Tenant
- Where we need to comply with a legal obligation
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests

What happens if you do not provide Information that we request?

We need some of your personal data in order to advertise your property or conduct the tenancy application process. If you do not provide such information, we may not be able to continue with the letting process and offer a tenancy.

How do we share your Information and keep it secure?

Personal data collected and processed by us may be shared with Glamorgan Student Letting employees and under strictly controlled conditions the following groups where necessary:

- Contractors
- Advisors
- Agents
- Service provider partners

When we allow access to your information, we will always have complete control of what they see, what they are allowed to do with it and how long they can see it. We do not sell or share your personal information for other organisations to use.

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff, volunteers and contractors.

Some of our suppliers run their operations outside the European Economic Area (EEA). Although they may not be subject to the same data protection laws as companies based in the UK, we will take steps to make sure they provide an adequate level of protection in accordance with UK data protection law. By submitting your personal information to us you agree to this transfer, storing or processing at a location outside the EEA.

We may need to disclose your details if required to the police, regulatory bodies or legal advisors.

We will only ever share your data in other circumstances if we have your explicit and informed consent.

Your tenancy related data may be stored in any of the following:

- Secure storage on network drives. These are shared computer drives hosted by University of South Wales who have appropriate firewalls in place. Access to the drives are password protected and limited to the team of staff who may process the data.
- Folders are kept within a filing cabinet within the Letting Agency office. Access to the offices is restricted to a limited number of employees, and access to the filing cabinet is restricted solely to those that may process the information.
- Some information may be shared via email, this is only done via the secure outlook 365 system which is password protected and has suitable firewalls in place. Passwords are applied to certain files when sharing via email.
- Secure storage on the LetMC letting software platform. Access is password protected and limited to the team of staff who may process the data.
- Secure storage on the DocuSign online signature platform. Access is password protected and limited to the team of staff who may process the data.
- Secure storage on the Deposit Protection Service (DPS) platform. Access is password protected and limited to the team of staff who may process the data.
- Secure storage on the Landlord Tap platform. Access is password protected and limited to the team of staff who may process the data.
- Very occasionally, when other options are not suitable, a portable storage device such as a memory stick might be used. In these circumstances, the device would be encrypted with password protection, and only used for the period of time required.

We will ensure access to personal data is restricted to employees working within our group on a need to know basis. Training will be provided to any employees working within the group who need access to your personal data to ensure it is secured at all times. Suitable procedures are in place to ensure information is only kept as long as it is required, after which it is destroyed in a secure fashion.

How long do we hold your Information for?

We will only hold your personal data as long as is strictly necessary;

- Basic Personal data about perspective tenants for 12 months unless they have requested to have their details deleted.
- Landlord details are retained for future marketing purposes unless they have requested their detail be deleted.
- Statutory requirements to tenancy records for seven years following the conclusion of the tenancy.

Your rights in relation to your Information

You have a number of rights in relation to your personal data, these include the right to:

- be informed about how we use your personal data;
- obtain access to your personal data that we hold;
- request that your personal data is corrected if you believe it is incorrect, incomplete or inaccurate;
- request that we erase your personal data in the following circumstances:
 - if we are continuing to process personal data beyond the period when it is necessary to do so for the purpose for which it was originally collected;
 - if we are relying on consent as the legal basis for processing and you withdraw consent;
 - if we are relying on legitimate interest as the legal basis for processing and you object to this processing and there is no overriding compelling ground which enables us to continue with the processing;
 - if the personal data has been processed unlawfully (i.e. in breach of the requirements of the data protection legislation);
 - if it is necessary to delete the personal data to comply with a legal obligation.
- ask us to restrict our data processing activities where you consider that:
 - personal data is inaccurate;
 - our processing of your personal data is unlawful ;
 - where we no longer need the personal data but you require us to keep it to enable you to establish, exercise or defend a legal claim;
 - where you have raised an objection to our use of your personal data;
- request a copy of certain personal data that you have provided to us in a commonly used electronic format. This right relates to personal data that you have provided to us that we need in order to take steps to enter you into a tenancy or advertise your property and personal data where we are relying on consent to process your personal data;
- object to our processing of your personal data where we are relying on legitimate interests or exercise of a public interest task to make the processing lawful. If you raise an objection we will carry out an assessment to determine whether we have an overriding legitimate ground which entitles us to continue to process your personal data;
- not be subject to automated decisions which produce legal effects or which could have a similarly significant effect on you.
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If you would like to exercise any of your rights or find out more, please contact the Letting Agency via glamlet@southwales.ac.uk or 01443483531.

Changes to this Policy

We may change this Privacy Policy from time to time. If we make any significant changes in the way we treat your personal information we will make this clear on our website or by contacting you directly.

If you have any questions, comments or suggestions, please let us know by contacting glamlet@southwales.ac.uk

Links within our sites to other websites are not covered by this privacy policy.

Contact Details

Our contact details are as follows:

Address: Glamorgan Student Letting, Student Union, University of South Wales, Pontypridd CF37 1UF

Telephone: 01443 483 531