



CLEARWATER  
PROPERTY LETTINGS

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## PRIVACY POLICY

Created January 2022

This notice explains what information we collect, when we collect it and how we use this. During the course of our activities, we will process personal data (which may be held on paper, electronically, or otherwise) about you and we recognise the need to treat it in an appropriate and lawful manner. The purpose of this notice is to make you aware of how we will handle your information.

### Who Are We?

Clearwater Property Lettings (“I”/ “we” or “me”/ “us”) take the issue of security and data protection very seriously and strictly adhere to guidelines published in the General Data Protection Regulation (EU) 2016/679 which is applicable from the 25<sup>th</sup> May 2018, together with any domestic laws subsequently enacted.

We are notified as a Data Controller with the Office of the Information Commissioner under reference number ZA631062 and we are the data controller of any personal data that you provide to us.

Our Data Protection Officer is Charlotte Neales. You can contact her on [charlotte@clearwaterpropertylettings.com](mailto:charlotte@clearwaterpropertylettings.com) or 07939 609 940

Any questions relating to this notice and our privacy practices should be sent to [charlotte@clearwaterpropertylettings.com](mailto:charlotte@clearwaterpropertylettings.com).

### How We Collect Information from You and What Information We Collect

We collect information about you:

- From your prospective Tenant Questionnaire
- From your application for accommodation
- From your use of the referencing forms downloaded and completed from the Vouch Tenant Referencing website or similar (including but not limited to creating tenancy agreements, guarantor agreements, or notice).

We collect the following information about you:



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- Tenant name, e-mail address, telephone number, Date of Birth, address (including any previous addresses), marital status, National Insurance Number, nationality, next of kin, name of university or college where you are studying (if applicable), the name of friends that you are staying with (if applicable);
- Guarantor name, e-mail address, telephone number, Date of Birth, address (including any previous addresses), marital status, National Insurance Number, nationality, next of kin (if applicable);
- Property address; term, rent, deposit, utility and service responsibilities;
- The employment status of tenants and/or guarantors, address, contact details (including email, phone and fax numbers) of the employer/accountant, payroll numbers, length of employment, salary information (including any regular overtime or commission), and any other income received;
- Bank account details of the tenant, including account number and sort code, and any hire purchase/loan agreements/credit cards or store cards that you have;
- Credit check details; and
- Any welfare benefits that you may be eligible for, or are currently on.

## Why We Need This Information About You and How it Will be Used

We need your information and will use your information:

- to undertake and perform our obligations and duties to you in accordance with the terms of our contract with you;
- to enable us to supply you with the services and information which you have requested;
- to help you to manage your tenancy;
- to carry out due diligence on any prospective tenant, including whether there is any money judgements against them, or any history of bankruptcy or insolvency;
- to analyse the information we collect so that we can administer, support and improve and develop our business and the services we offer;
- to contact you in order to send you details of any changes to our suppliers which may affect you; and
- for all other purposes consistent with the proper performance of our operations and business.

## Sharing of Your Information

The information you provide to us will be treated as confidential and will be processed only by any third party acting on our behalf, within the UK/EEA. We may



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disclose your information to other third parties who act for us for the purposes set out in this notice or for purposes approved by you, including the following:

- If we enter into a joint venture with or merged with a business entity, your information may be disclosed to our new business partners or owners;
- To carry out due diligence on you as a prospective tenant/ guarantor, including but not limited to the carrying out of affordability checks, due diligence checks and the obtaining of references from relevant parties, whose data you have provided;
- If you request so, your information shall be disclosed in order to determine if there are any money judgements against you, as the prospective tenant/guarantor, or to determine if they have a history of bankruptcy or insolvency;
- If you are unable to make payments under your tenancy, your information may be disclosed to any relevant party assisting in the recovery of this debt or the tracing of you as a tenant; and
- In the creation, renewal or termination of the tenancy, your information will be disclosed to the relevant local authority, tenancy deposit scheme administrator, service/utility provider, freeholder, factor, facilities manager or any other relevant person or organisation in connection with this.

Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.

### Transfers Outside the UK and Europe

We may use third party service providers located outside the European Economic Area (“EEA”). As such your information, including Personal Data, may be transferred to — and maintained on — computers located outside of the EEA. Clearwater Property Lettings will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy. No transfer of your Personal Data will take place to an organisation or a country unless there are adequate controls in place including the security of your Personal Data in compliance with applicable data protection laws.

### Security

The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.



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## How Long Will We Keep Your Information?

Clearwater Property Lettings will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. You may opt-out at any time from receiving marketing communications from us in accordance with section “Your Rights” below. We will also retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk from harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

You can request details of our retention periods for different aspects of your Personal Data by contacting us.

## Your Rights

You have the right at any time to:

- ask for a copy of the information about you held by us in our records;
- require us to correct any inaccuracies in your information;
- make a request to us to delete what personal data of yours we hold; and
- object to receiving any marketing communications from us.

If you would like to exercise any of your rights above please contact us at [charlotte@clearwaterpropertylettings.com](mailto:charlotte@clearwaterpropertylettings.com)

Should you wish to complain about the use of your information, we would ask that you contact us to resolve this matter in the first instance. You also have the right to complain to the Information Commissioner’s Office in relation to our use of your information. The Information Commissioner’s contact details are noted below:

England:  
Information Commissioner's Office  
Wycliffe House, Water Lane



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Wilmslow, Cheshire, SK9 5AF  
Telephone: 0303 123 1113  
Email: casework@ico.org.uk

Scotland:  
The Information Commissioner's Office – Scotland  
45 Melville Street, Edinburgh, EH3 7HL  
Telephone: 0131 244 9001  
Email: Scotland@ico.org.uk

Wales:  
Information Commissioner's Office  
2nd floor, Churchill House  
Churchill way, Cardiff, CF10 2HH  
Telephone: 029 2067 8400  
Email: wales@ico.org.uk

Northern Ireland:  
Information Commissioner's Office  
3rd Floor, 14 Cromac Place  
Belfast, BT7 2JB  
Telephone: 028 9027 8757  
Email: ni@ico.org.uk

The accuracy of your information is important to us - please help us keep our records updated by informing us of any changes to your email address and other contact details.

## Changes to This Privacy Policy And Your Duty To Inform Us Of Changes

We may update our Privacy Policy from time to time. We will let you know via email and/or a prominent notice on our website, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy. You are advised to review this Privacy Policy online periodically for any changes. Changes to this Privacy Policy are effective when they are posted on the website.

It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during your relationship with us.