

# PRIVACY POLICY

Tenants Plus Ltd (TPL) takes your privacy very seriously. We ask that you read this Privacy Policy carefully as it contains important information about what to expect when we collect personal information about you, including how we will use your personal data and the steps that we take to ensure that it is kept safe.

TPL shall process all personal information in accordance with data protection legislation and regulations relating to the processing of personal data and privacy, including but not limited to the General Data Protection Regulation (EU) 2016/679).

TPL is responsible as 'controller' of personal information for the purposes of those laws.

## **What personal information do we collect about you?**

In order to provide you with our services and for other lawful reasons related to the legitimate interests of TPL, we may collect some or all of the following personal information about you.

**Information you provide us:** personal Information that you provide to us, such as when using the registration or contact form on our website, including your name, email address, and other contact details;

**Our correspondence:** if you contact us, we will typically keep a record of that correspondence;

**Information about how you use our products and services:** using Google Analytics, CrazyEgg and other software we collect information about the amount of time you use our website, your typing and browsing patterns, the pages you visit, and other information about your activities while using our service or while logged into our website. We collect this in order to improve the user experience of our website, to further develop our services, and to understand what your usage patterns and preferences are so that our future marketing is relevant to our users;

**Survey information:** we may also ask you to complete surveys that we use for research and service improvement purposes. In such circumstances we shall collect the information provided in the completed survey;

**Device Information:** such as information about your operating system, browser, software applications, IP address, geolocation, security status and other device information in order to improve your experience, to protect against fraud and manage risk;

**Website and communication usage:** details of your visits to the websites and information collected through cookies and other tracking technologies including, but not limited to, your IP address and domain name, your browser version and operating system, traffic data, location data, web logs, other communication data, and the resources that you access;

## **How will we use your personal information?**

In this section, we set out the purposes for which we use your personal information that we collect via our website and, in compliance with our obligations under European law, identify the “legal grounds” on which we rely to process the information.

We will primarily use your personal information that's collected at the point of registering on our website to provide our services and products to you.

**Your name and contact details:** are used as part of the online referencing and credit check application process which is undertaken by FCC Paragon. Your personal details may also be used when contacting landlords and agents on your behalf in order for them to arrange and conduct viewings of properties with you as per the service specification.

**Your email address:** is primarily used along with a password as part of our website login process so that you can login to our website, view and amend your personal information. Your email address is also used for email notifications and updates about the service you have requested from Tenants Plus and may include notifications from our referencing partner at that time.

**Sharing outside Tenants Plus:** for the purposes of delivering the online referencing and credit check application process, your personal information may be provided to third parties who undertake and manage this service on our behalf. We currently use FCC Paragon. You can view their privacy policy here: <http://fccparagon.com/privacy/>.

In unlikely cases, your personal information may also be shared with anti-fraud organisations, legal, regulatory or law enforcement authorities in cases of suspected criminal activity within our website.

**Processing of payments on our site:** when you submit a payment request on our site, we pass your payment information (including, the current transaction, your email address, credit card details and IP address) to a third party service provider (Stripe <https://stripe.com/gb/privacy>) which conducts anti-fraud checks on our behalf. Our online payment service merely queries whether the payment information provided by you satisfies the criteria set by Stripe's algorithm and then returns back the results. If your payment information does not satisfy Stripe's criteria, the payment request is declined.

We may also use your personal information for one or more of the following purposes:

**(a)** to communicate with you about services or products you have requested from us: for example, in the event that the service or product you have requested is unavailable; or if there is a query or problem with your requests; or when (in accordance with your preferences) we keep in touch with you about similar services or products;

**(b)** to fulfil our legal obligations (for example, where we are required to keep records of transactions or share information with authorities);

**(c)** to improve the quality of our services;

We may also use aggregate information and statistics for the purposes of monitoring website usage in order to help us to develop our website and our services. We may also provide such aggregate information to third parties, but these statistics will not include information that can be used to identify you.

## **Disclosure of your personal information**

In order to provide our services and products, we may, occasionally, appoint other organisations to carry out some of the processing activities on our behalf. These may include, for example, technology hosts, printing companies and mailing houses. In these circumstances, we will ensure that personal information is properly protected and that it is only used in accordance with this Privacy Policy.

In limited circumstances, we may disclose your personal information to third parties if we are under a legal obligation to do so.

## **What if you do not want to receive marketing information?**

We consider it is in TPL's legitimate interest to keep you informed about what we and our partners offer. If you would rather not receive marketing information from us or any other third party to whom we may disclose your personal information, please contact us at [enquiries@tenantsplus.co.uk](mailto:enquiries@tenantsplus.co.uk)

If you agree to us providing you with marketing information, you can always opt out at a later date. You are in control of what you receive. However, please note that where you withhold or withdraw your consent to be contacted in this way, we may be unable to keep you informed of new services, products, or indeed provide the service you have previously requested.

## **Cookies and other information-gathering technologies**

Our website [www.tenantsplus.co.uk](http://www.tenantsplus.co.uk) uses cookies and browser session data so that we can customise your experience while using our service. For example, we temporarily store information about your username in order for you to login. Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. These cookies allow us to distinguish you from other users of the website which helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

## **Retention of personal information**

Our retention periods for personal data are based on business, service needs and legal requirements. We retain your Personal Information for as long as is necessary for the processing purpose(s) for which the information was collected, and any other permissible, related purpose. For example, processing your referencing application and to find landlords or agents who satisfy your property search preferences. We may also retain certain online transaction details and correspondence until the time limit for claims arising from the transaction has expired.

## **How we protect your personal information**

We use administrative, physical, electronic and procedural safeguards to protect against unauthorized use, access, modification, destruction, disclosure, loss or theft of your Personal Information in our custody or control.

We have agreements and controls in place with third party service providers requiring that any information we provide to them must be safeguarded and used only for the purpose of providing the service we have requested the company to perform.

## **Security over the Internet**

You should be aware that the use of the Internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal information which is transferred from you or to you via the Internet.

All information you provide to us is stored on our or our subcontractors' secure servers and accessed and used subject to our security policies and standards. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential and for complying with any other security procedures that we notify you of. We ask you not to share a password with anyone.

TPL are not responsible for the contents or policies of external websites and recommend that you check the privacy and security policies and procedures of every website that you use and submit your personal details to.

## **Access to your personal information and updating and correcting your personal information**

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please send an email [dataprotection@tenantsplus.co.uk](mailto:dataprotection@tenantsplus.co.uk).

We want to ensure that your personal information is accurate and up to date. If any of the information that you have provided to us at the point of registering on our site changes, for example if you change your email address, name or contact number, you can amend this information by visiting our website and accessing your account from here: <https://www.tenantsplus.co.uk/>.

You may ask us, or we may ask you, to correct information you or we think is inaccurate, and you may also ask us to remove information which is inaccurate or unnecessary. You have various other rights including the right to object to or restrict certain types of data processing, to withdraw consent where you have given it, to ask us to transfer your data to a third party, or to have your account with us deleted.

## **Your rights**

If you have any questions in relation to our use of your Personal Information, you should first contact us at [dataprotection@tenantsplus.co.uk](mailto:dataprotection@tenantsplus.co.uk). Under certain conditions, you may have the right to require us to:

- (a) provide you with further details on the use we make of your information;
- (b) provide you with a copy of information that you have provided to us;
- (c) update any inaccuracies in the personal information we hold;
- (d) delete any personal information the we no longer have a lawful ground to use;
  
- (e) where processing is based on consent, to withdraw your consent so that we stop that particular processing;
- (f) object to any processing based on the legitimate interests ground unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights; and
- (g) restrict how we use your information whilst a complaint is being investigated.

Your exercise of these rights is subject to certain exemptions to safeguard the public interest (e.g. the prevention or detection of crime) and our interests (e.g. the maintenance of legal privilege). If you exercise any of these rights we will check your entitlement and respond in most cases within a month.

## **Social media followers**

### **Interaction on social media**

If you follow one of our social media accounts, we receive basic personal data about you according to your profile: your account name, gender, general interests, location, age. You may also communicate with us directly and provide content in this way. Our legal basis for processing this data is our legitimate interest in providing social media and marketing content that is of interest to our followers on social media.

### **Data Uses**

This personal data will be used within the terms and functionality of the social media sites.

### **Data Sharing**

We are not responsible for the user terms or activities of third party social media sites. However, TPL will not sell your information nor permit others to do so. We will not share your personal information with any third party except as stated in this Privacy Notice or as required to operate our social media accounts, provide our services and/or products to you and/or administer your account.

### **Changes to Privacy Notice**

We keep our Privacy Notice under regular review. If we change our Privacy Notice we will post the changes on this page, where appropriate, place notices on other pages of the website and advertise on our social media platforms. Any material changes that affect how your personal data is used will be provided to you, so that you may be aware of the information we collect and how we use it at all times.

### **How to contact TPL or the ICO**

If you would like to contact TPL with any queries about our Privacy Notice, please send an email to [dataprotection@tenantsplus.co.uk](mailto:dataprotection@tenantsplus.co.uk) or write to us attention Data Protection at Tenants plus Ltd, 417, Finchley Road, Hampstead, NW6 3HJ

If you wish to raise a query with the Information Commissioner, you may do so at [www.ico.org.uk](http://www.ico.org.uk) or on 0303 123 1113.

This Privacy Notice was last updated on 21st May 2018.