

In order to conduct your Occupation Contract with us in a professional manner and to provide you with a quality service, it is necessary for us to collect and retain some personal information about you ('your data').

1. What data do we hold on you?

We aim to collect and safely retain the minimum amount of data possible on our customers or prospective customers. The data we collect is limited to:

Prospective customers - 'basic information':

- Name, telephone number, email address, social media handle (e.g. Facebook username or Instagram profile name)

Customers who have signed an Occupation Contract with us - 'enhanced information'

- 'Basic information' as for prospective customers above, plus:
- Date of birth, non-term time address, emergency contact number, institution of study, course of study and course duration
- Bank account name, sort code and account number associated with rental payments made to us where necessary, for the purposes of reconciling payments received against your payment history.

2. How is your data held?

Your data is held securely in electronic systems with 128-bit SSL encryption and in accordance with the DPA and the GDPR Regulation 2018. Access to the systems in which your data is held is restricted to essential staff only and only for the expressed purposes herein.

3. Why is your data held by us?

Your data may be collected for the expressed purpose of marketing our services to you and/or providing you with the service you expect from us as a tenant in a John Winter house only. Your data is collected and retained solely for internal use, for use in engaging necessary third-parties to provide you with services relating to your Occupation Contract or the property which you have rented or will be renting from us, and where it is required of us by law to pass your data to an appropriate authority.

4. Your consent for us to hold your data

If you submit a property enquiry to us, you consent to us retaining your information for the purposes of offering accommodation to let of the type you have enquired about. We will not use it for any other purpose. If you enter into an Occupation Contract with us, you consent to us retaining and using your information for the purposes described herein.

5. How is your data used?

If you have provided us with your email address and/or telephone number by way of submitting a property enquiry, these may be used for contacting you in reply to your enquiry or later to offer other properties to let. Your details will be retained only for as long as we have suitable properties to let for the academic year for which you have made an enquiry.

If you have contacted us via social media, on the assumption that you have expressed an interest in our social media engagement, your social media handle may remain linked to our social media presence until such time as you dissociate your link with us (i.e. by 'unfriending').

If you have entered into an Occupation Contract with us, your information may be used in the following ways only:

- For direct contact by ourselves in relation to your Occupation Contract - e.g. start/end date, arrangements for keys, advising of management or contractor visits, notification of inspections or prospective viewings
- Basic information only: For the purposes of contact by our third-party contractors for arranging access for specific maintenance work required at the property you rent from us and/or requested by you.
- For informing the local authority of your Occupation Contract at the property you have rented from us, and for verifying your identity or full-time student status for the purposes of assessment for exemption from Council Tax (basic and essential enhanced information only).
- For informing utility suppliers for the property you have rented from us of your Occupation Contract (basic information only)
- For accurate internal reconciliation of payments received against your individual payment record.
- Your data may also be used to inform your designated emergency contact if we are unable to contact you, or if something happens to you that we need to notify a family member of under our duty of care to you.
- Your social media handle may be used for the purposes of creating group messaging 'chats'

with the other parties to your Occupation Contract for maintaining ready communication.

- Although highly unlikely, there are times where we may be required to pass your data to law enforcement if approached in the course of a criminal investigation. In such cases, we are legally obliged to do so.

Your data will not be passed to other parties on your Occupation Contract, marketing companies or other third party organisations without your expressed consent.

6. Linking of information / records attached to your data

For customers who have signed an Occupation Contract agreement with us only - we may link information relating to your time as a Contract-Holder with us to your personal information - this is limited to such information as rental payment record, record of maintenance reports, and, on very rare occasions and only where necessary, a record of any personal issues affecting your Occupation Contract which you have reported to us. We may also link your current information back to previous data held on you, for instance, where you have been a tenant with us previously.

7. References

Future landlords / letting agents are likely to request information on you for the purposes of conducting a reference relating to property you have proposed to rent after your Occupation Contract with us comes to an end.

It is our policy not to disclose this information without your explicit consent; if you are expecting a reference to be given by us, you must contact us to give your consent for us to respond to such requests. In responding to reference requests, only essential basic information sufficient to verify your identity, the duration of your Occupation Contract, and an overall statement on your payment history will be given.

8. How can I see what information is held on me by John Winter?

You can request a copy of the information held on you by contacting the Data Controller at lettings@johnwinterhouses.co.uk. A copy of the information held will be provided within 28 days.

9. How long is my data retained for?

If you have entered into an Occupation Contract with us, your data is held for a period of three years from the end of your last Occupation Contract with us, in order to allow us to link to any future Occupation Contracts you may have with us. This period is calculated on the basis that it is unlikely you would remain studying in Cardiff for longer than a total of five years (one in University accommodation, four in private rented accommodation).

If you do not take up an Occupation Contract with us in the academic year following a property enquiry you have submitted, your data is deleted after we have let all accommodation for the academic year for which you have enquired.

10. Use of your data by third-party organisations

By providing us with your data, you accept that John Winter Student Houses does not have control over how your data is used after it has been transferred to third parties in the necessary course of administering to your Occupation Contract. We cannot accept liability for third-party misuse of your data, and would recommend you inspect the equivalent 'use of your data' policies of these third parties.