Privacy and data Policy

John Winter's policy on collection and use of your personal information

To manage your Occupation Contract (*a student tenancy agreement under the Renting Homes (Wales) Act 2016*) professionally and to provide you with a high-quality service, we collect and securely retain limited personal information about you ("your data").

1. What personal data do we collect?

We collect only the minimum data necessary to provide our services.

Prospective tenants – basic contact information:

- Name
- Telephone number
- Email address
- Social media handle (e.g. Facebook or Instagram profile)

Tenants who have signed an Occupation Contract – additional information:

- Includes the above, plus:
- Date of birth
- Non-term time address
- Emergency contact number
- Institution and course of study, including course duration
- Bank account name, sort code and account number (only where necessary to reconcile rent payments)

2. How is your data held?

Your data is stored securely in electronic systems. Where data is stored digitally, it is protected using industry-standard encryption protocols (such as AES encryption at rest and TLS encryption in transit). These systems comply with the requirements of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Access is restricted to authorised staff members and is granted only where necessary to carry out the services described in this policy.

3. Lawful basis for processing your data

We process your data under the following lawful bases as defined by Article 6 of the UK GDPR:

- Contractual obligation – to manage your Occupation Contract
- Legal obligation – to comply with housing, tax, or regulatory requirements
- Legitimate interest – to manage communication, maintenance, and operations efficiently
- Consent – for marketing communications, which are limited strictly to relevant information about your current or future tenancy with us

We do not sell or share your data for third-party marketing purposes.

4. When do we share your data?

We only share your data when strictly necessary for tenancy management or legal compliance. Examples include:

- Utility providers
- Maintenance contractors
- Professional service providers (e.g. accountants or legal advisors)
- Government or regulatory authorities, where required by law
- Your data is never shared for marketing or commercial purposes.

5. How long do we keep your data?

We retain your data for the duration of your Occupation Contract and for up to six years after it ends. This enables us to meet our legal, financial, and record-keeping obligations and to respond to any disputes if they arise.

6. Your rights under UK GDPR

As a data subject, you have the right to:

- Request access to the personal data we hold about you
- Ask us to correct inaccurate or incomplete information
- Request the deletion of your data (where legally permitted)
- Object to or restrict certain types of processing
- Withdraw your consent for marketing communications at any time

To exercise any of these rights, please contact us at **info@johnwinterhouses.co.uk**