

## 1. Introduction

Unite students (registered as Unite Integrated Solutions) is a subsidiary of The UNITE Group Plc and is the data controller responsible for your data. We are the UK's leading provider of student accommodation and in November 2019 we acquired the Liberty Living group. This privacy notice has been designed with our customers and guarantors in mind, and the ways in which you interact with us. For example, the information we collect if you book a room with us and how we use it will be different to if you only enquire about a room. And when you stay with us, the type of data we collect and how it is used is different again.

This notice covers personal data collected by Unite Students that can identify you as an individual or is capable of doing so. It also applies if you hold or have held a tenancy with the Liberty Living Group. It does not cover general, statistical, aggregated or anonymous information or personal data collected by third party organisations outside of our instruction, or individuals or other websites which the Unite Students website or the MyUnite app may link to. Where this is the case, we encourage you to read their privacy notice to understand how they are processing your data.

We've done our best to make our explanations as clear and transparent about the data we collect as possible, and have broken this notice down into different sections relating to where you are in the customer journey. Each section details the personal data we collect and for what purpose, who we collect it from and who we share it with. Other sections explain how we are meeting our other obligations under data protection legislation.

If you have a question about something in this notice or want to contact our Data Protection team, please see the 'How to Contact Us' section.

For more information about how we use your data:

- If you have applied for a Unite Foundation scholarship, see the [Unite Foundation Privacy Policy](#)
- If you have applied to work with us, see our [Careers Privacy Policy](#).
- If you are part of a Unite Group consumer panel or research group, see the [Unite Group Privacy Policy](#).



## 2. The personal data we process when you interact with uS

When you visit our [website](#), create an account with uS, or contact uS via Unite Student's social media platforms or our Live Chat feature, we will collect the following data, depending on the platform:

- First name, last name
- Account login credentials
- Your contact details depending on how you reach us (i.e. phone number or email address), details about your enquiry, further information to identify you.
- Your activity on our website, behaviour, and interests including the pages you visit.
- Your name as it appears on a social media platform, public profile image and message history
- Your Live Chat ID, your preference to disable Live Chat and any information you give us through Live Chat.

### **This data may be collected for the following purposes:**

- Directly from you to communicate with you and respond to your enquiry, improve our service where we can and allow us to ask security questions to ensure we are speaking with the right person
  - Directly from you and Live Chat performance cookies to provide live customer service chat on our website and identify the device during visits
  - Directly from you if you take part in any online surveys on our website and website user testing
  - From web application cookies - for instance, if you set up your privacy preferences or log into your account, for the website to function, or to implement cookies which act on your cookie preference
  - From optional targeted advertising cookies and optional performance cookies to optimise performance of our website, track and report conversions from Google, remarket a product, personalise our adverts on Facebook or target adverts through paid Google advertising.
- A cookie is a piece of information that is stored on your computer's hard drive by your web browser, or stored as a temporary object in your web browser for the time of that connection. For information about how we use cookies and which third parties we share your cookie data with, and to opt out of performance and advertising cookies, please read our [Cookie Policy](#).

We use a third party to manage our received messages or mentions on social media platforms, so your messages will also be stored on their platform. If you use our Live Chat service, the information is stored by Zendesk who provide the platform for that service, and if you take part in a survey linked to website user testing or actual website user testing, this data will also be processed by a third party.



### 3. The personal data we process when you book one of our rooms

When you book one of our rooms after creating an account, depending on the type of booking, we will collect the following information from you or a group booking if booking direct, or from your university, a booking agent or the Unite Foundation if they are making the booking on your behalf:

- Title, first name, middle name\*, last name, preferred name\*,
- Mobile phone number
- Date of birth
- Gender
- Nationality
- University ID number\*
- Passport number\*
- Landline number\*
- Phone contact preference
- Current living status\*
- Email address
- Home address
- Year of study
- Name of university attending, course subject\*, course title\*
- Alternative email address\*, phone number\* and address\*
- Photo\*
- Disability or medical information (if disclosed)
- Written communications between you and the agent\*\*
- Pre-session start/end date\*\*
- Course and arrival/departure dates (for short-term lets)
- Preference of city and property (for group bookings)
- Invoice address (if booking via a third party website)
- Direct marketing preference(s)

\* = optional

\*\* = if booking via an agent

We use this information to:

- Get you set up on our system and administer your tenancy
- Facilitate your access to internet connection during your tenancy
- Contact you about other products and services we think may be of interest to you (only where you have given your consent)
- Help you book a suitable room or ensure you have the necessary aides, equipment or PEEP (Personal Emergency Evacuation Plan) for your stay
- Conduct surveys to help us measure satisfaction and our performance, improve our service where we can and better understand our customers year on year.
- Provide evidence to local authorities for council tax exemption or the provision of electoral roll services

- Register and protect your deposit, and send you your deposit protection certification (if applicable)
- Keep a record of what has been agreed with the agent and track referred customers for commission purposes (if applicable)

Depending on why we are using your data, we will share it with our internet service provider, your university or third party security service looking after the property you will be staying at, the relevant local authority (council), our third party survey provider, any tenancy deposit protection scheme being used and the emergency services (in the event of an emergency evacuation).

#### 4. The personal data we process during your stay with uS

Once you have moved into your new home, we will collect and use other information from or about you depending on how you use our services and what happens during your stay with uS. This includes:

- Your conversation history in Uchat, initials, tenancy address, phone number and location, to provide you with [the MyUnite app features](#), if you have downloaded the app. This information may be shared with the other occupants of your (future) flat who have installed MyUnite Uchat and third party security services, if contracted for your building, if you report a lock-out.
- Your name and room number on a parcel, to notify you of a delivery and for our internal parcel management records
- Your room number, flat and property details, reason for self-isolating and date you registered as self-isolating, if you submit this information via the MyUnite app, or any other means, to advise uS that you are self-isolating in line with government advice on Covid-19. We use this information to allow uS to take extra precautions to keep you and our teams safe.
- CCTV images of you in the property or an external area covered by our CCTV cameras. We use CCTV to prevent and detect criminal activity, fraud and misuse of or damage to our property.
- Relevant account information and details of any accident or incident you are involved in that is reported to uS. We use this to carry out an investigation and may also be given information by any third party that was also involved.
- Details about a concern regarding your health or wellbeing which you disclose to uS. If you give your consent, we will share this data with an agreed individual or organisation so they can (continue to) support you.
- Images of you if you attend one of our events which is filmed or photographed, or are involved in one of our video or photoshoots. These images could be used for internal presentations, our intranet and/or made public on our website and published promotional material.
- Your account details, account balance, name, email address and tenancy address; these will be used if you fall into arrears. We will try to collect arrears internally, however, if unsuccessful and depending on where you are in the arrears process, we may share this data with:
  - our internet provider to disconnect your internet connection

- your guarantor
  - an external law firm to initiate the eviction process **or**
  - a third party debt collection company if you are still in arrears at the end of your tenancy and need to be referred
- Data relating to a complaint (this may come from you or from ANUK (Accreditation Network United Kingdom) via their complaints process. If we have received a complaint from you, if necessary, we will share details of this and your identity with ANUK.

### After your stay

If you need uS to provide a reference after you move out, we will provide information relating to your tenancy as requested by the landlord or letting agent, with your consent. The information shared will vary depending on the reference request and may include tenancy start/end dates, tenancy address, weekly/monthly rent price, confirmation that your payments are up to date, and confirmation of any damage charges you have incurred.

### Hotel stays

At some of our properties we offer a hotel accommodation service. If you stay with us under such a booking we ask for your name, title, nationality, Passport/ID number, place of issue and address of next destination when you check in. This information is stored for us to comply with the Immigration (Hotel Records) Order 1972. If requested by the police or any person authorised by the Secretary of State, we are obliged to share your data.

### Aggregated data

Occasionally, we provide aggregated statistics about our sales, customers, traffic patterns and other site information to third parties, but these statistics do not include any information that could personally identify you.

## 5. The personal data we process for work experience opportunities

We offer various volunteering opportunities to our customers and also have a Student Ambassador programme. Depending on what you apply for/take part in, we will ask you to provide:

- **Volunteering as a Vlogger or Influencer:** Your name, contact, property, university and course details, link(s) to your personal blog, website or social media accounts and any images from content produced for you. This is used to offer future potential customers relatable insight of student living and living with us via our platform. Some content you produce may be uploaded to our website and social media accounts, including Facebook, Twitter, YouTube, WeChat and Instagram.
- **Applying to be a volunteer Student Content Creator for The Common Room:** Your name, contact, property and university details and your international student status (if applicable). If

you provide an author bio, this will be displayed alongside articles and on author pages on the Unite Students website along with your first name and university.

- **Applying to be a Positive Impact Consultant or Auditor:** Your name, contact details, any property access requirements and the reason for your application. This data would be used to support the Positive Impact audit process and increase student-staff collaboration within Positive Impact. It would be shared with the National Union of Students (NUS) so they can send you a letter of recommendation at the end of your post.
- **Applying to become a brand ambassador:** Your name, contact details and your video interview. This data will be stored by a third party until your application is accepted/rejected.

## 6. The personal data we process if you are a guarantor, emergency contact or named person on the account

If you have agreed to be a guarantor, emergency contact or the named person for a customer, depending on your role, we will collect the following information from you, the person booking our services or the customer holding the account:

- Title, first name, last name
- Email address
- Contact phone number
- Relationship to customer
- Gender
- Date of birth
- Nationality
- Home address
- Level of account access

If you are a **guarantor or named person** on the account, this may be used to:

- Prove you are 25 years or older, interested in the customer's welfare and have an existing relationship with them.
- Confirm your identity and respond to account-related queries
- Contact you and arrange payment if the customer has failed to make a payment. If referred after the tenancy has ended, we may share your data with a third party credit collection company (guarantor)
- Notify you if the customer has breached their tenancy agreement and subsequent updates
- Notify you of any unforeseen changes to the tenancy
- If you are an **emergency contact**, in the event of an emergency, we will share your contact information with the medical or emergency services as necessary, enabling them to reach and update you about an incident affecting the customer

## 7. Sharing your personal data when required by law

Our purpose for using your data may change where it is necessary to do so to protect or defend our legal rights or the legal rights of others. In these instances we may disclose the information you give us /we receive in order to comply with the law and our regulatory obligations. This information will be used as necessary, including to investigate, prevent or take action regarding illegal activities, suspected fraud, or situations involving potential threats to the physical safety of any person.

If we sell our business we will transfer information relating to tenants and guarantors to the new owner. If we sell a property only information relating to the current academic year would be transferred. In all instances we will ensure that your data is transferred securely.

## 8. Our lawful bases for processing your data

Data protection law requires us to have a lawful basis for using your personal data. At least one of the following must apply: consent, contract, legal obligation, legitimate interest, public interest or vital interests. In this section we explain which one we rely on when we use your data in a certain way, as detailed in the previous sections.

### **We use your information for the performance of our contract with you:**

- When you create an account, or when you or a third party acting on your behalf signs a tenancy agreement with us or registers a group booking
- When you are in arrears
- When you apply to become a Student Ambassador or are paid to take part in a video or photoshoot
- To notify you of a parcel delivery

### **We use your information for our legitimate business interests for the following:**

- When you visit our [website](#) or log in to your account
- When you contact us with an enquiry, a complaint, or provide other feedback to us on any Unite Students channel
- When we provide you with internet connection
- To support our teams and the universities our customers go to with managing a local outbreak of Covid-19
- To conduct customer satisfaction surveys
- To use CCTV in and outside of our buildings
- When you are in arrears (to share your data with a debt collection company)
- When you volunteer with us (for the Positive Impact scheme or in a photoshoot)

### **We must have your consent to use your data for the following purposes:**

- To market directly to you about other products and services we think may be of interest to you
- To process any medical, or disability or health and wellbeing information we hold on you (if disclosed)

- When you volunteer with uS (as a Student Content Creator, Vlogger or Influencer)
  - To use images of you taken at one our events
  - To provide a reference to a potential landlord or agency
- We have a legal obligation to use your information:**
- As evidence to local authorities for council tax exemption or the provision of electoral roll services.
  - To support Public Health England and local authorities with managing a local outbreak of Covid-19
  - To register and protect your deposit (if applicable)
  - To assist you with a Personal Emergency Evacuation Plan (PEEP) (if applicable)
  - As part of any accident or incident investigation and records involving you
  - When you check in for a hotel booking

**Guarantor data:** Our lawful basis for collecting your personal data will be performance of a contract (guarantor), legitimate interest (emergency contact) and consent (named person).

## 9. How long we keep your information

The periods for which we keep your information will vary according to the purpose for which we use the information. To work out how long we keep each data record for, we consider why we hold it, how sensitive it is, how long the law says we need to keep it, and what the risks are.

Unless there is a specific legal requirement to keep your information, we will not keep it for longer than necessary for the purposes for which it was collected or for which it is to be further processed. We have an internal data retention schedule that details how long we keep each data record and we will securely delete your information in line with this.

## 10. How we protect your information

We have several security measures in place to protect your information:

The encryption of the personal data submitted by you and collected by uS via our website and other online platforms is maintained to the highest industry standard level. Where you have a password, which enables you to access your account and certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share your password(s) with anyone.

Personal data is stored in a secure system with restricted access areas depending on the type of data being stored. We have strict security procedures covering the storage and disclosure of this information in order to prevent unauthorised access. Our employees can only access data that is appropriate and necessary for their role and we carry out identity verification checks before disclosing any personal information.

Where we use third party service providers, we disclose only the personal information necessary for them to deliver the required services. We carry out security due diligence to

ensure they have satisfactory security and confidentiality measures in place, and contracts are in place to ensure they only use it for the purpose for which it was intended.

## 11. Your rights in relation to your personal data

You have various rights relating to your personal data, which we have summarised below. To exercise any of these rights, please contact [dataprotection@unitestudents.com](mailto:dataprotection@unitestudents.com). We process and respond to all requests regarding personal data within one calendar month, but if the request is going to take longer to process we will advise you of this.

We may ask for additional information to verify your identity to ensure we are sharing personal data with the correct person or that we believe is necessary to comply with a request. Please note that whilst we will carefully assess every request we receive, we may not always have to comply. When this happens, we will explain why.

### Your right to be informed

You have the right to be provided with clear, transparent and easily understandable information about how we use your personal data and your rights. Therefore, we are providing you with the information in this privacy notice.

### Your right of access

You have the right to access the personal data we hold about you.

### Your right to correct the personal data we hold on you

You have the right to correct, amend or update your personal data if it becomes inaccurate or incomplete.

### Your right to erase your personal data

You have the right to ask us to erase your personal data although, for legal reasons, we might not always be able to do it.

### Your right to restrict the processing of your personal data

You have the right to restrict, 'block' or suppress further use of your information if:

- the accuracy of your personal data is contested;
- your personal data has been processed unlawfully by us but you do not want to request erasure; or
- we no longer need your personal data for our original purpose but it is required to establish, exercise or defend legal rights.

When processing is restricted, we can still store your information but may not use it further.

We keep records of people who have asked for further use of their information to be 'blocked' to make sure the restriction is respected in the future.

### Your right to consent and/or withdraw consent

If you have given your consent to allow us to process your personal data, you also have the right to withdraw your consent at any time

### Your rights in relation to automated decision making including profiling

Automated decision making is a decision made by automated means, without any human involvement, which has legal consequences or something to a similar effect (e.g. credit

checking). We don't typically carry out automated decision making, but if we were to, we would make it clear where decisions are being made.

### **Your right to data portability**

You have rights to obtain and reuse your personal data for your own purposes in a commonly used machine-readable format, and to have your personal data transferred to another data controller on your request.

### **Your right to object to processing**

You have the right to object, on grounds relating to your situation at any time, to the processing of your personal data that is based on us exercising our legitimate interests. If we can show compelling legitimate grounds for processing your personal data which we consider override your interests, rights and freedoms, or we need your personal data to establish, exercise or defend legal claims, we can continue to process it. Otherwise, we must stop using the relevant information.

You have the absolute right to object at any time to the use of your personal data for direct marketing purposes.

### **Your right to make a complaint**

If you are unhappy about the way in which we have used your personal data, please let us know by contacting us as detailed below and we will try to resolve your complaint. If we are unable to resolve your complaint to your satisfaction, you have the right to lodge a complaint about the way we handle or process your personal data with the Information Commissioner's Office.

## **12. Updates to this Privacy Notice**

This notice was last updated on: 8th October 2020.

Historic versions can be obtained by contacting us. Please see how to contact uS below.

If we change the way in which we use or share your personal information we will send you a just-in-time notice or update this Privacy Notice. We will notify you of any significant changes and where necessary, will obtain your consent before using your personal information for any new purpose.

## **13. How to contact uS**

If you have any questions about the above, or our approach to privacy, our dedicated Data Protection team is here to help.

- Write to us at: Data Protection Team, Unite Students, South Quay House, Temple Back, Bristol, BS1 6FL
- Email us at [dataprotection@unitestudents.com](mailto:dataprotection@unitestudents.com)

