

## **Annington Tenants Privacy Notice**

### **1. What is this document and why should you read it?**

The Annington company:

- you have a tenancy agreement with;
- that built, developed or owns a property you occupy and/or have access to; and/or
- you are otherwise interacting with,

is a controller of your personal data (and is referred to in this privacy notice as "**we**", "**us**", "**our**").

This privacy notice explains how and why this Annington company ("**we**", "**us**", "**our**"), part of the Annington Group of companies (each such company and all such companies together referred to as "**Annington**"), uses personal data collected about potential, actual and previous tenants, and occupiers or those that have access to tenanted properties ("**you**", "**your**") of properties that Annington lets ("**Annington Properties**")

You should read this notice, so that you know what we are doing with your personal data.

Please note that this privacy notice supplements Annington's website privacy notice (<https://www.nington.co.uk/privacy-policy/>) which also sets out how Annington uses your personal data when you use Annington's website (the "**Website**"). You should read the Website privacy notice in conjunction with this notice.

This notice explains how we use your personal data when you register an interest or request details about one of our properties, when you rent a property from us or occupy/access a property that we have let, or when you otherwise communicate or engage with us in relation to an Annington Property. Depending on your relationship with us, or Annington more widely, we or Annington may use your personal data for other purposes and one or more other Annington privacy notices may then also apply to such specific uses of your personal data.

Please also read any such other privacy notices from us or Annington.

### **2. Annington's data protection responsibilities**

Please refer to section entitled 'Annington's data protection responsibilities' in the Website privacy notice: <https://www.nington.co.uk/privacy-policy/>

### **3. What types of personal data do we collect, and where do we get it from?**

We collect and process different types of personal data about you when you use the Website, register an interest or request information about an Annington Property, when you rent a property from us or occupy or have access to a property that we have let, when you visit or use Website, or where you otherwise communicate or engage with us. We may also obtain some personal data from other sources, and create some personal data ourselves.

It is your responsibility to make sure the personal data you provide to us is complete and accurate and you must help us to keep it accurate and up to date. If you have a current or ongoing relationship with us and any of the personal information you have given to us changes, such as your contact details, please inform us without delay by contacting <mailto:dataprotection@nington.co.uk>.

The table below sets out the different types of personal information that we may collect. The details will be collected directly from you but sometimes may be obtained from other

sources, such as from other individuals who rent and/or occupy the property with you, from previous landlords and/or from your employer (where we request references), from CCTV on site or from credit agencies.

Occasionally, we will use your personal data when it has been provided by a person on your behalf, such as your spouse, partner, a relative, or your other representative e.g. your agent, solicitor or other professional adviser (your "**Representative**").

| <b>Types of personal data</b>  |
|--|
| <b>Potential, current and previous tenants</b>   |
| <ul style="list-style-type: none"><li>• Name and Title</li><li>• Address, Telephone and Email address</li><li>• Responses to surveys</li><li>• Monthly budget (if provided) and whether funds are held for the reservation fee/deposit</li><li>• Bedroom &amp; furnishing requirements and any other property requirements (if provided)</li><li>• Right to Rent checks (including immigration/visa status, photo ID and proof of address)</li><li>• Date of birth, salary and employer (for right to rent checks)</li><li>• Preferred method of contact</li><li>• Reasons for moving</li><li>• Current housing situation (e.g. if already renting) including current or most recent address</li><li>• Next of kin</li><li>• Timescales for moving</li><li>• Job title and working location</li><li>• Names of potential occupiers</li><li>• Any pets</li><li>• Smoking/non-smoking</li><li>• Viewing availability and details</li><li>• Correspondence history, details of queries, complaints and disputes</li><li>• Party profile (e.g. sharers, couple etc.)</li><li>• Where you heard about us</li><li>• Any feedback you provide</li><li>• Deposit details (requested, paid and/or returned)</li><li>• References about you</li><li>• Bank account and details of rent payments to us</li><li>• Credit card details</li><li>• Credit status</li><li>• Tenancy start and end dates</li><li>• Copy of contracts and agreements</li><li>• Your testimonial if you provide one</li><li>• Photographs of you</li><li>• CCTV images</li><li>• Vehicle registration</li><li>• Financial situation and history</li><li>• Public (electoral register) information</li><li>• Information on shared credit, financial situation and history and fraud prevention</li><li>• Data relating to any vulnerability (as defined by the Financial Conduct Authority) which you (or occupiers of the property, which may include persons under the age of 18) may have</li><li>• If you voluntarily disclose the following types of Sensitive Information (see section 5 below):<ul style="list-style-type: none"><li>○ Racial or Ethnic origin</li><li>○ Political opinions</li><li>○ Religious or philosophical beliefs</li><li>○ Trade union membership</li><li>○ Health Data (which may relate to vulnerability or access)</li></ul></li><li>• Your attendance at events arranged by or on behalf of us, and other events which we notify you of ("<b>Events</b>")</li><li>• Communications we may have with you, whether relating to an Event or not</li></ul> |

- Any additional information that you provide to us voluntarily, including (for example) requirements for attendance at Events

#### **Prospective, current or previous occupiers/those that have property access**

- Name and Title
- Address, Telephone and Email address
- Availability
- Property occupied, responsible tenant and related information about their tenancy
- Your testimonial if you provide one
- Photographs of you
- CCTV images
- Vehicle registration
- Data relating to any vulnerability (as defined by the Financial Conduct Authority) which you (or other occupiers of the property, which may include persons under the age of 18) may have
- If you voluntarily disclose the following types of special category data:
  - Racial or Ethnic origin
  - Political opinions
  - Religious or philosophical beliefs
  - Trade union membership
  - Health Data (which may relate to vulnerability or access)
- Your attendance at events arranged by or on behalf of us, and other events which we notify you of ("Events")
- Communications we may have with you, whether relating to an Event or not
- Any additional information that you provide to us voluntarily, including (for example) requirements for attendance at Events

#### **4. What do we do with your personal data, and why?**

We process your personal data for particular purposes in connection with your tenancy and/or occupation of or access to one of our Annington Properties and, dependent on such use and your relationship with us, to deal with your enquiry or your communication or other engagement with us, and the management and administration of our business.

We are required by law to always have a "*lawful basis*" (i.e. a permitted reason or justification) for processing your personal data. The table below sets out the purposes for which we process your personal data and the relevant lawful basis on which we rely for that processing.

Please note that where we have indicated below that our processing of your personal data is either:

- (a) necessary for us to comply with a legal obligation; or
- (b) necessary for us to take steps, at your request, to potentially enter into a contract with you, or to perform it,

and you choose not to provide the relevant personal data to us, we may not be able to enter into or continue our contract or engagement with you.

|  |   | Lawful basis   |  |   |   |
|--|---|--|--|---|---|
|  |   | Your consent   | To perform a contract with you                                       | To comply with a legal obligation             | For our legitimate interests  |
| <b>Communications with you</b>                   |   |  |  |   |   |
| a)   | Responding to your requests, enquiries and/or customer complaints, including sending you details of properties you have requested and/or in dealing with property related queries or concerns |  | ✓  | ✓<br>(where mandatory for us to do so by law) | ✓<br>(to respond to you in relation to such matters)  |
| b)   | Confirming and processing leases or other orders for goods or services that you may make with us  |  | ✓<br>(for property leases to you)                                    |   | ✓<br>(to conclude leases involving other tenants)   |
| c)   | Sending you information (including direct marketing) as set out in the section " <i>How do we communicate with you?</i> ", below  | ✓<br>(direct marketing information where we need your consent) | ✓<br>(keeping you updated on the transaction)                        |   | ✓<br>(to keep you updated on transactions, orders and with other helpful updates and direct marketing in other cases) |
| <b>Background and identity check information</b> |   |  |  |   |   |
| d)   | Performing know your client and anti-money laundering checks in relation to your tenancy  |  |  | ✓   | ✓<br>(to ensure compliance with anti-money laundering requirements and good governance)                               |
| e)   | Performing identity checks in relation to certain your tenancy  |  |  | ✓   | ✓<br>(to ensure that the identity of our customers is verified)   |
| f)   | Performing credit checks in relation to your tenancy  |  | ✓ (or at your request, to enter into the tenancy agreement with you) |   | ✓ (to make sure that those renting from us have the necessary funds and commitment to pay, to ensure we are paid)     |
| g)   | Performing right to rent checks   |  | ✓ (or at your request, to enter into the tenancy agreement with you) | ✓   |   |
| <b>The property</b>                              |   |  |  |   |   |

|                       |  | Lawful basis  |  |                                   |   |
|-----------------------|--|---|--|-----------------------------------|---|
|                       |  | Your consent  | To perform a contract with you               | To comply with a legal obligation | For our legitimate interests  |
| h)                    | To find the right property for you   |   | ✓ (if you contract with us as an individual) |                                   | ✓(where you represent your employer or organisation, or a tenant who contracts with us)               |
| i)                    | To deal with your requested or agreed property rental to complete the tenancy with you   |   | ✓ (if you contract with us as an individual) |                                   | ✓ (where you represent your employer or organisation, or a tenant who contracts with us)              |
| j)                    | To take payment and receive / deliver goods or services to you or the business you represent, to deal with any complaints or any after sales services  |   | ✓ (if you contract with us as an individual) |                                   | ✓ (where you represent your employer or organisation, or a tenant who contracts with us)              |
| k)                    | Arranging appointments and organising access to property for maintenance, repair and inspection purposes, including obtaining and using occupier details   |   | ✓ (if you contract with us as an individual) |                                   | ✓ (where the occupier does not directly rent the property from us)                                    |
| l)                    | To carry out checks to identify potential fraudulent transactions, to prevent and detect crime and protect genuine customers and our business from fraud to minimise the risk of false details being used, and abuse of card / other details by fraudsters |   | ✓  |                                   | ✓ (to protect our business and the public from fraud and crime – this is also in the public interest) |
| <b>All categories</b> |  |   |  |                                   |   |
| m)                    | To host Events   | ✓ (where Sensitive Information (see section 5 below) is provided by you |  |                                   | ✓ (to host prospective/current tenants/occupiers to discuss property interests)                       |

|    |  | Lawful basis                                     |   |                                   |  |
|----|--|--|---|-----------------------------------|--|
|    |  | Your consent                                     | To perform a contract with you                  | To comply with a legal obligation | For our legitimate interests   |
|    |  | voluntarily e.g. dietary or access requirements) |   |                                   |  |
| n) | Establishing and enforcing our legal rights and obligations and monitoring to identify and record fraudulent activity  |  |   | ✓                                 | ✓<br>(to protect our business and the public from fraud and crime – this is also in the public interest and may be needed to deal with legal claims) |
| o) | Complying with requests, orders and instructions from law enforcement agencies, public authorities, regulators, any court, parties to proceedings or otherwise deal with obligations required by law or regulators and to ensure good governance and compliance  |  |   | ✓<br>(where binding)              | ✓<br>(where not binding but good governance and in the public interest)  |
| p) | For our general record-keeping and relationship management   |  | ✓<br>(if you contract with us as an individual) |                                   | ✓<br>(where you represent your employer or organisation, or a tenant who contracts with us and we need this to run our business properly)            |
| q) | Managing the funding, proposed sale, restructuring or merging of any or all part(s) of our business and/or any Annington Properties, and/or their financing/re-financing including to respond to queries from the prospective or actual buyer/investor/funder or merging organisation, including to verify our |  |   |                                   | ✓<br>(to sell any part of our business or assets)  |

|    |   | Lawful basis |                                     |                                   |  |
|----|---|--------------|-------------------------------------|-----------------------------------|--|
|    |   | Your consent | To perform a contract with you      | To comply with a legal obligation | For our legitimate interests   |
|    | Annington compliance and record keeping   |              |                                     |                                   |  |
| r) | To keep records required by law or to evidence our compliance with laws, including tax laws, consumer protection laws and data protection laws. |              |                                     | ✓                                 | ✓ (including compliance with related regulatory guidance and best practice)                              |
| s) | Resolving any complaints from or disputes with you  |              | ✓<br>(if with you as an individual) |                                   | ✓<br>(to try and resolve any complaint or dispute you might raise with us and to deal with legal claims) |
| t) | Personal safety and security and to safeguard the property  |              |                                     | ✓                                 | ✓<br>(CCTV in operation, for personal safety and security purposes)                                      |
| u) | For our marketing purposes  |              |                                     | ✓                                 | ✓<br>(to showcase our properties and/or your experience with us)   |

We may also convert your personal data into statistical or aggregated form to better protect your privacy, or so that you are not identified or identifiable from it. Anonymised data cannot be linked back to you. We may use it to conduct research and analysis, including to produce statistical research and reports.

## 5. Sensitive Information

- 5.1 'Sensitive Information' is information that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, genetic data, biometric data for the purpose of uniquely identifying someone, data concerning health or data concerning someone's sex life or sexual orientation.
- 5.2 Please see the section entitled 'sensitive information collected through the website' in the Website privacy notice: <https://www.annington.co.uk/privacy-policy/>.
- 5.3 Some of the processing described in the above table will include the processing of 'special categories of personal data' and/or sensitive personal data (together, "**Sensitive Information**" – as set out in the table at **paragraph 3**, above). This refers to sensitive or special categories of personal data which we are required to process with more care, according to applicable laws.
- 5.4 We will only process Sensitive Information in relation to you:
- (a) in respect of access to property or reasonable adjustments, where this is required by law or with your explicit consent;
  - (b) in respect of Events, with your explicit consent;

- (c) in relation to any vulnerability (as defined by the Financial Conduct Authority) which an individual (or occupiers of the property, which may include persons under the age of 18) may have; or
- (d) in relation to right to rent checks, some information you provide (for example, a copy of your passport) may include Sensitive Information, such as information that reveals your race and/or ethnic origin.

## 6. **Who do we share your personal data with, and why?**

Sometimes we need to disclose your personal data to other people.

We are part of a group of companies. Therefore, we will need to share your personal data with other companies in the Annington group (for example, for shared services/division of functions) and our parent company group for key parental decision making and reporting purposes. Where any group companies process your personal data on our behalf (as our processor), we will make sure that steps are taken to protect the confidentiality, security and privacy of your personal data.

From time to time we ask third parties to carry out certain business functions for us, such as property management, property maintenance, property sales, marketing, agency services and IT services or support. These third parties will process your personal data on our behalf (as our processor). We will disclose your personal data to these parties so that they can perform those functions. Before we disclose your personal data to these third parties, we will seek to ensure that they have appropriate security standards in place to protect your personal data. Examples of these third party service providers include our providers of IT systems software and maintenance, back up, and hosting services, property managers and estate and/or letting agents.

In certain circumstances, we will also disclose your personal data to third parties who will receive it as controllers of your personal data in their own right (for the purposes set out above). Please see the section entitled 'who do we share your personal data with, and why?' in the Website privacy notice: <https://www.annington.co.uk/privacy-policy/>.

The Website privacy notice also explains how we may use your personal data to create aggregated or anonymised data and we may use such data for the above purposes. Such aggregated or anonymised data may also be shared with other parties as explained above and below. In addition, we may also share your personal data with the following third parties:

- (a) to property managers and estate and/or letting agents;
- (b) to Event organisers in relation to your attendance (or apologies) for an Event;
- (c) relevant public bodies in relation to compliance with laws and regulations including for building safety purposes; and/or
- (d) actual or potential investors or funders of Annington and/or actual or prospective buyers of Annington assets, businesses and/or companies and/or their related professional advisers.

## 7. **Where in the world is your personal data transferred to?**

Please see the section entitled 'where in the world is your personal data transferred to?' in the Website privacy notice: <https://www.annington.co.uk/privacy-policy/>.

**8. How do we keep your personal data secure?**

We will adopt security measures to provide appropriate protection for your personal data from unlawful or unauthorised processing and accidental loss, destruction or damage.

**9. How long do we keep your personal data for?**

Please see the section entitled 'how long do we keep your personal data for?' in the Website privacy notice: <https://www.annington.co.uk/privacy-policy/>.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure, the purposes for which we process your personal data, and any applicable laws or regulations.

We may in the future implement retention guidelines (and include a link to them here) which will set out further details about the period for which we keep records of your personal data. Please check back here from time to time if you would like to know more about retention.

**10. How do we communicate with you**

Please see the section entitled 'how do we communicate with you' in the Website privacy notice: <https://www.annington.co.uk/privacy-policy/>.

In addition, we may email you with important updates and information in respect of your premises, including in relation to fire safety.

**11. What are your rights in relation to your personal data and how can you exercise them?**

Please see the section entitled 'what are your rights in relation to your personal data and how can you exercise them?' in the Website privacy notice: <https://www.annington.co.uk/privacy-policy/>.

**12. Updates to this notice**

We may update this notice from time to time to reflect changes to the type of personal data that we process and/or the purposes for which and/or the way in which it is processed. We encourage you to check this notice on a regular basis.

**13. Where can you find out more?**

If you want more information about any of the subjects covered in this privacy notice or if you would like to discuss any issues or concerns with us, you can contact us in any of the following ways:

By email at: Dataprotection@annington.co.uk

By telephone at: 020 7960 7500

By post at: The Data Protection Lead, 1 James Street, London, W1U 1DR

October 2023