

Data & Privacy Policy Statement

This Privacy Notice summarises how Live-in Guardians collects, stores, processes and updates personal data used to help us offer property protection and affordable temporary accommodation solutions. When we collect and store information, we are subject to the UK General Data Protection Regulation (UK GDPR).

The following information will help you to:

- Understand how to view data held by Live-in Guardians about you
- Find out how to correct information we hold about you, if necessary
- Find out how to exercise your legal rights in relation to personal data about you

Data controller and responsible persons

When we refer in this Privacy Notice to "Live-in Guardians", "we" or "us" we mean Live-in Guardians Limited a company registered in England. The Data Controller for the purposes of the GDPR is Live-in Guardians Ltd of Arfa House, 20-21 Arcadia Avenue, London, N3 2JU. Live-in Guardians has an employee responsible for implementing and overseeing data protection compliance who can be contacted at administration@liveinguardians.com.

Live-in Guardians' Chief Executive has responsibility for data protection compliance.

Live-in Guardians Ltd is registered with the Information Commissioner's Office (ICO). Our registration number is ZB130882 and our registration information can be viewed on the ICO website.

Why Live-in Guardians collects, processes and stores personal information

Live-in Guardians needs to collect, store and process personal information to carry out its core functions of finding Property Guardians, marketing, Guardian management, property management, business development and sales. In this



context, 'processing' also refers to Live-in Guardians just storing your information.

Legal basis of consent

Live-in Guardians' main legal basis for processing personal data is where it is necessary for the purpose of the legitimate interests pursued by us to process your information. We aim to do this as long as we do not interfere with your freedoms or rights.

There are other instances where we can justify processing your personal information including:

- Where you have given consent (also known as 'agreement')
- Where we are under a legal obligation to collect information or a contractual obligation to process/disclose the information
- Where we need to protect the vital interests of another person or organisation

How Live-in Guardians collects personal information

Personal data will often be collected through the following types of interaction:

- Use of our website (including data collected from cookies on our website), and information entered into the website
- Use of a property management site Arthuronline.co.uk. Application information collected through our website is sent directly to Arthur online and stored there
- Information provided to our employees, directors, agents, service providers, and contractors, regardless of communication method (examples include as part of a phone call, by email, in a meeting or home/site visit)
- Information recorded in our IT systems and databases including text and images
- Information provided by you in paper form and stored by us including text and images



- Events (such as photos, or videos, for which we will seek your consent on an event-by-event basis)
- Still and moving image and audio captured by CCTV, where this exists at certain operational sites, and is controlled by Live-in Guardians. Notices displayed locally will inform you if this is the case

In detail: what data we collect, handle and store

Here, we look at how your personal information is used depending on your actual or proposed relationship to us. These relationships include:

- Applicants for housing
- A current Guardian living in a building that we manage
- A former Guardian who has moved out of a building that we manage
- Any other individual not included in one or more of the above categories

The lists of collected data we highlight below are not intended to be exhaustive. Generally the information we hold will have been provided to us by you (at the point of application, or when we communicate with you).

Applicants for housing

We collect, process and store the following information:

- Contact information
- Information on unspent convictions
- Financial details, including earnings
- Details relevant to becoming a property Guardian
- Details relevant to property management
- Images of your identification documents and proof of address, in order to comply with legal duties of property managers

We collect this data in order to:

• Create an electronic record of your application



- Process your application, including verifying your identity
- Invite you to viewings, meetings and other activities
- Conduct research designed to help us improve the quality of our services
- Handle complaints and disputes
- Ensure we make unbiased, fair decisions when offering housing
- Ensure that our service is accessible to as many people as possible

A current Guardian living in a building that we manage, or a former Guardian who has moved out

We collect, process and store the following information:

- Contact details
- Information on unspent convictions
- Financial details including actual or expected earnings, regular payments and liabilities including debt
- Details relevant to being a Property Guardian, including notes on our interactions and conversations
- Details relevant to property management
- Images of your identification documents and proof of address, in order to comply with legal duties of property managers.
- Your service requests to us (for example, repairs)
- Your payments and fees account status
- Notes gathered from property inspections about your conduct
- Actions we have taken to recover monies owed
- Responses to customer satisfaction surveys designed to help us improve the quality of our services

We collect this data in order to:

- Create an electronic record of your housing
- Communicate with you about your housing, your building and your relationship with Live-in Guardians
- Collect your fees and any amounts due to us



- Ensure efficient and effective property management and contract management
- Promote and advertise our services (we will always seek consent from you for any marketing we do)
- Build a picture for our clients (property owners) of who we house. The summaries we send them will always contain anonymised data
- Conduct research
- Handle complaints and disputes
- Provide any references we are asked to

Any other individual not included in one or more of the above categories

We collect, process and store the following information:

- Contact details
- Communication preferences
- Records of your contact with us and our contact with you

We collect this data in order to:

- Communicate with you by your preferred methods about services and activities which you may find useful
- Progress transactional or professional activity (examples would be a licensing application, contact with you for a professional reason if you are an employee of a local authority or another organisation that regulates or controls our activities)
- Conduct research which is designed to help us improve the quality of our services

Marketing

We will use your personal data to send you updates (by email or text message) about our housing services, including available properties and viewings.



We may ask you to confirm or update your marketing preferences if you ask us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

We will always treat your personal data with the utmost respect and never share it with third-party organisations for marketing purposes.

How to opt out of our marketing communications

If you have signed up to receive one of our newsletters via email you can unsubscribe by clicking the 'unsubscribe' button at the bottom of the email.

You can also get in touch at info@liveinguardians.com, stating which email newsletter you would like to be unsubscribed from.

We aim to unsubscribe you within seven working days.

Market research

On occasion we may work with a market research organisation to carry out a survey on our behalf. You will always be notified beforehand in order to seek consent for taking part.

Sharing data with third parties

From time to time we share selected information with third parties in order to achieve:

- Efficient and effective property management and contract management (for example, we may share information about who lives in which property with our clients and building owners, or with a contractor undertaking a repair on our behalf, or with debt collectors when necessary)
- Our legal and regulatory obligations (for example, we'll share information with the fire brigade, law enforcement, or the courts when necessary)



How long we keep your data for

As per the General Data Protection Regulation (GDPR), any personal data we hold on you will only be kept until it no longer serves the original purpose for which it was collected and used.

Prospective Guardians

If your application to become a Guardian is successful but you are not housed with us within 12 months, we will delete your application details, however, you will remail on our mailing list until you unsubscribe or until we email you to confirm whether you would like to continue to hear from us.

If your application fails or is rejected, we will delete your application details after 12 months.

Current Guardians

Your data will be stored for as long as you are a Guardian with us. We will also periodically review this information to ensure that it is up-to-date. We also ask that you let us know if your information changes.

Former Guardians

After you stop being a Guardian with us we will retain your information for 6 years.

Your rights under the General Data Protection Regulation (GDPR)

You have a number of rights under the provisions of the GDPR. With regard to your data, you have the right to:

- Access and check your personal data
- Request a correction to your personal data



- Withdraw consent: if you have provided us with consent to use your personal data you have a right to withdraw that consent easily at any time. Withdrawing consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn
- Request a restriction on processing: you can restrict processing of your personal data in certain circumstances, e.g. if you contest the accuracy of the data
- Object to your personal data being processed for direct marketing (including profiling), or in certain other situations to our continued processing of your personal data, e.g. processing carried out for the purpose of our legitimate interests unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise or defence of legal claims
- Request erasure (exercise your "right to be forgotten") of your personal data
- Receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations ("right to data portability")
- Not be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

To exercise any of these rights, please contact us at administration@liveinguardians.com.

Find out more about your rights on the <u>Information Commissioner's Office</u> website.

Processing methods, storage and security

We store your data using the following methods:

- Arthur online
- Mailchimp



- Paper records
- Microsoft SharePoint/Internal server

Regardless of the type and extent of personal information we hold about you, you can expect the following safeguards:

Cloud based storage: Most of the information we process is stored on the cloud, and storage on hardware is limited. This lessens the threat of information being lost through not having any back-up or it being physically stolen. The programmes we have chosen to use have renowned security systems which minimise our risk of being hacked/ having any data stolen.

Password protection: All of our information stored in the cloud is protected by password.

Physical storage: All information that is not stored on the cloud will be stored on hardware that is both password protected and encrypted or securely locked on site. This reduces the risk of physical information being stolen or compromised.

Need to get in touch?

You can contact our data protection officer at administration@liveinguardians.com if you have any questions about this privacy policy, the information we hold about you or to make a complaint.

Changes to this Privacy Notice

We aim to keep our Privacy Notice up to date, to reflect changes in our business operations, to reflect improvements and quality and to respond to feedback and any changes in legislation.

This Privacy Notice was last updated in February 2023.