

## **CATEGORIES OF DATA**

### **ABOUT THIS TABLE**

As necessary, we collect, use and otherwise process different categories of information (data) about you relying on the various legal gateways available to us. This relates to your application for a tenancy/residency and, if this goes ahead, so that we can manage the tenancy and the property along with associated matters. This part of this notice gives you a general description of these processing activities for the different categories of information and the purposes for which we process your information. If you consider that we have not given sufficient details of what we do then you can make an access request for more information.

### **BACKGROUND**

Renting out residential accommodation and managing tenancies and rental properties is a multi faceted. As tenants and residents are at the centre of this service, we must process your data for a large number of different purposes. Data protection law requires us to give you information about these processing activities as concisely as possible. To do so we have split information about you into different categories, which is in line with requirements in the legislation. We also have to tell you the extent for which your information can be used and shared. Due to the nature of our business information falling into one category will be combined with information in other categories to be handled by us as permitted for the stated purposes under the relevant legal gateway which we have to identify. For example, information about your identity/contact details will be combined with other categories of information to correctly identify you, e.g. when we compile our accounts or pass information about a repair over to a contractor so that they can deal with the problem at the property you rent. However, we only do this to the extent that it is necessary in the circumstances.

### **EXPRESSIONS USED**

To make this Table as concise as possible we employ a number of expressions –

Handle information – collecting, compiling, using or storing information (data).

Use information – when we use information this means we consult it, compile it, refer to it to make a decision, or act on it, or combine it with other data. When using it in this way we may have to alter it.

Share data – this includes transferring data to someone else where this is necessary, or receive it from a third party.

Collect data – this is where we receive information either from you, e.g. when you sign a tenancy application form or from a third party, e.g. a reference about you.

Compile data – this is where we use information about you which we have collected to generate information about you, e.g. our rent payment records or repair records.

Next of kin etc. – this includes close relatives.

### **ALTERING DATA**

We are required by data protection legislation to keep your information up to date and it is of course in our own legitimate interests to do so for us to ensure that we have accurate records. For example, we keep our record of your rent payments up

to date as they are received.

### **STORING DATA**

We keep information both electronically and in a manual filing system to maintain our records. We do this because we need to use it from time to time. Normally the legal gateway permitting us to do so which will apply will be the same as applies when we use the data. Additionally, however, there are legal obligations to retain data under data protection law, taxation legislation and housing law. We also need to do so to fulfil our contract with you. In our own legitimate interests, we also need to retain information to deal with enquiries or disputes and for audit purposes.

### **DESTRUCTION OF DATA**

We delete/destroy data once it is no longer needed. This is a requirement of data protection law. This notice tells you the period for which we normally store data.

### **WHAT THIS TABLE TELLS YOU**

Information is handled as necessary from time to time. As already stated, information falling under one category can be amalgamated with or added to information in another category in order to carry out the stated purposes.

Part 1 of this Table tells you, depending on the relevant category of your information, what our processing activities are and what is the legal gateway permitting processing as well as the purpose for which we carry out these processing activities.

Where the legal gateway in question is our own legitimate interests (or those of a third party) we identify the relevant legitimate interests.

Details about sharing data are set out in Part 2, whether we transfer it to someone else or receive from a third party.

### **Part 1 – Collecting, compiling, using and storing your information**

In this Part we list out the different categories of your information, briefly explain them where needed, explain what we do with the information and why, as well as specifying the relevant legal gateway we rely on to do so.

We use the word “handle” to cover collecting, compiling, using or storing this information.

### **IDENTITY AND CONTACT DETAILS**

1. This includes name, contact details, date of birth and national insurance number
2. We handle this information in order to enter into the tenancy agreement and subsequently to manage the tenancy and the property. This is done to perform the contract.

### **PERSONAL AND BACKGROUND INFORMATION**

1. This includes details of the tenant’s present residence and their current landlord (if any), current occupation and status, employed, student etc., employer or educational institution, state benefits received, details of other residents, any bankruptcy or county court judgments, next of kin etc., pets

- and any photographs of yourself.
2. This information is handled to evaluate your suitability as a tenant. This is done for our own legitimate interests. These are to ensure that any let is to reliable tenants and residents with suitable guarantors where applicable.
  3. We also handle this information which relates to next of kin etc., to contact them in the event of an emergency. This is to protect your vital interests.
  4. This information will also be handled if we need to trace you to contact you in connection with the tenancy or the property or to pursue a claim against you, e.g. for rent arrears. This is in our own legitimate interests. These are to enforce your obligations, deal with property left behind at the property or to recover property.

#### **BANK DETAILS**

1. This includes details of your bank, building society or other paying organisation, including those operating digitally/online.
2. We handle this information in order to receive payments from you or on occasion to make payments to you. This is done to perform our contract.
3. We also handle this information if we seek to make recovery from you of unpaid debt. This is in our own legitimate interests. These are to recover what is due to us.
4. We also handle this information as part of our verification of your suitability as a tenant, including to protect against money laundering. This is in our own legitimate interests to ensure that we let to suitable tenants/residents and do not receive proceeds of crime.

#### **TENANCY DETAILS**

1. This includes renewals of the tenancy. Information within this category includes the address of the property, start date for the tenancy, period of occupancy, rent and other payments.
2. We handle this information to prepare and complete the tenancy agreement and then to manage the tenancy and the property. This is done to perform our contract.
3. Tenancies are renewed by agreement. This will involve a request from you. We handle information about the renewal of tenancies. This is done for contractual performance.
4. Where you are a joint tenant or there are residents living with you details of any other joint tenant or resident are linked with the tenancy/property.
5. We handle this information to prepare and complete the tenancy agreement and thereafter to manage the tenancy and the property. This is done so that we can form a contract.
6. Where there is a guarantee, e.g. from a parent, we collect information about the identity and contact details of the guarantor, background information about the guarantor and details of property owned. This is then linked to your tenancy and the property.
7. We handle this information to protect our own legitimate interests. This is to provide security for the payment of the rent and to ensure compliance with tenancy obligations.

#### **DEPOSITS (IF ANY)**

1. This includes the amount of a deposit, who pays it and in what shares and the steps taken to protect the deposit.
2. We handle this information to deal with the deposit received and to administer the deposit. This includes handling information about persons

who contribute towards the deposit who are not a tenant. This is done both for contractual performance and to ensure compliance with legal obligations relating to handling deposits under the Deposit Protection Legislation. This is to secure payment of the rent and compliance with tenancy obligations.

3. We also handle deposits at tenancy termination and this is dealt with under that section.

#### **IMMIGRATION/RIGHT TO RENT CHECKS (ENGLAND ONLY)/VERIFYING TENANT'S IDENTITY**

1. Under immigration legislation we check that each tenant and adult resident in the property has the right to rent. This includes retaining copies of passports, driving licences and other specified documentation. We must retain this for inspection if required by the Home Office.
2. We handle this information in accordance with the requirements of immigration legislation in order to carry out our legal obligations.
3. We also handle this information in order to verify the identity of tenants and residents along with guarantors in order to protect our legitimate interests. These are to ensure that we are dealing with the correct person. This is done in Wales as well as in England for this purpose.

#### **RENT AND PAYMENT COLLECTION**

1. This includes records we compile to record receipt of rent and other payments from you and associated documentation relating to such payments. This also includes any documentation where we need to issue reminders for payment, including levying charges for interest or fees for late payment.
2. We keep this information in order to compile correct and up to date records. This is done for contract performance.

#### **RECOVERY OF ARREARS, CLAIMS AND POSSESSION PROCEEDINGS**

1. In the event of non-payment of rent or other payments due, or if there is non-performance of the contract (including allegations against ourselves) then we record this and enter into relevant communications. This includes information and documentation related to any proceedings which may be commenced or brought against us in relation to these matters, including proceedings to recover possession of the property.
2. We handle this information in order to pursue recovery of what is owing to us and to enforce our rights, to defend claims, and to recover possession of the property. This is done in our own legitimate interests. These are to protect our property interests, to enforce our rights and to ensure payment due to us is made, as well as to defend any claims brought against us.

#### **REPAIRS/HOUSING STANDARDS/HEALTH AND SAFETY**

1. This includes condition surveys, inspection reports, reports of repairs required and information about actions taken. This extends to conditions and standards generally at the property including health and safety, e.g. gas safety.
2. We handle this information to ensure that the property and its contents are properly maintained. This is done both for the purposes of contractual performance and, where applicable, to comply with our legal obligations.

#### **BREACH OF TENANCY AGREEMENT/NUISANCE ETC.**

1. This includes complaints which we receive or information which we hold relating to alleged breaches by a tenant or resident (which could include a

child) including nuisance and anti social behaviour. This includes records and related communications. This includes complaints about these matters made by neighbours or other tenants or residents.

2. We handle this information so as to ensure that tenancy obligations are complied with and that tenants and residents live harmoniously with neighbours. This is to protect our own legitimate interests and the legitimate interests of affected third parties. These legitimate interests are ensuring the tenancy obligations are complied with as well as the prevention and detection of crime and anti-social behaviour.
3. We also handle this information under a legal obligation where there is a selective licensing area in force or where the property is a licensed house in multiple occupation (HMO) or under the licensing scheme operating in Wales.

### **COUNCIL TAX LIABILITY**

1. Notification is given to the local authority in relation to tenant/resident liability for Council Tax. This can include information about the period of occupancy as well as former and subsequent addresses.
2. We handle this information in order to ensure that the liability for Council Tax is dealt with correctly. This is done to protect our own legitimate interests and those of the local authority. These are for the correct billing and collection of Council Tax and to ensure that we do not have to meet Council Tax liability ourselves where this is not appropriate.
3. In the event of the local authority serving a statutory notice we then we must supply this information to comply with our legal obligations.
4. Where appropriate the tenant may be entitled to a reduction in Council Tax (formerly called Council Tax benefit). Information is handled relevant to claims made by tenants. This is in the interests of the local authority administering the scheme to see that benefits are properly calculated and paid.

### **WATER CHARGE PAYMENTS**

1. This relates to notification to a water company of the tenants/residents who are living at the property their periods of occupancy and it can include previous and subsequent addresses. It also relates to communications between ourselves and the water company concerned.
2. In the area covered by Welsh Water this information is handled pursuant to a legal obligation.
3. Outside the Welsh Water area we handle this information to establish liability for water charges in our own legitimate interests and those of the water company concerned. This is to ensure that legal liability for payment of water charges is correctly established and discharged.

### **UTILITIES AND OTHER SERVICE PROVIDERS**

1. We arrange and establish liability for payment of gas and electricity consumed at the property and any services which are provided, e.g. Broadband or cable tv. These services may be provided as a requirement under the tenancy agreement. It includes communications about changes of tenants, interruptions and disconnection of supply and work to be carried out in connection with utilities and services such as the installation of smart meters/replacement meters.
2. We handle this information in order to arrange provision of utilities and services and ensure that the correct liability for relevant charges is

established and that these are paid for. This is done in our own legitimate interests and those of the utility company/provider concerned. These are to ensure utilities and services are provided and that liabilities are paid.

3. We also handle this information in order to deal with breakdowns, interruptions and disconnections and to ensure that the appropriate quality of service is provided. This is done in our own legitimate interests. These are to ensure that requisite utilities and services are available and are provided at the property.

#### **UNIVERSAL CREDIT/HOUSING BENEFIT/LOCAL HOUSING ALLOWANCES**

1. Where eligible a tenant will be entitled to the appropriate welfare benefits to assist them to pay rent. Information may be required by the Department for Work and Pensions (DWP) or local authority to verify entitlement. Normally, payment of benefit is made direct to the tenant; however, if the tenant is vulnerable or there are arrears, payment of benefit can be made direct to us. This extends to Council Tax reductions (the old Council Tax benefit).
2. We handle tenancy details and rent payment records, including information about arrears of rent, and the tenant's personal circumstances, relevant to the processing of claims and the administration of benefits. This is done for contractual performance. It is also carried out in our own legitimate interests to secure payment of rent due to us.
3. We handle information relevant to applications for benefit and in particular applications for direct payment to ourselves including reasons for non-payment of rent. This is for contractual performance.
4. On occasion where direct payment has been made to us there may be claims by the benefit authority for recovery of overpayments. We handle information relevant to such claims. This is done for our own legitimate interests. These are to ensure that we can collect and retain rent due to us.

#### **TENANCY TERMINATION**

1. A tenancy may run out and the tenant leaves. Tenants can leave early while the tenancy is still running on. We may serve notice requiring the tenant to vacate and, if need be, enforce this by court possession proceedings.
2. Tenancy terminations of whatever kind also involve the return of any deposit paid, possible claims against guarantors, claims on rent insurance or property insurance, arrangements for tenants/residents to vacate the property, tenants/resident's property being left behind. They also give rise to issues around the state and condition in which the property has been left, e.g. cleanliness.
3. We handle information relevant to these matters concerning tenancy termination. This is done in our own legitimate interests. These are to ensure that the property is returned to us in a proper state with vacant possession and that all appropriate financial claims by either party against the other are correctly dealt with. These include our obligations in relation to the refund of deposits, to comply with our contractual obligations between us and the tenancy deposit scheme with whom the deposit is protected.

#### **COMPLAINTS**

1. We operate a complaints procedure which may be informal. Although we will do all we can unfortunately sometimes things go wrong so complaints may arise.
2. Information handled concerns complaints which you may make or which may be made on your behalf. These will give rise to communications and

records being compiled by us.

3. We handle complaints with a view to resolving these, although this might involve external intervention, e.g. by the courts.
4. We handle complaints for contract performance. This is also done in our own legitimate interests. These are to protect ourselves against claims and to ensure that the complaints are properly resolved.

#### **HEALTH/DISABILITY**

1. Importantly, this is sensitive personal information to which additional protections apply. We may be given information about your health (whether mental or physical) or disabilities.
2. Health information may be given to us to explain your absence from the property or as a reason why rent has not been paid. You may wish us to have information about your health so that we are aware of how you may need assistance on occasion. This could also be information about health or disabilities affecting someone else which impacts on you.
3. We may be given information about your disabilities so that we can make particular arrangements for you, including any adaptations which may be required to make under disability discrimination legislation.
4. We handle information about your health or disability, and the health of others depending upon the circumstances to assist us in the management of the tenancy and the property. This may be to protect your vital interests. It may alternatively be for contractual performance where it affects your ability to perform your contractual obligations under the tenancy agreement. It will be in our own legitimate interests if we are told of any medical condition which affects you. This is so we are aware of possible impacts on you.
5. In regards to information concerning any disability, we handle this information to assist in the management of the tenancy and the property. This may also be under a legal obligation where we are obliged by law to make provision to deal with your disability.
6. In addition, as this is special category data, additional legal requirements are imposed upon us about your health and/or disability and we may request your consent to handle this information.

#### **CCTV AND AUDIO**

1. If we operate cctv you will be given information about this. We may operate cctv to cover common parts or the exterior of the premises.
2. We may also hold audio recordings, e.g. messages from you on telephone answering machine or mobile phone.
3. Where cctv is operated this is for the safety and security of the premises in question and for the prevention and detection of crime and anti social behaviour, as well as monitoring tenancy obligations. This is done in our own legitimate interests. These include the protection of our property and ensuring compliance with tenancy obligations as well as the safety and security of tenants, residents and neighbours.
4. We handle audio recordings to assist with accurate record keeping. This is done for contract performance or in our own legitimate interests. These are to ensure that we have reliable records of communications.

#### **CORRESPONDENCE ETC**

1. Correspondence includes all ways in which we receive communications from whatever source. This includes emails, text messages, social messaging and messages, letters and documentation. This can include photographs and

- other visual recordings.
2. We handle these communications initially relating to entering into the tenancy agreement and then for the management of the tenancy and the property, as well as associated matters arising under the various categories of information referred to in this Table. This is done for contractual performance where applicable, to carry out any applicable legal obligations imposed on us, to protect your vital interests, or in our legitimate interests. These legitimate interests are to ensure that we have the necessary information relating to these matters and for accurate record keeping.

#### **WEBSITES AND ONLINE PLATFORMS**

1. Information about you is available in the public domain, often put there by you. This can be accessed by appropriate searches which allow for access to the websites which hold this information.
2. Information about you is also made available when you access online platforms, e.g. to enquire about properties which are available for renting.
3. We handle this information to assess your suitability for tenancies/residency and for the management of the tenancy and the property. This is in our own legitimate interests to ensure that tenants/residents are suitable and that the tenancy and the property are effectively managed. This can include ensuring that tenancy obligations are performed. These legitimate interests are to ensure that our property interests are protected and our rights are enforced.
4. We handle information received via our online platforms for contract performance, including arranging lettings and entering into tenancy agreements.

#### **INSURANCE**

1. We insure the buildings and may insure contents belonging to us. We may also insure against public liability, including liability to yourself for injuries and rental insurance, in the event of rent arrears or other tenancy default.
2. We handle information about you which may be relevant to our insurances to arrange cover, to administer insurance contracts, to renew insurances and to make claims. Contractually we are under certain duties, e.g. to disclose information to the insurers. We handle this information to protect our legitimate interests. These are to ensure that appropriate risks are adequately insured against and to recover any sums due to us under the policy as a result of claims.
3. It is your responsibility to insure your own contents/belongings. You may seek information from us relevant to arranging such insurance or making claims. We handle this information and will do so with your consent which is provided as part of your request for any assistance or information.

#### **FLAT MANAGEMENT**

1. This applies in particular where the property is a flat. This flat will be held by us under a lease or subject to other contractual arrangements which will set out various responsibilities for the upkeep, insurance etc., of the block including common areas. The lease or other arrangements place contractual obligations on us which in turn may be passed on to you under the terms of the tenancy.
2. We handle information about you in order to carry out our responsibilities under these leases/arrangements. This is done in our own legitimate interests and in the interests of the freeholder etc., of the block so as to



ensure that respective obligations are properly performed.

### **CAR REGISTRATION**

1. We hold records of car registrations for vehicles which you keep at or in the vicinity of the property.
2. We handle this information to manage the property for contract performance.
3. We also handle this information in our own legitimate interests and those of others such as neighbours in order to monitor and regulate parking. This is to protect our own property interests and rights and those of others such as neighbours who may be affected by parking issues.

## **PART 2 – SHARING INFORMATION**

### **INTRODUCTION**

We share your information with various persons, organisations and public authorities as necessary. This involves us either transferring your information to others or collecting it from them, depending upon the circumstances. This Part of the Table gives you details about this. It can be a two-way traffic between ourselves and others. In some instances, we may collect information about you from someone else following a request by us to them to provide this information.

Where we collect information from others (third parties) we have to tell you the source of this information, whether or not it is publically accessible, the nature of the source (i.e. whether it is publically or privately held) and the types of organisation from whom the information is obtained. Where possible we need to name the source as well but often this cannot be done. The required details appear in this Part of the Table.

Where information is received from a private person/body or a public authority, this information will not normally be publicly accessible, however in some instances it will be. Information which will be publically accessible will be information such as Council Tax bandings and information available in public registers, e.g. registers of births and other available public registers.

We share identity and contact details with all persons, organisations/authorities referred to below. This category of information is linked with the other information in every category for the purposes and under the legal gateway specified under each of the other categories of information. This is to ensure that you are correctly identified and, if need be, can be contacted.

### **A – SHARING OF CERTAIN CATEGORIES OF YOUR INFORMATION**

We share certain categories of your information (both transferring it to them and collecting it from them as necessary) with private persons/organisations and public authorities as necessary.

In Section B we go onto explain that, as necessary, certain private persons/organisations and public authorities can share any of your information (irrespective of its category).

Table 1 below identifies the different categories of your information and specifies the private persons/organisations/public authorities with whom these different categories of your information are shared as necessary. This Table should be read

in conjunction with Table 2 (private persons/organisations) and Table 3 (public authorities). Tables 2 and 3 explain why we share your information with these persons/organisations/public authorities and the legal gateway which allows this to happen.

Depending on the category of data concerned you should also refer to that category under Part 1 above because the purposes set out for which we handle data and the legal gateway for doing so also usually apply when we share data with others.

Table 1 – Data categories and who they are shared with

Data category	With whom we share the data
Personal/background information	Other landlords/employers; debt collectors/tracing agents; next of kin etc.; insurers; banks etc.
Bank details	Our bank, credit reference agency; debt collectors/tracing agents
Tenancy details	Other landlords/employers, benefit authority, taxation authority
Deposits (if any)	Tenancy deposit body; debt collectors/tracing agents; taxation authority
Immigration/right to rent checks (England only) and verification of tenant's identity	Home Office; credit reference agency (for verification of identity)
Rent and other payments	Bank, benefits authority, taxation authority, joint tenants/resident's guarantor, insurers, other landlords
Recovery of arrears, claims and possession	Debt collectors/tracing agents, other landlords, taxation authority, joint tenants/residents, guarantors; insurers
Repairs/housing conditions/health and safety	Contractors, tradespeople, etc., deposit protection body, joint tenants/residents, freeholder flat management etc., guarantors
Breach of tenancy agreement/nuisance etc.	Contractors, tradespeople etc., deposit protection body, joint tenants/residents, guarantors, educational institution, neighbours, other residents etc., freeholder, flat management agents etc., insurers
Council Tax liability	Taxation authority (local authority)
Water charges	Welsh Water/Dee Valley Water Company (where property is located within the Welsh Water area) and other water companies
Utilities and services	Utility suppliers and service providers, e.g. Broadband
Universal Credit, housing benefit etc.	Benefit authority (Department for Work and Pensions or local authority), regulatory authority, joint tenants/residents/guarantors
Termination of tenancy	Other landlords, educational institutions, debt collectors/tracing agent, taxation authority, deposit protection body, bank joint tenant/resident/guarantors, freeholder managing agents etc.
CCTV/audio/ recording table	Deposit body, joint tenants/residents, guarantor, next of kin etc.

Correspondence etc.	Depending upon the applicable category of information relevant correspondence etc. is shared with any of the persons/organisations/authorities listed in Section A.
Online platforms	Joint tenants/residents; guarantors
Insurance	Insurers, banks etc.
Flat management	Freeholders, flat managing agents etc.

**TABLE 2 – PRIVATE PERSONS/ORGANISATIONS**

Categories of persons /organisations	Purpose and legal gateway
Other landlords/employers	To obtain references. This is to ensure suitability for a tenancy in our own legitimate interests. We also provide information to prospective landlords in their legitimate interest to assist them in evaluating suitability for a tenancy/residency. These interests are to ensure that properties are let to reliable tenants/residents. Where the property is subject to selective licensing there is a legal obligation for new landlords to obtain references before they let.
Contractors/tradespeople/service suppliers	Assisting in carrying out our responsibilities under the tenancy agreement and for the management of the tenancy and the property for contractual performance. In certain cases, this is also to comply with our legal obligations in relation to housing conditions and health and safety, e.g. gas, electrical and fire alarm maintenance and inspection. We will also provide your contact details to contractors etc., to facilitate access to the property for contract performance. On occasion we will arrange for inspections in our legitimate interests. This is so that we can deal with complaints and pursue/defend claims.
Utility companies and service providers, e.g. Broadband	Arranging for utilities/services and establishing liability for payment along with administering their supply in our own legitimate interests and those of the provider. This is to ensure utilities/services are provided and that liability is correctly established. Utility companies also have certain statutory obligations to perform, e.g. metering. In the case of utilities or other service providers if we agree to provide any relevant utility or services as part of the tenancy agreement then these arrangements are made for contractual performance. Otherwise, they are in the legitimate interests of the utilities/service providers to ensure

	that they can effectively carry out their various activities.
Credit reference agencies	We request and consider credit and other referencing relating to deciding on the suitability of tenants and residents for a tenancy. This is in our own legitimate interest to ensure that we let to reliable tenants/residents. This may include the Residential Landlords Association who undertake on behalf of their members with Call Credit.
Debt collects/tracing agents	To trace you or make a claim in our legitimate interests. These are to enforce our legal rights.
Joint tenants/residents	Management of the tenancy and the property for contractual performance. Additionally, in our own legitimate interests and those of joint tenants/residents where there are arrears of rent or other payments due or breaches of the terms of the tenancy agreement as they are either jointly liable for performance or non- performance could adversely impact on their continued residence at the property. The legitimate interests are to protect our own property interests and to enforce our rights.
Guarantors	Management of the tenancy and the property for contractual performance. We also inform guarantors of claims and liabilities for contractual performance of the guarantee. It is in our own legitimate interests and those of the guarantor to give and receive information relating to non- performance of tenancy obligations including non- payment of rent and other payments. Our interests are to protect our property interests and to enforce our rights and the guarantor's interests are so that the guarantor is aware of possible liability under the guarantee.
Next of kin etc.	To make contact with them in the event of an emergency to protect your vital interests.
Insurers	To arrange public and other liability insurance and rent insurance and to make claims. This is in our legitimate interests and the insurers legitimate interests. These are making sure that appropriate insurance is arranged and the policies are correctly administered. Under the terms of policies, we are required contractually to provide information to insurers.
Banks and lenders	Where we have loans, information regarding tenancies must be provided to arrange and administer loans. This is in our own

	<p>legitimate interests to finance our business. Contractually they are entitled to your information. In the case of banks information about you can be shared for the purposes of administering rental and other payments for contractual performance. Your information can also be shared for the purposes of preventing and detecting money laundering and fraud. This is in our own legitimate interests and those of the bank in order to detect crime. Contractually we may be required to provide information regarding insurance cover to banks etc. providing us with loans. This is in our legitimate interests to ensure compliance with the loan conditions and in the interests of the bank etc. to see that appropriate insurance cover is in place.</p>
<p>Neighbours, other tenants and residents</p>	<p>The management of the tenancy and the property. This includes information relating to complaints including alleged breaches of the tenancy agreement and anti social behaviour, as well as the abandonment of the property. It can include car registration information. This is in our own legitimate interests to protect our property rights and to enforce compliance with the terms of the tenancy. It is also in the legitimate interests of neighbours for their enjoyment of their own properties and to protect their property, interests and rights.</p>
<p>Flat freeholders, managing agents etc., where the property is a flat.</p>	<p>The management of the tenancy and the property. Under leases/other contractual arrangements they are entitled to certain information, e.g. who occupies the flat and the terms of such occupation. Further, consents/permissions may be required relating to the tenancy for the carrying out of alterations or works or your information may be relevant to repairs. This is done in our own legitimate interests. These are to ensure we comply with our own contractual obligations. Additionally, there may be complaints involving breach of the terms of these leases/other contractual provisions connected with nuisance, non-compliance with leases/other arrangements or anti social behaviour. Consequent upon this information may be shared in our own legitimate interests or those of the freeholder managing agent etc., concerned. This is to ensure compliance with our own contractual legal obligations and/or for the management</p>

	of the block.
Web sites, portals etc.	Undertaking searches and obtaining publically available information relevant to your suitability for a tenancy/residency and relating to the management of the tenancy and the property. This is undertaken in accordance with applicable data protection law and guidance and subject to data protection principles. In connection with your application for a tenancy, we may receive information via any online portal involved for contractual performance.

**TABLE 3 – PUBLIC AUTHORITIES**

Home Office	Immigration/right to rent checks for the performance of our legal obligations
Benefit authority	The administration of benefits such as Universal Credit (by the Department for Work and Pensions) and the housing benefit/local housing allowance by the local authority. This includes applications to them for direct payment of benefit to ourselves. It extends to claims by them for overpayment where we receive direct payments. This is for contractual performance and/or in our legitimate interests to ensure that we collect rent and that amounts properly due to us are received.
Deposit body	Under housing legislation we are required to protect any deposit which you pay in connection with the tenancy. We may pay this into a custodial scheme which holds the money or alternatively hold it ourselves in which case it is insured. We have to register the deposit with the deposit body concerned. This is to comply with our legal obligations. During the course of the tenancy it may be necessary to give details of any changes to the deposit body to comply with our legal obligations. On the termination of the tenancy for contractual performance we must arrange for the return of the deposit in whole or in part depending on whether there are any claims on it or not by us. In the event of disputes these can be submitted to adjudication in which case it is necessary for information to be provided to the deposit body concerned (and its adjudicator) in our legitimate interests to pursue or defend claims. This is also contractually required under the rules of the scheme.
Educational institutions	Information relating to non- payment of rent, breach of tenancy terms, nuisance or anti social behaviour may be shared with educational institutions where you are studying. Educational institutions can operate complaints schemes in conjunction with landlords of student properties. This can include

	information about tenancy terminations. This is in our own legitimate interests to protect our property interests and our rights and in the interests of the educational institution concerned to oversee the conduct of their students.
Taxation authorities	These are HM Revenue and Customs and (in the case of Council Tax and Council Tax reduction schemes) local authorities, as well as any other public authority having power to levy taxes or charges. We are required by law to make appropriate returns to comply with legislation imposing taxes etc. In the case of Council Tax this is required where statutory notice to that effect is served on us. Otherwise, we share information with the local authority relating to Council Tax in our own legitimate interests to ensure that Council Tax is correctly administered and in the legitimate interests of the local authority to collect information for the same reason.

B – Private persons/organisations/public authorities with whom any information is shared

As necessary, we share all of your information (irrespective of its category) with certain private bodies/organisations/public authorities. This includes transferring your information to them and receiving it from them. These are

Category of person/organisation/public authority	Purposes and legal gateway
Professional advisers	Assistance and advice regarding the management of the tenancy and the property for contractual performance. Where we handle your information under some other gateway and a professional adviser assists or advises this will be for the same purpose and under the same legal gateway. If it is in the legitimate interests of ourselves or someone else then those interests will be the same. These are to ensure that we act appropriately and properly as well as according to the law.
Police/law enforcement agencies*	Prevention/detection of crime and anti social behaviour in our and their legitimate interests. This is to protect our property and enforce our rights and to enforce the law.
Regulatory authorities*	To carry out their functions in their legitimate interests. These are to enforce legal requirements. On occasion, we may be under a legal obligation to provide your information, particularly if a notice to that effect is served on us. This can include an ombudsman or accreditation or similar scheme of which we are a member. It also includes water companies, utility providers who are exercising their functions as statutory undertakers.
Courts*	The administration of Justice in our legitimate interests. These are to pursue and defend claims.
Prospective purchaser of the property	In the event of a proposed sale/sale of the property either subject to the tenancy or with vacant possession any

	prospective purchaser/purchaser will require information about the tenancy and the property. This is in our own legitimate interests and their legitimate interests. This is part of the conveyancing and sales process for both parties. The legitimate interests are to ensure that correct information is provided and received.
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\* These are public authorities

**NAMES OF PERSONS/ORGANISATIONS/PUBLIC AUTHORITIES WITH WHOM INFORMATION IS SHARED**

Where we are able we have to provide you with the identity of the persons/organisations/authorities which are referred to in Tables 1, 2 and 3 above.

Email provider: Microsoft  
Website provider/host: Wix  
Cloud storage: Microsoft