

Student Privacy Policy & Procedure

At New Era Living Limited, we are committed to protecting the privacy and security of our residents customers and site visitors. Our team fully understand the importance of keeping your data secure and private.

This privacy notice therefore aims to be completely transparent about how we handle and use your personal data.

1. Who we are:

“New Era Living) Ltd” (referred to in this policy as “we”, “us” or “our”) is a trading name of:

New Era Living Limited

Office 2, 10 New Era Square

Sheffield

S2 4BF

Company number: 10850991

ICO Registration Number: ZA341766

How to contact us:

You can contact us in the following ways should you have any questions, complaints or feedback about your privacy:

Office 2, 10 New Era Square

Sheffield

S2 4BF

Email: lettings@nelstudents.com

Telephone: 0114 2729904

2. About this notice

This privacy policy has been set out with our customers, residents and guarantors in mind, and the ways in which you interact with us. For example, the information we collect if you book a room/apartment with us and how we use it will be different to if you only enquire about a room. When you stay with us, the type of data we collect and how it is used is different again.

This policy applies to all personal data collected in connection with:

- Accommodation applications
- Tenancy agreements
- Room allocations
- Welfare and safeguarding services
- Maintenance requests
- Security and access control systems
- Financial transactions
- Complaints and disciplinary matters

This notice does not cover:

- Statistical, aggregated or anonymous information
- Personal data collected by third party organisations outside of our instruction, or individuals or other websites. Where this is the case, we encourage you to read their privacy notice to understand how they are processing your data.
- If you have applied to work with us, you will be issued with an employment privacy notice

We have broken this notice down into different sections. Each section details the personal data we collect and what purpose, who we collect it from and who we share it with.

3. The personal data we process when you interact with us

When you interact with us via:

- Visiting our website,
- Telephone communication
- In person
- Social media platforms
- Messaging apps

We will collect the following data, depending on the platform:

- First name, last name
- Your contact details depending on how you reach us (i.e. phone number or email address), details about your enquiry, further information to identify you.
- Your activity on our website, behaviour, and interests including the pages you visit.
- Your name as it appears publicly on a social media platform, public profile image and message history
- The phone number you are calling from (unless this is withheld), the date, time, and duration of the call.
- WeChat ID and any other messaging platforms that you use including any information saved on these messaging platforms.
- An uploaded copy of your passport / visa details and/or driving licence

- Proof of your principal residence / home address

When you make an enquiry with us through WeChat we collect the following data:

- Customer name
- Address
- Telephone number
- Email

This data may be collected for the following purposes:

- Directly from you to communicate with you and respond to your enquiry, improve our service where we can and allow us to ask security questions to ensure we are speaking with the right person.
- Directly from you if you take part in any online surveys on our website and interact with website enquiry platforms

We work with third party booking agents outside of the EU to help us secure bookings. The safeguards in place to protect this restricted transfer of personal information of data are the European Commission's standard contractual clauses with the UK's international data transfer addendum. We also risk assessment to determine :

- Where data is stored.
- Which entities receive the data.
- Whether UK GDPR transfer requirements are satisfied.
- Whether additional technical or contractual measures are needed

Wechat should not be not used for:

- Safeguarding concerns.
- Mental health disclosures.
- Disability information.
- Medical information.
- Disciplinary cases.
- Financial information.
- Copies of passports, visas, or tenancy agreements.

Instead, we use secure systems or Microsoft 365 platforms.

4. The personal data we process when you book one of our rooms

When you book one of our rooms, depending on the type of booking, we will /may collect the following information from you or a group booking if booking direct, or from your university or a booking agent or on our Jotform application form. The data collected on the Jotform platform is stored securely on our systems and processed in line our data protection policy.

- Title, first name, middle name*, last name, preferred name
- Name address and bank details of your guarantor (if applicable)
- Mobile phone number
- Date of birth
- Gender
- Nationality
- University ID number
- Passport number
- Landline number
- Phone contact preference
- Current living status
- Email address
- Home address
- Year of study
- Name of university attending, course subject, course title
- Alternative email address, phone number and address
- Photo ID (passport or driving licence)
- Disability or medical information (if disclosed)
- Written communications between you and the agent
- Pre-sessional start/end date
- Course dates (for short-term lets)
- Arrival/departure dates
- Invoice address
- Preference of tenancy length, room type and roommate gender
- Budget per week

We may also collect Welfare and Support Information such as:

- Disability information
- Medical requirements
- Reasonable adjustment requests
- Safeguarding concerns
- Wellbeing support requests

We use this information to:

- Get you set up on our system and administer your tenancy (if applicable)
- Contact you about other products and services we think may be of interest to you (only where you have given your consent)
- Help you book a suitable room (for example to provide suitable accessible rooms to meet your requirements) or ensure you have the necessary aides, equipment or PEEP (Personal Emergency Evacuation Plan) for your stay
- Provide evidence to local authorities for council tax exemption or the provision of electoral roll services (if applicable)
- Register and protect your deposit, and send you your deposit protection certification (if applicable)
- Keep a record of what has been agreed with the agent and track referred customers for debt collection and commission purposes (if applicable)
- Visa / immigration requirements – we need to make sure that you have the right to stay in the UK for the duration of your stay with us
- We also need to make sure that we can identify and verify that the correct person has arrived and checked in. For the Student accommodation lets, we also need to know that you have the legal right to stay and study in the UK and that you are a registered student. This helps us in our legal obligations, to prevent fraud and helps us to keep all of our guests safe.

Depending on why we are using your data, we will share it with our internet service provider, your university or our third party security service looking after the property you will be staying at, the relevant local authority (council), our third party survey provider, property management company, our legal advisors, any tenancy deposit protection scheme being used and the emergency services (in the event of an emergency).

Special Category Data

We may process certain categories of sensitive personal information ("Special Category Data") where necessary for the provision, management and safeguarding of our student accommodation services. Special Category Data may include information relating to a resident's health, disabilities, accessibility requirements, religious beliefs, ethnic origin, or other information classified as special category data under the UK General Data Protection Regulation (UK GDPR).

We will only collect and process Special Category Data where there is a lawful basis for doing so and where one of the conditions set out in Article 9 of the UK GDPR applies. This may include where:

- You have provided explicit consent
- processing is necessary for health and safety purposes;
- processing is necessary to protect the vital interests of the resident or another person;
- processing is necessary for reasons of substantial public interest; or
- processing is required to meet legal obligations relating to equality, safeguarding, accessibility, or accommodation requirements.

Special Category Data will only be accessed by authorised personnel who have a legitimate need to know the information and will be protected through appropriate technical and organisational security measures.

As part of your application for accommodation, we ask whether you require accessible accommodation or other accessibility support. This information may reveal details about your health, disability, or care needs and is therefore treated as special category personal data.

What information we will process

We may collect and process information relating to:

- Your assisted living accommodation requirements;
- Accessibility or support needs;
- Information about a disability, health condition, or care requirements where you choose to provide it.
- During your stay, we may collect Special Category Data in order to formulate bespoke evacuation plans to suit your needs (PEEP). This information will only be accessed by authorised personnel and stored in line with this policy.
- During your stay, we may collect Special Category Data in line with our safeguarding, welfare and mental health and wellbeing policies. This information will only be accessed by authorised personnel and stored in line with this policy.

Why we need this information

We process this information solely for the purpose of:

- Assessing and arranging appropriate accommodation and support;
- Ensuring accessibility and reasonable adjustments where required;
- Meeting our legal and operational obligations relating to accommodation and support and wellbeing services.

How we will use and protect your information

Your information will only be accessed by authorised personnel who need it for the purposes described above. It will be stored securely and retained only for as long as necessary in accordance with our retention policy.

Your rights

You have the right to:

- Withdraw your consent at any time;
- Request access to your personal data;
- Request correction of inaccurate data;
- Request erasure of your data where applicable;
- Lodge a complaint with the Information Commissioner's Office (ICO).

Withdrawal of consent will not affect the lawfulness of processing carried out before consent was withdrawn.

Where Special Category Data is provided voluntarily to support reasonable adjustments, welfare support, emergency response arrangements, or specific accommodation requirements, we will use the information only for those purposes and will retain it only for as long as necessary in accordance with our retention policies.

You have the right to access, rectify, restrict, or object to the processing of their personal data, and where processing is based on explicit consent, to withdraw that consent at any time, subject to applicable legal requirements.

5. The personal data we process during your stay with us

Once you have moved into your new accommodation, we will collect and use other information from or about you depending on how you use our services and what happens during your stay with us. This includes:

- Your conversation history in Wechat, initials, tenancy address (if applicable) , phone number and location. This information may be shared with the other occupants of your apartment/room who have installed Wechat and third-party security services, if contracted for your building, if you report a lock-out or for other security related issues.
- Your name and room number on a parcel, to notify you of a delivery and for our internal parcel management records
- We monitor and record video recording of you in the property or an external area covered by our CCTV cameras. We use CCTV to prevent and detect criminal activity, fraud and misuse of or damage to our property and investigate any allegations, misuse or damage. Where and when used, body-worn cameras will record video and audio. We use these when undertaking safety and security tasks to reduce the risk to our employees and customers facing aggressive or threatening behaviour.
- Relevant account information and details of any accident or incident you are involved in that is reported to us. We use this to carry out an investigation and may also be given information by any third party that was also involved.
- Details about a concern regarding your health or wellbeing which you disclose to us. Where it is appropriate to ask for your consent and you choose to give it, we will share this data with an agreed

individual or organisation so they can (continue to) support you.

- Images of you if you attend one of our events which is filmed or photographed or are involved in one of our videos or photoshoots. These images could be used for internal presentations, our intranet and/or made public on our website and published promotional material.
- Data shared with our legal advisors and debt collection agency where applicable.
- Any health or medical relevant to health and safety and Personal Evacuation Plans

6. The personal data we process after your stay

If you need us to provide a reference after you move out, we will provide information relating to your tenancy as requested by the landlord or letting agent, with your consent. The information shared will vary depending on the reference request and may include tenancy start/end dates, tenancy address, weekly/monthly rent price, confirmation that your payments are up to date, and confirmation of any damage charges you have incurred. We may also need to contact you if you have left anything behind or if we have any queries about the property that you have been staying in.

7. The personal data we process if you are a guarantor, emergency contact or named person on the account

If you have agreed to be a guarantor, emergency contact or the named person for a customer, depending on your role, we will collect the following information from you, the person booking our services or the customer holding the account:

- Title, first name, last name
- Email address
- Contact phone number
- Relationship to customer
- Gender
- Date of birth
- Nationality
- Home address

If you are a guarantor or named person on the account, this may be used to:

- Prove you are 25 years or older, interested in the customer's wellbeing and have an existing relationship with them.
- Confirm your identity and respond to account-related queries
- Contact you and arrange payment if the customer has failed to make a payment. If referred after the tenancy has ended, we may share your data as the guarantor with a third-party credit collection company and our legal advisors
- Notify you if the customer has breached their tenancy agreement and subsequent updates
- Notify you of any unforeseen changes to the tenancy

If you are an emergency contact, in the event of an emergency, we will share your contact information with the medical or emergency services as necessary, enabling them to reach and update you about an incident affecting the customer

- **Bookings and payments** – we use your data to provide communications about bookings, products and services being provided to you (and others if their personal information is provided by you);
- **Booking updates** – send details of new, amended or cancelled bookings to you
- **Update you on matters affecting your booking** – contact you (and others if their personal information is provided by you) in the event of a change that affects a booking or any data or personal information you have provided us with, such as changes to terms and conditions of booking or this privacy policy;
- **Website service communication** – provide notifications of any changes to our website or to our services that may affect you (and others if their personal information is provided by you);
- **Lost property** – we keep a copy of your name, contact and address details on our secured system for 30 days after the end of your stay with us so that we can contact you if you have lost anything.
- **your photo ID – security and meeting our legal obligations** – We also keep a copy of your photo ID (only with your explicit consent – which we ask for upon check in) for 30 days after the end of your stay. This is to make sure that we can identify you and verify that the correct person has arrived to check in to our accommodation, this helps us to prevent fraud and helps to maintain the safety and security of our guests and our staff in the detection and prevention of crime. We need to make sure that the details on the ID match the details on your reservation. We also need to check that you are the correct age to check in and stay with us as you need to be over 18 years old.
- **Property damage or contractual dispute** - we will keep your contact data (name, address and phone number) on our systems for 30 days following the end of your stay so that we have the relevant required information in the event of damage to our property or another dispute relating to your stay.
- **Taxation** – ensure we meet our tax and other regulatory obligations;

9. Sharing your personal data when required by law

Our purpose for using your data may change where it is necessary to do so to protect or defend our legal rights or the legal rights of others. In these instances, we may disclose the information you give us /we receive in order to comply with the law and our regulatory obligations. This information will be used as necessary, including to investigate, prevent or take action regarding illegal activities, suspected fraud, or situations involving potential threats to the physical safety of any person.

If we sell our business, we will transfer information relating to tenants, occupiers, and guarantors to the new owner. If we sell a property only information relating to the current academic year would be transferred. In all instances we will ensure that your data is transferred securely.

10. Our Lawful basis for processing your data

Data protection law requires us to have a lawful basis for using your personal data. At least one of the following must apply: consent, contract, legal obligation, legitimate interest, public interest or vital interests. In this section we explain which one we rely on when we use your data in a certain way, as detailed in the previous sections.

We use your information for the performance of our contract with you:

- When you are in arrears or for any other contract breaches
- To notify you of a parcel delivery or other service-related message

- In order to fulfil our contract with you or to take steps to act in a way that is linked to our contract with you.
- In order to verify you and your ID
- To process and request payments

We use your information for legitimate business interests for the following:

- When you visit our website
- When you contact us with an enquiry, a complaint, or provide other feedback
- To use CCTV and body-worn cameras in and outside of our buildings
- When you contact our reception (which is covered by a third-party security company after 7pm)

To share your data with a debt collection company if you are in arrears

- We process personal information for the following purposes:
 - Managing accommodation applications.
 - Allocating rooms fairly and efficiently.
 - Administering tenancy agreements.
 - Processing payments and deposits.
 - Providing welfare and safeguarding support.
 - Responding to emergencies.
 - Maintaining property security.
 - Managing complaints and disciplinary matters.
 - Meeting legal and regulatory obligations.
 - Improving accommodation services.

We must have your consent to use your data for the following purposes:

- To process any medical, disability, health or wellbeing information we hold on you (only if disclosed)
- To use images of you taken at one of our events
- To provide a reference to a potential landlord or agency
- If you are from China, to transfer your data into the UK.

We have a legal obligation to use your information:

- As evidence to local authorities for council tax exemption or the provision of electoral roll services.
- To register and protect your deposit (if applicable)
- To ensure your room is safe for you and to assist you with a Personal Emergency Evacuation Plan (PEEP) (if applicable)
- As part of any accident or incident investigation and records involving you
- When you check in for a booking
- In order to amend or administer your booking
- To alert you to an emergency or an unforeseen incident in which we may need to contact you or to make alternative arrangements

Guarantor and emergency contact data: Our lawful basis for collecting your personal data will be performance of a contract (guarantor), legitimate interest (emergency contact) and consent (named person) and consent to transfer your data into the UK if you are from overseas.

11. How long we keep your information

The periods for which we keep your information will vary according to the purpose for which we use the information. To work out how long we keep each data record for, we consider why we hold it, how sensitive it is, how long the law says we need to keep it, and what the risks are.

Unless there is a specific legal requirement to keep your information, we will not keep it for longer than necessary for the purposes for which it was collected or for which it is to be further processed. We have an internal data retention schedule that details how long we keep each data record and we will securely delete your information in line with this.

We keep and securely store your tenancy agreement and financial information and check in form for 7 years, so that we can comply with our legal, tax and accounting requirements.

Any ID (eg. passports) taken upon check in will be deleted 30 days after the end of your stay.

Any accident reporting forms are kept for 3 years following the date of the accident

We keep CCTV recordings for 30 days (unless recordings are downloaded as evidence as required by law).

We keep any information and data in relation to queries and complaints to 1 year following the date that the complaint is made

Any information or personal data transferred via our website / IP address or web server is deleted after 7 days or for as long as necessary to process the enquiry

We may keep your personal data / images/ CCTV recordings for longer than this if it is required for the purposes of internal or external investigations, litigation, disputes or in compliance with the law in the UK. If the matter is escalated to the Police or to an insurance company, we may need to share this with them.

12. How we protect your information

We have several security measures in place to protect your information:

Personal data is stored in a secure system with restricted access areas depending on the type of data being stored. We have strict security procedures covering the storage and disclosure of this information in order to prevent unauthorised access. Our employees can only access data that is appropriate and necessary for their role and we carry out identity verification checks before disclosing any personal information.

Where we use third party service providers, we disclose only the personal information necessary for them to deliver the required services. We carry out security due diligence to ensure they have satisfactory security and confidentiality measures in place, and contracts are in place to ensure they only use it for the purpose for which it was intended.

13. Your rights in relation to your personal data

You have various rights relating to your personal data, which we have summarised below. To exercise any of these rights, please contact lettings@nelstudents.com. We process and respond to all requests regarding personal data within one calendar month, but if the request is going to take longer to process, we will advise you of this.

We may ask for additional information to verify your identity to ensure we are sharing personal data with the correct person or that we believe is necessary to comply with a request. Please note that whilst we will carefully assess every request we receive, we may not always have to comply. When this happens, we will explain why.

Your right to be informed

You have the right to be provided with clear, transparent and easily understandable information about how we use your personal data and your rights. Therefore, we are providing you with the information in this privacy notice.

Your right of access

You have the right to access the personal data we hold about you.

Your right to correct the personal data we hold on you

You have the right to correct, amend or update your personal data if it becomes inaccurate or incomplete.

Your right to erase your personal data

You have the right to ask us to erase your personal data although, for legal reasons, we might not always be able to do it.

Your right to restrict the processing of your personal data

You have the right to restrict, 'block' or suppress further use of your information if:

- the accuracy of your personal data is contested;
- your personal data has been processed unlawfully by us but you do not want to request erasure; or
- we no longer need your personal data for our original purpose but it is required to establish, exercise or defend legal rights.

When processing is restricted, we can still store your information but may not use it further. We keep records of people who have asked for further use of their information to be 'blocked' to make sure the restriction is respected in the future.

Your right to consent and/or withdraw consent

If you have given your consent to allow us to process your personal data, you also have the right to withdraw your consent at any time.

Your rights in relation to automated decision-making including profiling

Automated decision making is a decision made by automated means, without any human involvement, which has legal consequences or something to a similar effect (e.g. credit checking). We don't typically carry out automated decision making, but if we were to, we would make it clear where decisions are being made.

Your right to data portability

You have rights to obtain and reuse your personal data for your own purposes in a commonly used machine-readable format, and to have your personal data transferred to another data controller on your request.

Your right to object to processing

You have the right to object, on grounds relating to your situation at any time, to the processing of your personal data that is based on us exercising our legitimate interests. If we can show compelling legitimate grounds for processing your personal data which we consider override your interests, rights and freedoms, or we need your personal data to establish, exercise or defend legal claims, we can continue to process it. Otherwise, we must stop using the relevant information.

You have the absolute right to object at any time to the use of your personal data for direct marketing purposes.

Your right to make a complaint

If you are unhappy about the way in which we have used your personal data, please let us know by contacting us via lettings@nelstudents.com and we will try to resolve your complaint. If we are unable to resolve your complaint to your satisfaction, you have the right to lodge a complaint about

the way we handle or process your personal data with the Information Commissioner's Office at <https://ico.org.uk/>.

If we change the way in which we use or share your personal information we will send you a just-in-time notice or update this Privacy Notice. We will notify you of any significant changes and where necessary, will obtain your consent before using your personal information for any new purpose.

14. Updates to this Privacy Notice

We reserve the right to update this privacy notice at any time and will seek to inform you of any substantial changes. We may also notify you in other ways from time to time about the processing of your personal data.