

## Privacy Notice

Effective: 7 May 2019

At Hattington Student Housing Limited or Hattington Student Housing 2 Limited (“**Hattington**”, “**we**”, “**us**”, or “**our**”) we are strongly committed to transparency, and we want you (“**you**” or “**your**”) to understand how we collect, use, share and protect your information. This Privacy Notice (“**Privacy Notice**”) describes how Hattington handles information in connection with its student accommodation services (the “**Services**”). Please also read our Terms of Residence and Licence to Reside which sets out the terms governing the Services.

### **The Types of Information We Collect**

When we provide the Services, we collect or receive information in different ways. The types of information we collect or receive depends on how you use and interact with our Services. In some cases, you can choose what information to provide to us, although certain information is required in order for us to provide the Services. We use this information for the purposes that are described further below.

- We collect information when you **make an enquiry about our accommodation** and **when you make a booking**. For example, we collect information such as your name, e-mail address, telephone number, gender, date of birth, , specific student information such as student number, faculty, study year, and university or institute of education, payment information such as your payment details, next of kin information such as name, address, email address and telephone, guarantor information such as name, address, e-mail address and telephone and photographic proof of identity(if applicable). In certain cases, we will collect some of this information from your university or institute of education.
- When you ask for support or other assistance, we may keep information about your engagement with our support services.
- We capture and record **CCTV images** at different locations around our buildings to ensure the safety of all our residents, visitors and staff.
- If voluntarily disclosed or required by law, information about your health or disability status (which are considered to constitute special categories of personal data) that is required to ensure appropriate room allocation.

The provision of certain personal information is mandatory for contractual reasons (and may be required under applicable law or in accordance with a contractual requirement). The collection of any such information will be made clear at the time of collection of the information. If you choose not to submit this information, this may result in you being unable to avail of some or all of the Services.

### **How We Use Information**

We use your personal information for the purposes described below. In doing so, we rely on a number of separate legal bases to lawfully process such information.

We process your personal information where it is necessary to perform our contractual obligations with you. In particular, we process your personal information to:

- provide the Services to you and perform our obligations in accordance with the Terms of Residence for non-students and Licence To Reside;

We also use personal information, where necessary, to comply with a legal obligation, including, for example, health and safety obligations, and other requests from government or other public or regulatory authorities.

- We use your personal information to pursue our legitimate interests in line with the above mentioned purposes and these legitimate interests include the following: **communicate with you or with your university or institute of education** about your enquiry or booking, including communications about changes to our policies, and marketing communications such as surveys and updates about enhancements to our Services, where you have not objected to receive such communications;
- **Optimize, develop and improve our Services.** We may use your personal information to prepare management reports to understand business needs and identify areas for improvement.
- **Safety and security:** We process your personal information for safety and security purposes as necessary to protect Hattington, our staff and residents against security risks of all types, to protect our property, to deter crime and to investigate any security incidents or accidents. For example, we protect our buildings using CCTV and physical access restrictions.
- **Legal Process:** We process your personal information to enforce compliance with our Licences to Reside and to establish, preserve or defend our rights in court.

We also use personal information for the purpose below to protect the vital interests of our residents:

- **Emergencies, and health and safety:** We will process your information in order to contact you or your next of kin in the case of an emergency. We may also need to use your personal information to protect and maintain the health and safety of others.

### Who Do We Share Your Information With?

We share your information with the affiliated companies in the Hattington family of companies, our service providers, and other third parties where it is necessary to perform the Services or for any other purposes described in the Privacy Notice. In particular we share your information with:

**Our service providers and partners:** We share your information with our trusted service providers and partners who provide services to Hattington. For example, we share information with the third party managers of our student accommodation services.

**Universities and institutes of education:** We share your information with your university or institute of education in respect of your Licence to Reside and where they act as your guarantor. For example, we may share information if you breach our policies or your obligations under your Licence to Reside.

**Government, regulatory and law enforcement agencies:** We may share your information if we believe in good faith that it is reasonably necessary to do so for legal reasons (including to meet regulatory or local law requirements) or to detect, investigate, prevent, and address fraud and other illegal activity, security, or technical issues or to prevent harm or injury to you, members of the public, our staff, other third parties, or ourselves; or if we need to do so to defend our legal rights or property, to take action regarding illegal activities or traffic offences, or to enforce our contracts, such as our [Terms of Residence](#) for non-students and Licence to Reside.

**Hattington affiliates:** We may share your information with Hattington affiliate companies to help provide, maintain and improve the Services. As we grow, we may expand our corporate family by establishing local subsidiaries or other affiliates as needed, to help us provide or market the Services.

**Business re-organisation:** We may also share your information as part of a sale, merger, change in control, or in preparation for any of these events.

## **How long we keep your information**

We will keep your information for no longer than is reasonably necessary for the purposes set out in this Privacy Notice or as needed to provide the Services to you or to perform our contract with you. We will retain and use your personal information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your personal information to comply with applicable tax/revenue laws), to resolve disputes and to enforce our agreements. Please note that on the termination of your Licence to Reside with Hattington, we may continue to retain your personal information for these purposes.

Generally, we will only retain CCTV footage for one month however we may retain CCTV footage for longer periods for reasons including, but not limited to, when there has been a theft or break-in, the footage is subject to an investigation, or it is necessary for the defence or pursuit of a legal claim.

## **The Steps We Take To Keep Information Secure**

We maintain appropriate technical and organisation measures to protect against accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to your information. We provide a level of security that is proportionate to the risks that are presented by the processing activity, having regard to the state of the art, the costs of implementation and the nature, scope, context and purposes of the processing.

## **Your Rights**

You have certain rights as a data subject in relation to your information. You have the right to access, rectify, port, erase and restrict your personal information. These rights may be restricted in certain circumstances such as where processing is necessary to comply with our legal obligations or for the establishment, defence or exercise of legal claims.

You also have the right to object to certain processing of your information. This includes the right to object to our processing of your information where we are pursuing our legitimate interests or those of a third party.

Please get in touch with us as set out in the Contact section if you would like to exercise any of these rights or in case you should have any concerns about how we process your information.

## **Contact**

In relation to data concerning residents at Highlight Thomas Street, 30 & 32-36 Thomas Street, Dublin 8, Hattington Student Housing Limited is the controller responsible for your information, which you can contact by email at [info@hattington.com](mailto:info@hattington.com) or by post at:

Hattington Student Housing Limited  
23-23 Old Burlington Street, 4<sup>th</sup> Floor  
London W1S 2JJ  
United Kingdom

In relation to data concerning residents at Highlight Parkgate, 43-53 Montpelier Hill, Dublin 7, Hattington Student Housing 2 Limited is the controller responsible for your information, which you can contact by email at [info@hattington.com](mailto:info@hattington.com) or by post at:

Hattington Student Housing 2 Limited  
23-23 Old Burlington Street, 4<sup>th</sup> Floor  
London W1S 2JJ  
United Kingdom

You also have the right to lodge a complaint with your local data protection authority. The contact details of the Data Protection Commission are as follows: Data Protection Commission

21 Fitzwilliam Square South  
Dublin 2  
D02 RD28  
Ireland

Telephone: +353 578 684 800  
+353 761 104 800

Webform: <https://forms.dataprotection.ie/contact>

### **Privacy Notice Updates**

We reserve the right to change this Privacy Notice from time to time. If we make changes that are material we will notify you either by prominently posting a notice of such changes before they take effect or by directly sending you a notification.

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