



Vastint UK – Residential Tenant Privacy Notice

1 Important information

1.1 This privacy notice provides information on how your landlord, Vastint UK Residential Limited (**Vastint** or **we/us**) collects and processes the personal data of tenants (including guarantors and occupants) in relation to prospective, current and past tenancies at the Sugar House Island development.

1.2 It is important that you read:

1.2.1 this Privacy Notice; and

1.2.2 the privacy notice provided by our managing agent, Jones Lang LaSalle Limited (**JLL**).

1.3 Vastint is the data controller and JLL is a data processor in respect of the Sugar House Island development and both have responsibilities in respect of your personal data.

1.4 JLL is primarily responsible for collecting and using your data to set up your tenancy agreement and check-in, manage rent collection during your tenancy, and handle tenancy renewals and check-out procedures. Data collected by JLL will be shared with Vastint only to the extent that Vastint needs to know that information as your landlord. We will always ensure that your personal data is handled by Vastint in line with the data protection legislation.

1.5 Our contractor POD Group Services Limited (**Pod**) will act on our behalf in managing your tenancy, for example by handling maintenance and security issues and complaints, and will act as a data processor on our behalf in relation to your data.

1.6 We have permitted Parking Control Management (UK) Ltd (**PCM (UK)**) to operate a parking management and enforcement service on our land and adjacent land belonging to other Vastint group companies.

2 Our contact details

Name: Vastint UK Residential Limited (company number 12413617)

Address: 135 High Street, London E15 2RB

Phone Number: 020 3384 7900

E-mail: dataprotection@sugarhouseisland.com

3 The type of personal information we collect

3.1 We currently collect and process the following information:

- 3.1.1 Personal identifiers, contacts and characteristics (for example: name, title, home address, email address, telephone number);
- 3.1.2 Household information (for example: details of your family/living situation, the number of people living with you in your household);
- 3.1.3 Tenancy information (for example: rent payment history, details of any enquiries, complaints, disputes raised by you or someone in your household);
- 3.1.4 Vehicle information in relation to vehicles parking on our land or adjacent land within the wider Sugar House Island development (for example: vehicle registration number; registered owner information; details of permits or licences issued; records of payments made for parking; details of enforcement action);
- 3.1.5 Other information, which may include:
 - (a) CCTV images when you visit our developments; and
 - (b) special category data, also referred to as sensitive personal data (for example, information regarding medical conditions, disability, health and/or family situation/relationships in so far as you provide that information to us and it is relevant to the way in which we and JLL manage your tenancy or car parking licences/ permits). We do not routinely collect this information.

4 **How we get the personal information and why we have it**

- 4.1 The personal information we process is provided directly by you to us or to JLL, Pod or PCM(UK) (who may in turn provide it to us) for one of the following reasons:
 - 4.1.1 You are signing-up to a tenancy and/or licence, including a car parking licence or permit;
 - 4.1.2 You make a complaint, enquiry or raise a dispute; and/or
 - 4.1.3 You or your visitors use the common areas, shared facilities (including wifi).
- 4.2 We also receive personal information indirectly, from the following sources in the following scenarios:
 - 4.2.1 Our employees, agents or contractors provide information to us (for example, maintenance service and other requests submitted to a property management service); and/or
 - 4.2.2 A third party provides information to us (for example, another resident, a member of the public, a local authority or government agency, utility supplier, credit or reference provider).
- 4.3 We use the information that you have given us in order to:

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- 4.3.1 Negotiate, enter into, administer and enforce your tenancy and/or licence and/or other agreement (including car parking licences and permits), including processing payments of rent, parking charges and other payments;
 - 4.3.2 Provide services and information to you and where appropriate improve or adapt our services to you;
 - 4.3.3 Handle complaints, enquiries and disputes; and
 - 4.3.4 Carry out performance audits, accounting and/or our statutory obligations.
- 4.4 We may share this information, where appropriate, with:
- 4.4.1 Our employees and others who work for Vastint (for example, contractors and agents);
 - 4.4.2 JLL and its employees;
 - 4.4.3 Pod and its employees, or any other property management and maintenance contractor(s) whom we may appoint from time to time;
 - 4.4.4 PCM (UK) and its employees, or any other parking management and enforcement service provider whom we may appoint from time to time;
 - 4.4.5 Our IT service provider;
 - 4.4.6 Our immediate parent company Vastint UK Services Ltd (company number 07394552) and other companies in the Vastint group of companies, including but not limited to Vastint UK B.V.;
 - 4.4.7 Our audit service provider(s), as well as other audit service provider(s) to the Vastint group of companies;
 - 4.4.8 Our legal advisers;
 - 4.4.9 Local authorities, government agencies, utility suppliers, credit or reference providers, insurers; and
 - 4.4.10 Any other third party with an interest in the tenancy.
- 4.5 Your data may be transferred outside the UK and European Economic Area (EEA) by a contractor or third party provided the following conditions are fulfilled:
- 4.5.1 appropriate safeguards are in place;
 - 4.5.2 you continue to have enforceable rights and effective legal remedies in respect of your data; and
 - 4.5.3 the contractor or third party complies with its obligations under the relevant data protection legislation and adequate protection is provided to your data.

4.6 Under the General Data Protection Regulation (**GDPR**) and other relevant data protection legislation in the UK, including the Data Protection Act 2018 (**DPA**), the lawful bases on which we rely for processing this information are:

Legal basis	Data being processed
(b) We have a contractual obligation	<p>Where is it necessary for us to process personal data for the performance of your tenancy and/or licence and/or another agreement between us, including where we:</p> <ul style="list-style-type: none"> - Negotiating and entering into a tenancy and/or licence and/or other agreement with you. - Administer and enforce your tenancy and/or licence and/or other agreement (including car parking licences and permits), including processing payments of rent and other payments; - Provide services and information to you and where appropriate improve or adapt our services to you.
(c) We have a legal obligation	Processing is necessary for Vastint and/or its parent company to carry out performance audits and meet their accounting and/or other statutory obligations.
(f) We have a legitimate interest	<p>Handling complaints, enquiries and disputes in the legitimate interest of administering the tenancy and defending or exercising claims.</p> <p>Recording CCTV images in the legitimate interest of safety and security at the development.</p> <p>Sharing information with JLL, Pod, PCM(UK) and our contractors in the legitimate interest of administering the tenancy and any car parking licence or permit, generally managing and enforcing parking on the development and defending or exercising claims.</p> <p>Providing your information to third parties, such as local authorities, utility suppliers and insurers in the legitimate interest of administering the tenancy and defending or exercising claims.</p>

4.7 We sometimes process sensitive personal data about you, such as information about your racial or ethnic origin, religious or philosophical beliefs, or health data. However, we will only

process this information in limited circumstances where it is appropriate for us to do so in our role as landlord. Where we process this kind of data, it will usually be on one of the following bases:

- 4.7.1 where that information is required to enable us to handle complaints, queries and disputes, we rely on Article 9.2(f) of the GDPR where it is necessary for us to establish, exercise or defend legal claims;
- 4.7.2 where the information is provided by you in order to assist in the proper management of your tenancy, we process this on the basis of your explicit consent, which can be withdrawn at any time (Art 9.2(a) of the GDPR);
- 4.7.3 where we are required to process that information in order to comply with the legal obligations on us as landlord, for example by making appropriate adjustments to the property (Art 9.2(g) GDPR and paragraph 6 of Part 2, Schedule 1 of the DPA 2018).

5 **How we store your personal information**

- 5.1 Your information is securely stored on our computer system in a folder to which a limited number of staff are permitted access.
- 5.2 We keep your personal data for up to 7 years after the end of your tenancy. We will then dispose your information by securely deleting electronic copies.

6 **Your data protection rights**

- 6.1 Under data protection law, you have rights including:
 - 6.1.1 **Your right of access** - You have the right to ask us for copies of your personal information.
 - 6.1.2 **Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
 - 6.1.3 **Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances. This right is limited where we rely on the legal basis set out in the table at paragraph 4.5 (row (c)).
 - 6.1.4 **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
 - 6.1.5 **Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances. This right is limited where we rely on the legal basis set out in the table at paragraph 4.5 (rows (b) and (c)).

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6.1.6 **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances. This right is limited where we rely on the legal basis set out in the table at paragraph 4.5 (rows (c) and (f)).

6.2 You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

6.3 Please contact us via the details in paragraph 2 of this Privacy Notice if you wish to make a request.

7 **How to complain**

7.1 If you have any concerns about our use of your personal information, you can make a complaint to us at

Name: Legal Counsel

Address: Vastint UK, 135 High Street, London E15 2RB

Phone Number: 020 3384 7900

E-mail: dataprotection@sugarhouseisland.com

7.2 You can also complain to the ICO if you are unhappy with how we have used your data.

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

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