

## CONTRACTING AND LIVING WITH US

### WHAT IS THE PURPOSE OF OUR PRIVACY STATEMENT?

Under the Data Protection Legislation, we are required to provide an explanation as to why we require you to provide certain personal information (also known as “personal data”) relating to you; how we intend to use the personal information you provide to us; and whether or not we will share that information with anyone else.

### WHO ARE WE?

CARO Student Living is a trading arm of CARO Lettings Limited. CARO Lettings Limited provides student and private accommodation across Liverpool and the surrounding areas.

Any reference in this, and the accompanying statements, to CARO Lettings Limited includes reference to CARO Student Living.

Should you wish to contact us, CARO Student Living’s address is 33 Netherfield Road North, Liverpool, L5 3TA. Alternatively, you may contact us by visiting the [“Contact Us”](#) section of this website.

CARO Lettings Limited is registered with the Information Commissioner’s Office in the United Kingdom.

This privacy statement applies to personal information collected by CARO Student Living. It does not apply to any personal information that is collected by third parties, individuals, organisations or other websites which we may be linked from or linked to. In the case of any third parties collecting your personal information, their own privacy policies will apply.

### WHAT INFORMATION ARE WE COLLECTING?

CARO Student Living limits the personal information it collects to the personal information required to provide the services you have requested. You may provide that information to us via our website enquiry form, over the telephone, via email, in person or through an application form. The types of personal information we collect may include, for example:

- Name;
- Address and contact details;
- Date of birth;
- Gender;
- Nationality;
- Guarantor details (if applicable);
- Details of the university/college course you are enrolled on, the year(s) you are enrolled for and your student identification number;
- Your room preferences (e.g. preferred room type, sharing preferences).

In certain circumstances, we may also collect certain special categories of personal information, such as information concerning your health, which are known as sensitive personal data.

### WHY ARE WE COLLECTING YOUR INFORMATION?

CARO Student Living requires certain personal information be shared with us so we can enter into, and fulfil our obligations and exercise our rights under your contract with us. Such personal information may be provided to us via channels such as email, our website enquiry form, over the telephone, in person or when

completing an application form. Without this information, we would not be able to provide you with the service you have requested.

## **WHAT DO WE DO WITH YOUR INFORMATION?**

CARO Student Living will use the personal information you provide to us in the following ways:

- To enter into and fulfil our obligations and exercise our rights under your contract with us;
- To process payments from you in accordance with your contract with us and, if necessary, instruct and liaise with debt collection agencies if you fall behind with your payments;
- To operate CCTV systems and review CCTV footage for security purposes at our properties; and
- To engage and make contact with you in the method you have requested.

The personal information we collect from you will be securely stored by us in accordance with our internal data protection policies and procedures which have been assessed to ensure they meet the requirements set out under the Data Protection Legislation.

It will be used by us in accordance with this privacy statement and also in accordance with your rights under the Data Protection Legislation.

On rare occasions, and only when necessary, CARO Student Living may collect special categories of personal information (sometimes referred to as sensitive personal data) relating to you, such as information relating to your health and/or any disabilities you may have. This type of information will be used to assess your accommodation needs and ensure that any accommodation we may offer to you meets your requirements. By providing us with such sensitive personal information, you consent to us using it for this purpose. Should you not provide us with this consent, we may not be able to allocate to you a room appropriate for your needs.

## **DO WE SHARE YOUR PERSONAL INFORMATION?**

### **THIRD-PARTY SERVICE PROVIDERS**

It may be necessary for CARO Student Living to share your personal information with our service providers in order to provide you with the services you have requested. We will only share such personal information with relevant service providers to the extent required to enable us to provide the services you have requested. CARO Student Living has assessed its service providers to ensure they have appropriate data protection safeguards and frameworks in place to allow them to comply with the requirements of the Data Protection Legislation.

Within the terms and conditions of our contracts with our service providers, it is clearly stated that such service providers are not permitted to share your personal information with any other parties and are only to use the information in the course of their work on behalf of us.

### **REGULATORS AND OTHER LEGAL OBLIGATIONS**

We may, from time to time, also be required to share your information with regulators, crime prevention agencies and other organisations who are permitted access to such personal information as a matter of law.

### **OTHER ORGANISATIONS**

CARO Student Living may from time to time share your information with other organisations, such as:

- Partner organisations whom we have data sharing agreements, with for example Universities.
- Internet service providers in connection with the internet service provided to your accommodation.
- Debt recovery, deposit protection and credit reference agencies who we may use in relation to our contract with you.

## **WHAT SECURITY MEASURES CONCERNING YOUR PERSONAL INFORMATION DO WE HAVE IN PLACE?**

CARO Student Living ensures that any personal information you provide to us is securely stored on our systems and servers and that any paper-based records of your personal information will be stored and

destroyed in accordance with our data retention policies and procedures. We treat data security with the utmost importance and take appropriate measures to keep your personal information secure.

CARO Student Living also ensures that only relevant members of staff have access to your personal information. Your personal information will only be available to relevant members of staff who have a legitimate reason for accessing your personal information.

### **CAN CARO STUDENT LIVING USE YOUR INFORMATION FOR ANY OTHER PURPOSE?**

CARO Student Living may wish to market its products and services to you throughout your university/college life. We are required to obtain specific consent from you for such marketing. However, if you do not positively opt to receive such marketing, we will not contact you for this purpose.

CARO Student Living will not use your personal information for any purpose other than providing the services you have requested and, if you have explicitly consented for it to do so, for its own marketing purposes.

### **HOW DOES CARO STUDENT LIVING STORE YOUR PERSONAL INFORMATION AND WHEN DO WE DELETE IT?**

CARO Student Living stores your personal information on a database that is specific to your contract with us and any previous contact you may have made with us and provides us with your personal information which allows us to enter into and fulfil our obligations and exercise our rights under our contract with you as well as sending you marketing emails, but only if you have opted to receive such materials. Your personal information is stored in accordance with our Data Retention Policy which states that we will hold your data for no more than seven years following termination of our contract with you. At the end of the six-year retention period, your personal data will be destroyed and/or deleted from our records.

CARO Student Living also has various legal and regulatory obligations which dictate the length of time your personal information is held on our systems and servers.

### **WHAT ARE YOUR RIGHTS?**

In short, you have the right to

- Request access to your personal information
- Request we rectify any inaccurate or incomplete personal information
- Request that we erase the personal information we hold on you and take steps to ask others with whom we have shared your information to also erase it
- Request that we limit what we do with your personal information
- Object to our use of your personal information and ask us to stop that use
- Instruct us to provide you with the information we hold about you in a structured and commonly used format or transmit that information directly to another organisation.

Our obligations to comply with the above rights are subject to certain exemptions and further information on these exemptions can be obtained by contacting us at [students@carostudentliving.com](mailto:students@carostudentliving.com).

In the event that CARO Student Living is using your personal information because you have provided consent for us to do so, you can withdraw that consent at any time. This can be done either in writing or verbally, or where you have registered with us, through the online portal which allows you to amend your consents at any time. The lawfulness of our use of your information before consent was withdrawn is not affected.

To exercise any of the rights referred to above, you should contact us either in writing to: CARO Student Living, 33 Netherfield Road North, Liverpool, L5 3TA or by email to [students@carostudentliving.com](mailto:students@carostudentliving.com).

You also have the right to complain to the Information Commissioner's Office (the "ICO") if you are not satisfied with the way in which we use your personal information. You can contact the ICO by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

## WHAT IS THE LEGAL BASIS FOR USING YOUR INFORMATION?

CARO Student Living is required to have a “legal basis” for collecting, processing and storing your personal information. Under the Data Protection Legislation, there are six available lawful bases which allow for us to process personal information. These are:

- Consent
- Contract
- Legal obligation
- Vital interests
- Public task; and
- Legitimate interests.

The lawful basis that CARO Student Living relies upon when collecting, processing and storing your personal information is Contract.

If you have consented to us contacting you for marketing purposes, the legal basis for us contacting you for such purpose is Consent. In the event that we collect, process and store sensitive personal data about you, the lawful basis for us doing so will be your provision of explicit consent.