

TENANT & APPLICANT PRIVACY NOTICE

For prospective tenants, tenants, permitted occupiers and guarantors

|Version: 1.0

IN SHORT: We use personal information to assess applications, create and manage tenancies, protect property and people, and meet our legal duties. We only use information where we have a lawful reason and only share it where necessary.

01 WHO WE ARE

Aparthouse Property Management Limited ("Aparthouse", "we", "us" or "our") provides letting and property-management services for landlords. For the personal information we decide how and why to use, Aparthouse is a data controller. In some circumstances the property landlord may also be a separate or joint data controller.

Contact: 155 St Sepulchre Gate West, Doncaster, DN1 3AW | hello@aparthouse.uk | 01302 456674

02 INFORMATION WE MAY COLLECT

- Identity and contact information, including names, dates of birth, addresses, telephone numbers, email addresses, photographs and identification documents.
- Application and household information, including proposed occupiers, housing history, landlord references, employment, income, benefits, affordability information and guarantor details.
- Financial information, including bank statements supplied for affordability checks, payment records, rent accounts, arrears and deposit information.
- Right to Rent evidence, immigration-status information and share-code check results where required by law.
- Referencing, credit-check, fraud-prevention, sanctions and politically exposed person (PEP) screening results.
- Tenancy-management information, including the tenancy agreement, inventory, inspections, repairs, correspondence, complaints, antisocial-behaviour reports, access records and property photographs.
- Health, disability, vulnerability or other sensitive information where relevant to reasonable adjustments, safety, safeguarding, housing management or a legal claim.
- Information received from landlords, employers, previous landlords or agents, referees, guarantors, public registers, local authorities, utility providers and other lawful sources.

03 WHY WE USE INFORMATION AND OUR LAWFUL BASES

We use personal information only where data-protection law allows us to do so. Depending on the circumstances, we rely on one or more of the following lawful bases:

- **Contract** – to take steps requested before entering a tenancy or guarantee and to administer and enforce those agreements.
- **Legal obligation** – to carry out Right to Rent checks, protect deposits, comply with housing, safety, tax, court and regulatory requirements, and respond to lawful requests.
- **Legitimate interests** – to assess suitability and affordability, prevent fraud, verify information, manage properties and repairs, keep accurate records, protect the landlord's property, recover debts, deal with complaints and establish or defend legal claims.
- **Vital interests** – where using information is necessary to protect someone's life or physical safety.
- **Consent** – where we specifically ask for consent and no other lawful basis is more appropriate. Consent may be withdrawn, but this will not affect earlier lawful processing.

Where we use special-category information, we will also identify an additional lawful condition, such as explicit consent, substantial public interest, employment or social-protection law, vital interests, or the establishment, exercise or defence of legal claims. Criminal-offence information is handled only where legally permitted and necessary.

04 CHECKS AND DECISIONS

We may verify application information using documents you provide and information from referees, employers, previous landlords or agents, credit-reference or fraud-prevention services, the Home Office and public registers. Screening results inform the application, but Aparthouse or the landlord makes the final tenancy decision. We do not make solely automated decisions that produce legal or similarly significant effects unless we tell you beforehand and provide the safeguards required by law.

05 WHO WE MAY SHARE INFORMATION WITH

Where necessary and proportionate, we may share relevant information with:

- the property landlord, joint owners, superior landlord or their authorised representatives;
- referencing, credit-reference, fraud-prevention, identity-verification and screening providers;
- the Home Office and other government bodies where required for Right to Rent or another legal duty;
- the Deposit Protection Service or another authorised tenancy-deposit scheme;
- our property-management, accounting, payment, communications, document-storage and IT service providers;
- contractors, inventory clerks, inspectors, insurers, utility suppliers and local authorities where needed to manage the property, safety, bills or council tax;
- professional advisers, debt-recovery providers, courts, tribunals, bailiffs, regulators, ombudsman or redress schemes; and
- police, emergency services, safeguarding bodies or other authorities where disclosure is lawful and necessary.

We do not sell personal information.

06 INTERNATIONAL TRANSFERS

Some service providers may store or access information outside the United Kingdom. Where this happens, we will use an applicable adequacy regulation or appropriate contractual and organisational safeguards required by UK data-protection law. You may contact us for further information about relevant safeguards.

07 HOW LONG WE KEEP INFORMATION

We keep information only for as long as reasonably necessary for the purpose for which it was collected, including legal, accounting, regulatory and dispute-resolution requirements. In general:

- unsuccessful application and referencing records are normally retained for up to six months after the application closes, unless a longer period is required for a complaint, dispute, fraud prevention or legal obligation;
- tenancy, rent, deposit, inspection, repair and related management records are normally retained for up to seven years after the tenancy or our management ends;
- Right to Rent check evidence is retained for the tenancy and for at least one year after it ends, as required by the statutory scheme; and
- records connected with litigation, safeguarding, fraud, insurance or regulatory action may be kept longer where reasonably necessary.

When information is no longer required, it will be securely deleted, destroyed or anonymised.

08 SECURITY

We use reasonable technical and organisational measures to protect personal information against unauthorised access, loss, alteration or disclosure. Access is limited to people and service providers who need the information for legitimate business or legal purposes.

09 YOUR RIGHTS

Depending on the circumstances and the lawful basis used, you may have the right to:

- ask for access to your personal information;
- ask us to correct inaccurate or incomplete information;
- ask for information to be erased or its use restricted;
- object to processing based on legitimate interests or to direct marketing;
- receive certain information in a portable format;
- withdraw consent where processing is based on consent; and
- ask for human review of a qualifying solely automated decision.

YOUR RIGHT TO OBJECT: You have the right to object to processing based on legitimate interests. We will stop unless we can demonstrate compelling legitimate grounds or the processing is needed for legal claims.

These rights are not absolute. We may need to retain or continue using information where the law permits or requires it. To exercise a right, contact hello@aparthouse.uk. We may ask for information to verify your identity.

10 PROVIDING INFORMATION

Some information is required to assess an application, enter into or manage a tenancy, or comply with the law. If required information is not provided, we may be unable to process an application, enter into the tenancy, permit occupation or provide aspects of the management service. We will explain where providing particular information is optional.

11 COMPLAINTS

Please contact us first if you have concerns about how we use personal information. You also have the right to complain to the Information Commissioner's Office (ICO): ico.org.uk/make-a-complaint | 0303 123 1113 | Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

12 CHANGES TO THIS NOTICE

We may update this notice to reflect changes in law, guidance or our services. The current version will show its effective date. Where a change materially affects how we use existing information, we will take reasonable steps to bring it to the attention of affected individuals.