

PRIVACY POLICY

This privacy policy sets out how and why Abodus Limited (registered in England with company number 08433108 and as a data controller with the Information Commissioner's Office under register number ZA139985) with its registered office at 5 Fleet Place, London, EC4M 7RD (**we, us** or the **Company**), acquire and use personal information in accordance with the General Data Protection Regulation (Regulation (EU) 2016/679) (the **GDPR**).

If you would like more information about us, please contact us on enquiries@abodusstudents.com www.abodusstudents.com (the **Site**) is operated by Abodus Student Living.

HOW WE COLLECT YOUR PERSONAL DATA

If you are a student registering on the Site and applying for accommodation (a **Student**), we collect personal data directly from you via the Site, including:

- a) your name, date of birth, gender, university, university ID, course, home and mobile telephone number(s), email address, level and year of study, home address and nationality; and
- b) information about you which we collect through the use of cookies (please see "use of Cookies" below for further detail).

We also ask you to upload a profile picture and collect information relating to your health. We collect this information from you when you enter it through our website and through your use of our website.

If you are a guarantor (a **Guarantor**) and/or **emergency contact** (an **Emergency Contact**) of a Student registering on the Site, we collect personal data from the Student via the Site including: your name, home address, home, work and mobile telephone number(s), your relation to the Student and email address.

We obtain this information when the Student provides it to us through our website and it does not come from publicly accessible sources.

If you are making a payment on the Site (**Payee**), we will collect your personal data via the Site including your name, billing address, bank details and email address.

We obtain this information when the Student provides it to us through our website and it does not come from publicly accessible sources.

HOW WE USE YOUR PERSONAL DATA

If you are a Student, we use the information we collect about you in order:

- a) to register you on the Site;
- b) to process your application for student accommodation;
- c) to contact you in relation to any queries that arise from your application;
- d) to carry out our obligations arising from any contract entered into between you and us (including your tenancy agreement);
- e) to ensure that content from our Site is presented in the most effective manner for you and your computer;
- f) to administer, monitor, support, improve and develop our Site; and
- g) for analytical and statistical purposes.

We ask for your profile picture for identification purposes when you move in and during your stay. We request (with your explicit consent) information about your health, which is a special category of personal data under the GDPR, so that we can cater to your medical needs during your tenancy.

If you are a Guarantor, we use the information we collect about you in order to contact you in relation to your obligations as a guarantor and to request payment from you if necessary.

If you are an Emergency Contact, we use the information we collect about you in order to contact you if an emergency situation arises involving the Student for whom you are an Emergency Contact.

If you are a Payee, we will use the information we collect about you in order to process payment of the deposit for the Student's application for student accommodation and to contact you.

OUR LEGAL BASIS FOR USING YOUR PERSONAL DATA

If you are a Student, your personal data on the basis that it is necessary for the performance of our contract with you (your tenancy agreement) or to take steps at your request prior to entering into your tenancy agreement or on the basis that we have a legitimate interest in using your information, so that we can identify you in order to maintain the security of our premises.

We use data relating to your health on the basis that you have given your explicit consent for us to do so (by way of a 'tick box' affirmation).

You do not have to provide your information but (except for data relating to your health) if you do not, we will not be able to process your application or allocate student accommodation to you.

If you are a Guarantor, your personal data will be processed, where necessary, for:

- a) the performance of our contractual agreement with you or to take steps at your request prior to entering into an agreement with you; and
- b) our legitimate interests, for example in contacting you in relation to your obligations as a guarantor and recovering payments from you if necessary.

If you are an Emergency Contact, your personal data will be processed, where necessary, for our legitimate interests or to protect the vital interests of the Student, for example in contacting you where there has been an emergency situation involving the Student for whom you are an emergency contact.

If you are a Payee, your personal data will be processed, where necessary, for our legitimate interests, for example in administering and processing your payment of the deposit for the student accommodation and in contacting you.

Where we process information on the basis that you have given your consent for us to do so you can withdraw your consent to us processing that information at any time by logging on to your account on our website at www.abodusstudents.co.uk and changing your preferences or emailing us at enquiries@abodusstudents.com. This will not have any effect on the lawfulness of any processing we have carried out before you change your mind.

WHO DO WE SHARE YOUR INFORMATION WITH?

- Other members of our group of companies; and
- Third parties which supply us with products and services, hosting our databases and collecting payment information and optimising our website.

We may also share your information with third parties where:

- a) where we need to share the information to provide a service you have requested;
- b) where we need to send the information to persons or organisation who work on our behalf to provide a product or service to you, but such persons or organisations may only use this information in order to provide such product or service and not for any other purpose;

- c) if we, or substantially all of our assets, are acquired by a third party, in which case Personal Data held by us about Students, Guarantors and Emergency Contacts will be one of the transferred assets; or
- d) if we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation, or in order to enforce or apply any agreements with you, or to protect the rights, property or safety of our Company, customers or others.

STORING YOUR PERSONAL DATA

If you are a Student or a Guarantor, we will retain your Personal Data for six years after the expiry of any tenancy agreement between us and the Student.

If you are an Emergency Contact, we will retain your Personal Data for the duration of time the Student for whom you are an emergency contact is resident in one of our properties.

If you are a Payee, we will retain your Personal Data for one month from the data we return any amount of the deposit to you after the end of the Student's tenancy agreement with us.

TRANSFERRING YOUR PERSONAL DATA

The personal data that we collect from you will not be transferred to, or stored at, a destination outside of the European Economic Area (EEA).

ACCESS TO INFORMATION, COMPLAINTS AND AMENDMENTS

- You have a right to access the personal information we hold about you and ask us to update it. Please contact us on the details above.
- You may also ask us to stop or restrict our processing or delete your personal information or to transfer your personal information to a third party in certain circumstances.
- If you have a complaint, please contact us on the details above or contact the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. www.ico.org.uk.

USE OF COOKIES

We may obtain information about your computer and general internet usage, including your IP address, operating system and browser type, for system administration purposes. In most cases we will need your consent to collect this information from you. Cookies are small files containing an identifier (a string of letters and numbers) saved to your computer's browser or hard drive that track, save and store information about your interactions and usage of the Site. This allows us to provide you with a tailored experience by remembering information about your usage and preferences.

Cookies may be either "persistent" cookies or "session" cookies. A persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by you before the expiry date. A session cookie on the other hand, will expire at the end of your session, when the web browser is closed.

The table below provides more information about the cookies we use and why:

Name of cookie	Owner	Purpose for the cookie
Google Analytics		This is a web analytics service provided by Google Inc which uses cookies to track visitor usage. It will save a cookie to your computer's hard drive in order to track and monitor your engagement and usage of the website, but will not store, save or collect personal information.

Other cookies may be stored to your computer's hard drive by external vendors when this website uses referral programs, sponsored links or adverts. Such cookies are used for conversion and referral tracking and typically expire after 30 days, though some may take longer. No personal information is stored, saved or collected.

Most web browsers automatically accept cookies, but if you wish to decline the use and saving of cookies, you should take the necessary steps within your web browser security settings. This may prevent you from taking full advantage of our Site or accessing certain parts.

For further information about cookies and how to disable them please go to <http://www.allaboutcookies.org/>.

CONTACT & COMMUNICATION

If you have any questions, want to exercise any of your rights or make a complaint please contact us **at Abodus Student Living, Portland Green, Portland Road, Shieldfield, Newcastle, NE2 1DT**, by telephone at 0191 484 0110 or email at enquiries@abodusstudents.com.

EXTERNAL LINKS

This policy extends only to our Site and does not cover your use of, provision of data to and collection of data on any other website.

Although this Site only looks to include quality, safe and relevant external links, you are advised to adopt a policy of caution before clicking on any external web links mentioned throughout this Site.

We cannot guarantee or verify the contents of any externally linked website despite their best efforts. You should always check the privacy policy before you submit any personal data to any third-party website, and we do not accept any responsibility or liability for any damages or implications caused by visiting any third-party website via our Site.

SOCIAL MEDIA PLATFORMS

Communication, engagement and actions taken through external social media platforms we participate on are subject to the terms and conditions as well as the privacy policies of each social media platform respectively.

We may use social media sharing buttons which help share web content directly from our Site to the social media platform in question. Users are advised before using such social media sharing buttons that they do so at their own discretion and note that the social media platform may track and save your request to share a web page respectively through your relevant social media account.

CHANGES TO THIS PRIVACY POLICY

This policy may be reviewed and amended from time to time. As a result of improvements, we make to our services, changes in the law or developments in technology, we may change the information we hold about you and the method and purposes for which we process such information. If we make any substantial change in the way in which we use your personal information we will notify you by email.