

# The Mansion Group Holdings

## PRIVACY POLICY

### Introduction

The Mansion Group Holdings is a limited company registered in England & Wales under number 07264889. Its registered office is 1 Oakwood Square, Cheadle Royal Business Park, Cheadle, Cheshire, SK8 3SB.

Please read this Privacy Policy carefully to understand why data is being collected and what we do with that data once in our possession.

We may change the privacy policy of the terms of business from time to time by amending this page.

The Mansion Group Holding's Data Protection Officer can be contacted on **0161 828 0580** or by emailing [dpo@tmgh.co.uk](mailto:dpo@tmgh.co.uk).

### How do we collect information from you?

We collect information about you when you register with us or contact us to enquire about our accommodation or services, via our website, in person, by telephone or by email, or during the course of our work with you.

### What type of information will we collect from you?

The personal information we collect will depend on the nature of the services we are providing or the services you are providing for us. Typically, this might include the following:

- Company information (including company name, registered address, email address, telephone number, bank account details)
- Contact details of relevant individuals at your organisation so that we can communicate with you
- Information given to us on booking forms such as personal details, guarantor information and payment information
- Information given to us on online enquiry forms or 'request a call back' forms including contact details
- Photographic identification and proof of address documents (typically applicable for guarantors)
- Banking and financial details (to establish the source of funds where a transaction is involved)
- Details of visits to our website (which enable our website to remember information about you and your preferences). Please read our '[Cookies Policy](#)' for further details

Where necessary to act in your best interests when providing you with student accommodation, we may need to process information which is very sensitive in nature such as diversity and health related details. If you volunteer sensitive personal data, you will be allowing us to process it as part of engaging our services.

### On what basis can we process your information?

The legal grounds for processing your personal data are as follows:

- It is necessary for the performance of a contract to which you are a party, or to take steps prior to entering into a contract with you.
- It is necessary for the purposes of our legitimate interests, except where our interests are overridden by the interests, rights or freedoms of affected individuals (such as you). To determine this we shall consider a number of factors, such as what you were told at the time you provided your data, what your expectations are about the processing of the data, the nature of the data, and the impact of the processing on you.

### **Information collected from you about other people**

When you provide personal information to us relating to your officers or employees, you confirm that you are allowed to do so. You should ensure that those individuals understand how their data will be used by us.

You may be providing other third-party data to us, for example guarantor and next of kin details about, in which case we will use such data as a data controller in our own right and will comply with data protection legislation in relation to use of that data. You must have the authority to disclose personal data if it relates to someone else and all data disclosed should be complete, accurate and up to date.

### **What we are going to do with your information?**

We will hold and use personal information about you in the following ways:

- Verify your identity and establish the source of funding in any transaction.
- Carry out appropriate anti-fraud checks (by conducting online searches using a third party identity provider). Please note that this will not affect your credit rating.
- Communicate with you during the course of providing our services, for example dealing with your enquiries and requests.
- Communicate with you during the course of the contract.
- Refer you to another department within The Mansion Group Holdings about additional your/our services.
- Statistical purposes so we can analyse figures to help us manage our business and plan strategically for the future.
- Respond to any complaint or allegation of negligence against us.
- Prevent money laundering or terrorist financing in accordance with financial crime regulations.

### **Information we collect about you from others**

Information may be passed to us by third parties in the course of providing our/your services. The processing of this information will be necessary for us to progress with entering into a contract with you, for example seeking references, credit checks etc.

When we obtain information about you from a third party rather than from you directly, we will notify you of any relevant information within a reasonable period, and provide you with details including the type of data and source it came from.

### **How long we keep your data for**

We will only retain your information for as long as is necessary to:

- Fulfill the requirement of the contract.
- Establishment or defence of legal claims (for example negligence claims) that could be made against us.
- Compliance with legal obligations under EU/UK law (anti-money laundering regulations say your identification and source of funds information must be kept for a minimum period from conclusion of the matter).

Typically, we will store the information for 6 years from the date of the termination of the contract/agreement.

### **Who your information will be shared with**

Based upon the services you need we may pass your details to selected people or organisations (data processors) to carry out certain activities on our behalf. For example, personal information you provide may be disclosed to Local Councils, who may keep a record of that information.

We may pass your information to any third parties where required to do so in the course of providing services or, where we are obliged by law. This will include, but is not limited to:

- Our group companies and associated third parties such as our service providers and organisations to whom we provide services.
- Government bodies (such as HM Land Registry or HM Revenue and Customs for property related work).
- External company auditors who may carry out independent checks of your file.
- Other professionals and service providers (such as insurance brokers).
- Organisations involved in any merger or business reorganisation.
- Any disclosures to law enforcement agencies where required by law (in particular the prevention of financial crime and terrorism).
- Our professional indemnity insurer in the event a claim is made against us in order to defend ourselves.
- The bank or building society or other lender providing finance in the transaction.
- The owners of the building you are staying in if applicable.

At the outset of your matter we may not be aware of all the other parties involved as this will depend on the specific nature of the work.

We will not share your information with third parties for marketing purposes unless required to do so under legitimate interest such as our student survey.

### **Security of your data**

Your data will be held on secure servers within the European Economic Area ("EEA") with all reasonable technological and operation measures put in place to safeguard it from unauthorised access. Where possible any identifiable information will be encrypted or minimised.

If we have given you a username and password which enables you to access certain parts of your account on our systems, you are responsible for keeping it confidential. Please do not share it with anyone.

### **Measures when transferring your data to others**

There may be occasions where we need to send your data outside the EEA. This would cover situations where the owner of the property of which you are staying in or are contracted to work on is based outside of the EU.

Some organisations may be located in countries outside of Europe where data protection laws are not as strict as they are in the UK. Where your personal data is being transferred outside the EU, we will undertake an assessment of the level of protection in light of the circumstances surrounding the transfer. We will make sure that any transfers are not repetitive and only limited to the minimum amount of information possible. In certain circumstances we may need to seek your consent unless there is an overriding legal need to transfer the information.

### **How you can access and update your information**

You have a right to request a copy of the personal information we hold about you, known as a data subject access request. You also have the right to request that information we hold about you which may be incorrect, or which has been changed since you first told us, is updated or removed.

These requests are free of charge and can be sent to The Data Protection Officer, 1 Oakwood Square, Cheadle Royal Business Park, Cheadle, SK8 3SB or to [dpo@tmgh.co.uk](mailto:dpo@tmgh.co.uk).

### **How you can object to us using your data**

You can ask us to limit the way in which we are using your information or object to certain types of processing. We will do our best to comply with your request unless we have to use the information for legitimate business or legal purposes.

Please note that if you want us to restrict or stop processing your data this may impact on our ability to provide our services.

Any queries or concerns about the way in which your data is being used can be sent to [dpo@tmgh.co.uk](mailto:dpo@tmgh.co.uk).

### **Moving your information to another organisation**

You have the right to request that we send a copy of the personal data we hold about you to another organisation for your own purposes, for example when you are dealing with a different service provider. If you would like us to move, copy, or transfer your information to another organisation please let us know. We will respond to you within one month after assessing whether or not this is possible, taking into account the technical compatibility with the other organisation in question.

### **Automated decision making**

We do not use your information for automated decision making.

### **Complaints about the use of your personal data**

If you wish to raise a complaint on how we have handled your personal data, you can contact us to have the matter investigated by writing to DPO Officer, 1 Oakwood Square, Cheadle Royal Business Park, Cheadle, Cheshire, SK8 3SB or emailing [dpo@tmgh.co.uk](mailto:dpo@tmgh.co.uk).

If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can complain to the UK data protection regulator, the Information Commissioner's Office. Further details can be found at [www.ico.org.uk](http://www.ico.org.uk) or **0303 123 1113**.