



PRIVACY NOTICE

Fresh Property Group Limited (Fresh)

Of 3rd Floor, 7-9 Swallow Street, London W1B 4DE, including company brands Fresh Student Living and Five Nine Living, is committed to protecting and respecting your privacy. Fresh is committed to the protection of the Personal Data that we Process about you in line with the data protection principles set out in the European Union General Data Protection Regulation 2016 (“GDPR”) and any implementing law in the UK. As a property managing agent, Fresh is the data controller for the purposes of the GDPR in instances where you make an enquiry with us, and the joint data controller, along with the landlord of the property, when you live in one of the properties we manage.



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WHAT INFORMATION DO WE COLLECT ABOUT YOU?

Information you give us

You may give us information about you by filling in forms on our websites freshstudentliving.co.uk, freshstudentliving.ie, fivenineliving.co.uk or freshpg.com (our sites) or by corresponding with us by phone, e-mail or otherwise.

This includes information you provide when you register to use our site, subscribe to a service, search for a product or service, place an order on our site, participate in discussion boards or other social media functions on our site, enter a competition, promotion or survey, and when you report a problem with our site.

Data received in the course of an enquiry about our accommodation

The information you give us includes:

- Name
- Telephone number
- Email address
- Date of Birth
- Gender
- Home Address
- Home Country
- Language
- Course information (Faculty, Study Year)*
- University*

*Fresh Student Living only

We use your name, address, email address and contact details to contact you about the enquiry you have made. We need to know your date of birth, course information and University to ensure that you are eligible to enter into a Tenancy Agreement and for our student properties to find the most convenient

property for your place of study. We use your gender information to ensure that any preferences in this regard are catered for in shared accommodation. We use your language and home country information as we can in some cases provide services in your own language and we need to know this to check your right to reside.

Data received from customers who make a booking

Once you have a signed Tenancy Agreement, we require the below information so that we can both fulfil our contractual obligations to each other including details of any disabilities that you may have.

- Name
- Telephone number
- Email address
- Date of Birth
- Gender
- Home Address
- Home Country
- Language
- Bank Details (For Refunds)
- Medical Conditions (Where Applicable)
- Any details relating to contractual disputes.
- Guarantor Information – Name, Address, Telephone, Email
- Credit Checks **
- Landlord references and employers references
- Email Comments Relating to the Individual
- Complaints



We also collect the following information about you to comply with statutory requirements to make sure you have the right to stay in our accommodation including the right to reside and council tax exemptions for students.

- **Visa Number / Right to Reside checks**
- **UCAS Number***
- **Course Information (Faculty, Study Year)***
- **University***

In case of emergency and we need to contact someone close to you we keep a record of next of kin information – name, address, telephone, email.

*Student Accommodation only

**Non-Student Accommodation only

Information we collect about you

We will store cookies on your device should you consent to us doing so.

To ensure the safety of all of our residents, visitors and staff we capture and record CCTV images at different locations around our buildings.

Cookies

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity. We collect Cookies under the following circumstances:

- **Cookies for analytics, such as Salesforce's Pardot module, Google Analytics or Facebook.**
- Cookies set when you fill forms e.g. contact

us.

- **To track user authentication when a user logs in to a web application.**
- **To track any order you make with us.**

You will be asked to consent to cookies being stored on your device when you first visit our website. You will also have an option to block cookies being used at this stage.

You can also set your browser not to accept cookies and the below websites tell you how to remove cookies from your browser. However in a few cases some of our website features may not function as a result.

For further information visit www.aboutcookies.org or www.allaboutcookies.org.

Information we receive from other sources

We work closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks like Zoopla and Rightmove, analytics providers and search information providers like Google, credit reference agencies) and may receive information about you from them.



HOW WILL WE USE THE INFORMATION ABOUT YOU?

We use information held about you in the following ways:

Information you give us

We will process this information on the following legal bases under [Article 6 of the General Data Protection Regulation \(GDPR\)](#):

Data received as a result of an enquiry about our accommodation

We log the data provided in the course of an enquiry electronically and contact you if there are properties available. We also record details of conversations between us about your enquiry so that the relevant members of the team at Fresh Property Group understand your enquiry.

This will include the scheme about which you initially expressed an interest and others in the same area. We may continue to contact you for the duration of the period about which you enquired whenever something suitable becomes available and for one year afterwards. We will also use your information to give you the opportunity to re-book your property at the end of your tenancy.

Fresh has a legitimate interest in processing this information for purposes of marketing the property where the enquirer is looking for accommodation.

We will seek your formal consent if we wish to retain personal data for marketing purposes beyond the current and next academic year for student properties and for one year for non-student residential properties. We would also like to send you information about products

and services of ours and other companies in our group, which may be of interest to you. We will gain your consent to do so, and you may opt out at any time.

If you no longer wish to be contacted for marketing purposes, please click [here](#).

Data received from customers who make a booking

If you make a booking, we record the information on our tenant database. This information is used to contact you about the services that we provide to you as a tenant.

Our staff have access to this data to make sure that all parts of the Tenancy Agreement are fulfilled including the provision of services and the payments for these services. We may also share this information with third parties including contents insurance providers and our security partners. The legal basis for processing this information is for the performance of contract.

We will use your data for internal reporting, analysis and financial reconciliation purposes to ensure that we can manage the buildings effectively. We have a legitimate interest to do so in our role as property managers.



SHARING OF YOUR INFORMATION

We may share your information with selected third parties including:

- **Public bodies such as the local council, Home Office or the police. The legal basis in these cases is compliance with a legal obligation.**
- **In case of an emergency we may also share your information with the relevant public services, and contact your next of kin. The legal basis for processing in such cases is your own vital interests.**
- **During any public health or infection outbreak, we may share limited personal information with other residents to enable them to take appropriate action to safeguard themselves.**

We may also share your information with the following third parties for performance of our contract with you:

- **Contents insurance providers**
- **Our security provider**

For our own legitimate business interests we may share your information with the following categories of 3rd parties:

- **Debt collection agencies and Universities for the purposes of collecting any arrears.**
- **Analytics and search engine providers that assist us in improving and optimising our site.**
- **Buyers of any building managed by Fresh Property Group where the building is in the process of being sold as part of a due diligence process.**

Where we store your personal data

We have an accounting operation in India, which we use to process financial information and to prepare accounts. India is not a country in respect of which there is a European Commission decision of adequacy. Therefore, we protect your privacy and your rights through the use of the European Commission's standard data protection clauses.

More information about these is available here: <https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX:32010D0087>

All information you provide to us is stored on secure EU-based servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access



Your rights

The GDPR provides you with certain rights in relation to the processing of your personal data, including to:

- **Request access to personal data about you** (commonly known as a “**data subject access request**”). This enables you to receive a copy of the personal data we hold about you, and to check that we are lawfully processing it.
- **Request rectification, correction, or updating to any of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request personal data provided by you to be transferred in machine-readable format (“data portability”).**
- **Request erasure of personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove personal data where you have exercised your right to object to processing (see below).
- **Request the restriction of processing of your personal data.** This enables you to ask us to suspend the processing of personal data about you (e.g. if you want us to establish its accuracy or the reason for processing it).
- **Object to the processing of your personal data in certain circumstances.** This right may apply where the processing of your personal data is based on the legitimate interests of Fresh, as explained above

These rights are not absolute and are subject to various conditions under:

- **applicable data protection and privacy legislation; and**
- **the laws and regulations to which we are subject.**

If at any time you decide that you do not want to be contacted for any purpose, including marketing, or if you would like to exercise any of your rights as set out above, you can contact us by [email](#).

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

In addition to the above, please note that you have the right to make a complaint at any time to the [Information Commissioner's Office](#) if you are concerned about the way in which we are handling your personal data



HOW LONG WILL WE RETAIN YOUR INFORMATION?

We will retain your information for the following periods:

Data received in the course of an enquiry about our accommodation

All information will be retained until the end of the booking period about which you enquired and for one year thereafter, unless you ask us not to contact you anymore. Consent will then be sought and refreshed annually.

Data received from customers who make a booking

Customer information has the following retention periods:

- **Bank details/next of kin Info - maximum 1 year after tenancy end.**
- **Guarantor information – maximum of 1 year after the tenancy ends or after all charges are paid, whichever is later.**
- **Visa/UCAS Number - 2 years after the tenancy ends. This data is retained in case there is a Home Office audit.**
- **All other data - 6 years, for tax, audit, council tax exemption & reporting purposes.**

CCTV images

- **No less than 28 days and no more than 31 days on a rolling basis.**

Changes to our privacy notice

Any changes we may make to our privacy notice in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy notice. This version was updated on 19/6/2020.

Other websites

Our website contains links to other websites. This privacy notice only applies to this website so when you proceed to other websites you should read their own privacy policies.

Contact

Questions, comments and requests regarding this privacy notice are welcomed:

- by [email](#).
- or write to us as, Fresh Property Group, 7-9 Swallow Street, London W1B 4DE