



## **Privacy policy**

Here at Sulets, we're committed to protecting your personal information and respecting your privacy in everything we do. This Policy lets you know what data we may collect about you, how we use it and gives you information about your rights and how you can get in touch with us.

Sometimes we need to change our Privacy Policy. Any changes will be published on this website which, of course, can be accessed at any time.

### **Who we are**

Sulets is a leading highly trusted accommodation provider in Leicester and the only agency recommended by both universities. Offering quality accommodation at an affordable price with an honest service is central to the Sulets offer, with no hidden costs or agency fees.

We are part-owned by the Students' Unions of De Montfort University and University of Leicester and are a not-for-profit organisation. This means that any funds we do raise will be invested straight back into the student university experience.

Currently we provide 1850 bed spaces across seven great quality apartment blocks across the city along with over 150 private houses; offering a range of self-contained, en-suite facilities and shared living spaces.

Sulets is an Educational Charity. Registered in England. Registered Number 08140750.  
Registered Office: De Montfort University, Campus Centre Building, Mill Lane, Leicester, LE2 7DR

## **What information we collect about you**

When you register with us to apply for accommodation, we collect name and contact details, gender and date of birth. This is because we will be creating a Tenancy Agreement for you which is a legal document. We ask if you have a medical condition/disability which would affect what type of room you would need. We also ask for the name and contact details of your Guarantor, what their occupation is, how long they have lived at their address and whether they own or rent the property they live in. Tenants and prospective tenants should ensure that they have obtained permission from their guarantors when providing their personal details to Sulets.

We also ask you to tell us your nationality and ethnicity. This is a standard question on the software we use, but it does help us to understand people's specific living requirements better. For example, you may need to live in a single sex environment.

When visiting this website, we have access to your IP address, data showing when you visited, which pages you looked at, information about your operating system, device and browser version. This data is gathered using Google Analytics and commonly used tools such as cookies and web beacons.

## **Why we collect personal information about you and what we do with it?**

### **Where we have an obligation as a provider of Sulets products and services (for the 'performance of a contract')**

- To provide you with the product or service that you have purchased from us (Tenancy Agreement).
- If you are already a resident, to provide you with information on your tenancy. For example, issuing a Section 21 Notice to remind you when your tenancy end date is, letting you know when contract renewals begin, letting you know when maintenance contractors or staff will visit the property, reminding you of rent payment dates, letting you know when we will start to carry out viewings on properties as part of our relaunch and informing you of any viewings booked.

### **Where we have your permission ('consent')**

- To provide you with news about offers and deals that we think will be interesting to you. We will only contact you in the ways you have given us permission to do so. You can change your mind at any time by contacting [marketing@sulets.com](mailto:marketing@sulets.com), by logging into your online account (if you live in or own a student house) or by writing to us at Sulets, De Montfort University, Campus Centre Building, Mill Lane, Leicester, LE2 7DR.

### **Where we have a justifiable reason ('legitimate interests')**

- To enhance or improve your experience with us. This may mean that we learn about your preferences and habits and then tailor our communications with you to make sure that what we send is relevant to you ('profiling').
- To put your information together with other customer's data and external non personal information so that we better understand our market through analysis and segmentation to ensure that we keep offering competitive products and services and improve our website.
- To send you marketing materials where we can demonstrate a relationship with you and you have not told us that you do not want to receive these.
- To maintain our list of people who have asked not to receive direct marketing material from us.
- To help keep our website safe and secure.
- To allow our internal business processes to function- for example transacting with our partners, carrying out audits, producing management information and dealing with complaints.
- To undertake market research.
- To request feedback on our performance.
- To help prevent fraud and maintain security.
- To assist in training, quality assurance and compliance.

### **Where we have to do something by law ('legal obligation')**

- To ensure that your rights are met under the UK Data Protection Act.
- To meet our obligations with law enforcement agencies, courts and other organisations.
- To comply with anti-money laundering regulations.

### **In exceptional circumstances ('vital interests')**

- We may use your information in rare situations where vital interests of yourself or another person needs protecting, for example, to trace a missing person or if someone's life could be in danger.

### **Special Category Data**

- Sulets collect special category data on disability and ethnicity to help us assign rooms in certain circumstances. We do this in compliance with Article 9(2) G of the General Data Protection Regulations:

*“processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject”.*

### **Who we share your information with?**

We do not sell your information to anyone and only pass it to our trusted partners and service providers who work with us to run our business. We may pass your information to:

- Service providers who work for us such as maintenance contractors to arrange appointments for repairs.
- The owner of the property you live at.
- Our software providers:
  - Docusign
  - Drop Box
  - KX
  - LetMC
  - Mail Chimp
  - My Docs Online
  - Survey Monkey
- Regulatory bodies, courts and law enforcement agencies.
- Our partner companies to supply products or services and where there is a complaint or query. For example, De Montfort University, the University of Leicester and Student Roost.

## Who are the data sources?

The data sources are:

- Tenants and prospective tenants.
- Guarantors of tenants and prospective tenants
- HM Land Registry for Landlords

## How long do we keep your personal information?

How long we keep your personal information depends on why we have it and what we're doing with it.

We keep records of any dealings you have with us or our partner companies for six years after the last contact for legal and accounting reasons.

We will keep other personal information about you if it is necessary for us to do so to comply with the law.

## Transferring information outside of the EEA

Your personal information may be processed and transferred outside the European Economic Area (EEA).

## Your Rights and Choices

**Direct Marketing:** You have the right to object to direct marketing. This is done by contacting [marketing@sulets.com](mailto:marketing@sulets.com), by logging into your online account (if you live in or own a student house) by calling our office on 0116 257 6303 or by writing to us at Sulets, De Montfort University, Campus Centre Building, Mill Lane, Leicester, LE2 7DR.

**Consent:** Where we use your information on this basis, you have the right to withdraw that consent.

**Access:** You can request a copy of all the personal information we hold about you and other data relating to how we use your information by contacting our office.

**Correction ('Right to Rectification'):** We always want to use the most up to date information about you so please get in touch if you think we don't have that.

**Deletion ('Right to be Forgotten'):** In some circumstances, including where we are relying on your consent to use your data, you have a right to request us to delete your information.

**'Right to Portability':** If we have collected your data because you have given us consent, or because we need it in order to provide you with a product or service (under a contract), you have the right to receive the information you gave to us back in a 'machine-readable' format.

**'Right to Object' and 'Right to restriction of processing':** If we are using your data for activities under the 'legitimate interest' justification and in other circumstances, then you have a right to request restriction of processing and also a right to object to that processing.

**Right to obtain human intervention** where automated processing has taken place where consent has been given or under a contract and where the processing has a legal or similarly significant effect.

**Complain:** you have the right to lodge a complaint with the Information Commissioner's Office if you think that our use of your information doesn't meet the law. For more information, visit the [ICO](#) website.

### **Contact us**

For further information about our privacy practices and to request any of these rights then please contact Sulets.

- Write in: Irving Hill, CEO, Sulets, De Montfort University, Campus Centre Building, Mill Lane, Leicester, LE2 7DR.
- Email: [enquiries@sulets.com](mailto:enquiries@sulets.com)

### **Keeping your personal information secure**

We take the security of your personal information seriously. Our record keeping systems have built in security, and we have rules and measures to protect the personal information we have under our control, both on and offline, from improper access, use, alteration, destruction and loss.

We will take all reasonable and proportionate steps to protect your personal information.

## **Cookies**

A cookie is a small text file that is saved to the hard drive of your computer when you use a website.

There are a few ways in which you can give Consent for using Cookies that need your consent.

- You can click the box or boxes that pop up to allow us to use them when you first visit our website, and periodically when you continue to use our website.
- You can choose your preferences by enabling and disabling cookies within the browser you are using, for example, within Google Chrome, Safari or Mozilla Fire Fox.

### **To withdraw consent for cookies**

- You can go into your browser settings and change the Cookie choices you have made.
- You may need to remove the persistent cookie text files that have an expiry date in the future.
- Deselect or reselect alternative choices, with tick boxes, where those options exist.

## **Our Website**

- The content of the pages of our website is for your general information and use only. It is subject to change without notice.
- Our website uses cookies to monitor browsing preferences. If you do allow cookies to be used, your personal information may be stored by us.
- Neither we nor any third parties provide any warranty or guarantee as to the accuracy, timeliness, performance, completeness or suitability of the information and materials found or offered on this website for any particular purpose. You acknowledge that such information and materials may contain inaccuracies or errors and we expressly exclude liability for any such inaccuracies or errors to the fullest extent permitted by law.
- Your use of any information or materials on our website is entirely at your own risk, for which we shall not be liable. It shall be your own responsibility to ensure that any products, services or information available through our website meet your specific requirements.

- Our website contains material which is owned by or licensed to us. This material includes, but is not limited to, the design, layout, look, appearance and graphics. Reproduction is prohibited other than in accordance with the copyright notice, which forms part of these terms and conditions.
- All trademarks reproduced in this website which are not the property of, or licensed to, the operator are acknowledged on the website.
- Unauthorised use of our website may give rise to a claim for damages and/or be a criminal offence.
- From time to time our website may also include links to other websites. These links are provided for your convenience to provide further information. They do not signify that we endorse the website(s). We have no responsibility for the content of the linked website(s).
- Your use of this website and any dispute arising out of such use of the website is subject to the laws of England, Northern Ireland, Scotland and Wales.

### **Changes to our Privacy Policy**

Updated on 23 May 2018

Reviewed 14 March 2019