



UK Residential Tenant Privacy Notice

1 Important information

- 1.1 This privacy notice provides information on how your landlord, being either Vastint UK Residential Limited (in respect of the Sugar House Island development in Stratford, London) or New Fountainbridge Ltd (in respect of the New Fountainbridge development at Freer Street, Edinburgh) (referred to in this Privacy Notice as **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 and New Fountainbridge developments.
- 1.2 It is important that you read this Privacy Notice in order to understand how your personal data may be used by us.
- 1.3 Your landlord (as named above) acts as data controller in respect of your personal data. In some circumstances, we may also act as a joint controller with another organization, such as the managing agent of the development in which you live. If that is the case, we will have a joint privacy notice in place with the joint controller which is available to view on the website related to that development.

2 Our contact details

Name: Vastint UK

Address: 135 High Street, London E15 2RB

Phone Number: 020 3384 7900

E-mail: legal.uk@vastint.eu

3 The type of personal information we collect

- 3.1 We currently collect and process the following types of information:



- 3.1.1 Personal identifiers, contacts and characteristics (for example: name, title, home address, email address, telephone number, age, gender, date of birth, nationality country of origin, marital status, child status, rental budget, property preferences, move-in date, rental budget and any information which you volunteer in relation to the above (as applicable));
- 3.1.2 Details obtained during the course of reference checks and/or as required by law (for example: employment situation and details, salary information, right to rent status, personal ID, visa details, credit history, criminal offence history)
- 3.1.3 Household information (for example: details of your family/living situation, the number of people living with you in your household, names, ages and contact details of those living with you);
- 3.1.4 Tenancy information (for example: lease/ tenancy details, parking and storage unit licence details, rent payment and debt history, banking/ card details, deposit information, guarantor information, details of any enquiries, complaints, disputes raised by you or someone in your household);
- 3.1.5 Vehicle information in relation to vehicles parking on our land or adjacent land within the 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);
- 3.1.6 Details and content of any email messages, SMS and IM messages (including via messaging apps) sent by you to us or to you from us for marketing or operational purposes;
- 3.1.7 CCTV images in relation to your use of the communal or landlord areas of our developments;
- 3.1.8 Information relating to your use of any communal wi-fi service provided by us, such as your device MAC address, IP address, device name (if broadcast) and dates/times of use;
- 3.1.9 Information collected in relation to the safety and security of the building and the property in which you live (for example: fob access records, and maintenance and inspection records relating to your property); and
- 3.1.10 Special category data, also referred to as sensitive personal data (for example, information regarding medical conditions and disabilities), but only in so far as you provide that information to us and it is relevant to the way in which we manage your tenancy or car parking or storage unit licences/ permits. We do not routinely collect this information.

4. Why we collect this information and how we use it

- 4.1 Why we collect personal information and how we use the information we collect depends in part on which services you enquire about, order or use, how you use them, and any preferences you have communicated to us. Below are the purposes for which we use the information we collect about you as well as the lawful basis for processing for each, shown in brackets.



- 4.1.1 To respond to enquiries about our companies or services from you [*Legitimate interests*]
- 4.1.2 To provide products and services to you (including renting a unit to you at the Property) and to run credit checks on prospective tenants [*Legitimate interests, necessary for a contract with you, explicit consent, equality of treatment*]
- 4.1.3 To communicate with you about the products and services we provide [*Legitimate interests*]
- 4.1.4 To market, promote and drive engagement with existing or potential services to existing or potential customers who have provided consent [*Consent*]
- 4.1.5 To personalise and customise your experience [*Legitimate interests, equality of treatment*]
- 4.1.6 To provide customer support and account management to you or your employer [*Legitimate interests, necessary for a contract with you, equality of treatment*]
- 4.1.8 To identify you and ensure the safety and security of your data [*Legal obligation, Legitimate interests, fraud prevention*]
- 4.1.9 To comply with customer or third-party contracted requirements [*Necessary for a contract with you, Legitimate interests*]
- 4.1.10 To engage with or procure services with third-party providers for services relevant to your enquiry, order or service [*Legitimate interests*]
- 4.1.11 To protect our legitimate business interests and legal rights [*Legitimate interests, establish, exercise or defend legal claims, preventing or detecting unlawful acts*]
- 4.1.12 To report on and analyse the performance of our portfolio [*Legitimate interests*]
- 4.1.13 To develop our business and build a better understanding of what our customers want [*Legitimate interests*]
- 4.1.15 To help protect you and us against fraud or other criminal activity [*Legitimate interests, legal obligation, establish, exercise or defend legal claims, fraud prevention, preventing or detecting unlawful acts*]
- 4.1.16 To help protect the security and safety of our buildings and our developments and those living and working within them [*Legitimate interests, preventing or detecting unlawful acts*]
- 4.1.16 To comply with any legal or regulatory obligations [*Legal obligation, Legitimate interests*]
- 4.1.17 To respond to any law enforcement agencies [*Legal obligation, Legitimate interests*]
- 4.1.18 To respond to any data subject requests from you [*Legal obligation, data you manifestly made public*]
- 4.1.19 Any other reason that complies with our obligations that we can justify as a legitimate business reason [*Legitimate interests*]

5. How we share information we collect

- 5.1 We may share your personal information for the purposes set out above and where we have a lawful basis to do so. We will only share personal information with third-parties that we have verified and are handling your details securely.
- 5.2 We use third-party service providers to process personal information on our behalf for the kinds of purposes set out below:



- 5.2.1 To market and let our properties
- 5.2.2 To manage our properties on our behalf, including to provide maintenance and repair services, deal with tenants' queries and complaints, administer tenancies and licences, and perform our legal obligations in relation to the properties
- 5.2.3 To process payment and refund transactions
- 5.2.2 To provide customer service, marketing, infrastructure, financial, audit, operational and/or technology services
- 5.2.3 To personalise and improve our services
- 5.2.4 To carry out tenancy-related services such as referencing and/or deposit protection
- 5.2.5 To carry out fraud and credit checks and collect debts
- 5.2.6 To analyse and improve the information we hold (including about your interactions with our service)
- 5.2.7 To run surveys
- 5.2.8 To provide parking enforcement and other security services
- 5.3 Where we use another organisation to process data for the above purposes, we still act as data controller of your personal information.
- 5.4 We may also share your personal information with government agencies to comply with legal, regulatory or law enforcement requirements.
- 5.5 We may also share your personal information with our group companies where those group companies carry out services or administrative functions on our behalf, and also for the purposes of financial reporting and audit, and as may otherwise be required by law.
- 5.6 We may share your personal information with third parties who may act as data controller in relation to that information, where relevant to your tenancy and / or the services being provided to you. This may include, for example, managing agents, local authorities, utility suppliers and insurers.
- 5.7 If there's a change (or expected change) in who owns us or any of our properties, we might share personal information with the new (or prospective) owner. If we do, they will be required to keep it confidential.

6 How we store your personal information

- 6.1 We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we restrict access to personal information so that only individuals within our organisation, and third-party controllers and processors of the data that need it for legitimate business purposes have access to it. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.
- 6.2 We also have data use policies and training in place to ensure all our staff are responsible for your data and understand their obligation to protect it.

7 How long do we keep information?

- 7.1 How long we keep the information we collect about you depends on the type of information and



the type of interaction you have had with us.

Except as stated below, we generally keep information for up to 7 years after the end of your tenancy or after your last enquiry or interaction with us, whichever is the later, unless we are required to retain it for longer for legal reasons.

We keep CCTV images for up to 30 days except where required to retain them for longer for legal reasons.

8 Automated decision making

If an organisation uses automated decision-making and/ or profiling, additional legal requirements apply. We do not currently undertake these activities.

9 Your data protection rights

- 9.1 Under data protection law, you have some rights in relation to your personal information which are listed below. These rights may be limited in certain circumstances:

Your right of access - You have the right to ask us for copies of your personal information.

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.

Your right to erasure - You have the right to ask us to erase your personal information.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information.

Your right to object to processing - You have the right to object to the processing of your personal information.

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.

- 9.2 Please contact us via the contact details below if you wish to make a request to exercise any of these rights.

10 How to make a request or a complaint

- 10.1 If you wish to make a request to us to exercise any of your rights listed above, or if you wish to make a complaint about our use of your personal information, you can contact us at

Name: Legal Counsel

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

Number: 020 3384 7900

E-mail: legal.uk@vastint.eu

- 10.2 You can also contact our Group Data Protection Officer, Johan Martens at johan.martens@vastint.eu.



10.3 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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