

Campus Living Villages Privacy Policy

Policy Issue Date: 22 November 2021

Campus Living Villages UK Limited ("**CLV**") is a company registered in England and Wales (company number 06604874) at 7th Floor Digital World Centre, 1 Lowry Place, The Quays, Salford M50 3VB.

CLV respects your privacy and is committed to protecting your personal data. This Privacy Policy (together with any other documents referred to on it) explains how we collect and use your personal information, in accordance with the EU General Data Protection Regulation its UK equivalent (both termed 'GDPR' in this Privacy Policy') and the Data Protection Act 2018.

It applies when you use our website, when you interact with us through social media, email, phone or in person and also when you participate in our competitions or events.

With that in mind, you should consider that this Privacy Policy applies to you if you are a:

- > resident;
- > prospective resident;
- > guarantor;
- > prospective guarantor;
- > guests of a resident;
- > prospective employee;
- > business customer;
- > supplier or contractor;
- > prospective supplier or contractor; or
- > website visitor

It is important that you read this Privacy Policy, together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing your personal information (or 'personal data' as defined under the GDPR), so that you are fully aware of how and why we are using it. This privacy notice supplements the other notices and is not intended to override them.

Who we are

This Privacy Policy applies to Campus Living Villages UK Limited, together with its subsidiaries and associated companies (referred to herein as "**CLV**", "**we**", "**us**" or "**our**"). A list of these entities can be found at the end of this Privacy Policy.

These companies may make up the "**joint data controllers**" and decide how your personal information is held and used.

Personal information we have about you and what we will do with it

We may ask you to provide us with certain personal information about you. You don't have to give us any of this information, but if you don't you may not be able to use our services and you are unlikely to receive the customer experience, we want to give you.

We use your information in a number of different ways depending on what that information is. The table below sets out what information we need, what we will do with it and the purpose in detail.

Some or all of these may be applicable to you.

Information	How we use that information	Why?
Your name and contact details	To allow you to register on our resident portal	We need this so we can enter into a contract with you and perform our obligations under that contract
	To ensure our contract with you is drawn up correctly	We need this so we can enter into a contract with you
	To send you service messages and information about matters that affect you or your room during your stay at the Village	We've got to do this so we can perform our contract with you, but we also want to provide you with a great service
	To let you know about Village Life activities at your Village	We want to give you opportunities to meet other residents but also want to give you opportunities to improve your wellbeing where we can
	To send you information about our business, new products, and services	To keep you up to date and to help us grow and improve our business
	Fraud prevention and detection	To prevent and detect fraud against either CLV or you
	To show you CLV adverts as you use the internet	So you can see our latest offers
	To find out what you, and other customers, like	So we can make sure we are giving you what you want, and to stay ahead of the competition
Your date of birth	Fraud prevention and detection	To prevent and detect fraud against either CLV or you
	To know if we need to make any adjustments for you (e.g., if you're under 18)	If you're under 18 there are some additional things, we will need to do to make sure we treat you fairly and stay inside the law, including meeting our Health and Safety obligations

Information	How we use that information	Why?
Your gender	To make sure we put you in the best room for you	To give you the best experience with us possible
Your nationality	Fraud prevention and detection	To prevent and detect fraud against either CLV or you
Your student ID (or a suitable alternative)	To confirm that you are a student	You need to be a student to stay at our properties
	To be able to provide evidence to your Village's local council that you are a student	We need to apply for an exemption on your behalf so that we don't have to pay council tax we shouldn't have to
What University you go to and what course you're on	To confirm that you are a student	For commercial and security purposes including for the purpose of gaining council tax exemptions
	So that we can contact your University if we need to (we will only do this where we have a legal basis for doing so)	For your welfare
Your photograph	To confirm your identity	Commercial and security purposes
Information about whether you're a care leaver or young adult carer	So that we can take into account your personal circumstances and are able to point you in the direction of information that may be suitable for you (such as financial support or mental health support)	We want you to have a great experience at the Village and want to be able to direct you to information which can help with any challenges our residents are facing.
	So we can take your personal circumstances into account if we need to recover any amounts due to us	We want to treat you fairly if you are having financial difficulties as a result of commitments you have outside of university
Personal information relating to your stay with us (e.g. the date you first move in, the date you'll be moving out, your room number etc.)	So we know where and when you'll be staying with us	To perform our contract with you and for building management purposes
	Administration relating to your stay with us	We've got to do this to perform our contract with you
	To know what marketing material will be appropriate for you	So you can see our latest offers
Your payment information (your bank account details and payment card information)	To take payments and give refunds	We've got to do this to perform our contract with you
	Fraud prevention and detection	To prevent and detect fraud against CLV and you
	Administration relating to your stay with us	We've got to do this to perform our contract with you

Information	How we use that information	Why?
Accounting data for commercial customers and suppliers	To determine what charges are unpaid or paid	To fulfil our legal obligations
	Fraud prevention and detection	To prevent and detect fraud against CLV
Your contact history with us (e.g. what you've said to us over the phone, via email or on social media)	To provide customer service and support	We need to do this so that we can perform our contract with you
	Administration relating to your stay with us	We've got to do this to perform our contract with you
	Fraud prevention and detection	To prevent and detect fraud against either CLV or you
	To handle any complaints you may have	To provide you with the best service possible and to improve our business
	To know what information about our new products and services may be of interest to you	To keep you up to date and to help us grow our business
	To train our staff	So that you get the best customer service from us
Information about your phone or laptop (e.g. information you give us when you browse our website, including your IP address and, if you choose to share it with us, your location data and how you use the website)	To improve our website	To give you the best possible experience
	To protect our website	To prevent and detect fraud against CLV and you, and to meet the legal obligations we have with respect to looking after your data
Your User ID and password for our resident portal	To allow you to register on and use our resident portal	We need this so we can enter into a contract with you and perform our obligations under that contract.
CCTV footage of you	For security, to secure our buildings, and to safeguard residents, staff and other third parties at our Villages	We need to do this to perform our Contract with you and as an employer
Electronic door access logs	Administration relating to your stay with us	We've got to do this to perform our contract with you
	Fraud prevention and detection	To prevent and detect fraud against either CLV or you
	For security, to secure our buildings and to safeguard residents, staff and other third parties at our Villages	We need to do this to perform our contract with you and as an employer of our staff
Your responses to surveys, competitions, and promotions	So we can run the survey, competition, or promotion	We need to do this to perform our contract with you – and it means you could win! We use your

Information	How we use that information	Why?
		feedback to improve our business.
Health information (such as details of any disability you may have, or any health issues or conditions which we may need to take into account)	So we can provide additional support to disabled individuals when required	We need to do this to comply with our legal obligations and provide you with a safe and comfortable environment to stay
	So we can plan evacuations and evacuate disabled residents safely	We need to do this to comply with our legal obligations
Welfare and behaviour information (e.g. information about your behaviour whilst residing in the Village (such as being in debt, incidents involving the police) as well as information about your wellbeing where we are, or someone else is, concerned about you)	To safeguard residents, staff and other third parties at our Villages	We need to do this to perform our contract with you and as an employer of our staff
Personal data related to individuals applying for jobs at CLV	To allow us to review and process any applications we receive	We need to do this to recruit new employees
Personal data related to business customers	To allow us to manage your account administration as well as our working relationship and any contract that is in place	We need to do this to perform our contract with you
Personal data related to suppliers/contractors	To allow us to manage your account administration as well as our working relationship and any contract that is in place	We need to do this to perform our contract with you

Aside from information you give us directly during your time with us, we might gather information about you as a result of our contact with you.

We may process special categories of personal information in the following circumstances:

- (a) with your explicit consent;
- (b) where it is needed in the public interest; and
- (c) less commonly, where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We will only use your personal information for the purposes for which we collected it. However, we may need to use it for another reason. If that is the case and the reason is compatible with the original purpose, we will use it without contacting you but, if the purpose is different, we will notify you and will explain the legal basis which allows us to use it.

Information you give us about other people

We may ask you to provide information about other people. Before doing so, please make sure that you have asked their permission and that you have made them aware of this Privacy Policy.

Information	How we use that Information	Why?
Information about your next of kin (their name and contact details)	We will contact the next of kin in the event of an emergency – but only after the legality of this has been considered. See 'Sharing sensitive information'	To protect your vital interests
If you're under 18; details about your parent or guardian	We will need to get their permission to contract with and communicate with you in some circumstances	To comply with our legal obligations
Information about your guarantor (their name and contact details)	We will contact the guarantor in the event of non-payment by the resident.	To ensure that all debts are paid as per the resident's contract with us
	Please note that if you (as parent/guardian) do not pay all monies owed by the resident under their contract CLV may provide your details to a debt collection agency	

Information other people give us about you

When someone makes an application to stay with us on your behalf (such as an agent) or you apply through your university, we will use your personal data in accordance with this policy. We will also contact you to clarify what information has been sent to us and where the information came from.

Who we share your information with

We may disclose your personal information about you (that you have given us, that someone else has given us or that we have obtained ourselves) to third parties in the following circumstances:

- > when we are legally required to;
- > when we have to perform our contract or, if there is no contract, any obligations as part of our working relationship with you;
- > where we have another legitimate interest in doing so; or
- > to protect the rights, property, or safety of CLV, our customers, or others - including exchanging information with other companies and organisations for the purposes of fraud protection, crime prevention and credit risk reduction.

We may share information with (as relevant):

Third Party	Why we may share your personal information
Your University	Where the university requires such information for administrative or pastoral purposes, or for the purpose of safeguarding student welfare
	Where a contract is in place between us and your university for the provision of accommodation to their students and we need to give them information under that contract
Suppliers and sub-contractors	Where we rely on external suppliers in order for us to comply with the terms of your contract with us
	Where you have ordered goods and services that must be delivered by someone else
To prospective buyers or sellers	If we sell or buy any business or assets (in which case, we may disclose your personal data to the prospective seller or buyer of such business or assets)
Your guarantor	Where you are in breach of your contract, and we have no other choice than to involve your guarantor
Your next of kin	Where we feel it is appropriate for us to contact them as a result of an emergency, for example. Please see 'Sharing sensitive information'
Your Village's local council	Where we are under a legal obligation to disclose information about you.
	In order to discuss council tax bills, we might receive in relation to your accommodation and to seek an exemption on your behalf
Our debt collection agency	We use debt collection agencies in order to recover amounts due to us
Our insurers	Where it is in our best interests to involve our insurers in relation to queries and claims
Our auditors, accountants, lawyers, and other professional advisors	In order to enforce or apply our terms of use and other agreements
IT service providers	We may disclose your personal data to third parties including internet service providers, IT system providers, web application service providers, data back-up providers, mail hosting providers, customer management systems, call recording systems, postal package tracking systems, asset tracking systems and those who provide web analytics services to us (including, for example, third parties who analyse our users' online behaviour in order to improve the way in which we advertise and market goods and services)
Our service providers	We may disclose your personal data to third parties who help us provide our services to you such as security companies or ICT infrastructure providers. In particular, we will share your personal data with StarRez Pty Ltd , which hosts the online portal through which you apply for student accommodation
Statutory bodies	Where we are required to provide information by law to statutory bodies, we will do so
Banks, card payment gateways and other financial institutions	In addition to needing to process payments we may send your details to credit reference agencies and fraud prevention agencies

Third Party	Why we may share your personal information
Emergency services	Where it is appropriate for us to contact them as a result of an emergency and need to provide your personal information to ensure your wellbeing
Marketing agencies	Where we outsource our marketing to you
Other entities within the CLV group and our joint venture partners	Sometimes different companies within our group are responsible for different activities and our joint venture partners may require access to information

We may provide third parties with anonymized information and analytics about our customers, which is not considered personal data and is not covered by the GDPR or Data Protection Act 2018.

Sharing sensitive information

If we are concerned about the welfare or behaviour of a resident we may share this information with third parties wither in their vital interest, the public interest, or in accordance with other exceptions permitted under data protection law.

The third parties that we would share this information with, if we do, would usually be:

- > the University of the resident (e.g., the University welfare office);
- > the guarantor of the resident (in the event of non-payment of any money due which, dependent upon the circumstances, may be considered by CLV to be a behavioural issue);
- > healthcare professionals such as a local authority mental healthcare team; and
- > the emergency services.

We may share this data without the consent of the individual it relates to, particularly if it would be in the vital interests of the resident or if it is in the public interest.

In highly exceptional circumstances CLV may contact the next of kin (whose details will have been provided by the individual) to share welfare or behavioural information.

CLV will ensure that this information only shared with third parties after careful consideration of the individual's rights. Such a decision will be made by a senior member of CLV staff.

Your information and countries outside Europe

We will transfer the personal information we collect about you to the following countries outside the UK and the EU in order to perform our contract with you:

- > New Zealand
- > United States of America
- > Australia

Where there is no adequacy decision by the European Commission in favour of the recipient country, and to ensure that your personal information receives an adequate level of protection, we have put in place the following appropriate measures to ensure that your personal information is treated in a way that is consistent with and which respects the EU and UK laws on data protection: a data sharing agreement with the relevant entities in the CLV group in Australia and the United States of America comprising standard contractual clauses adopted by the European Commission for such purposes and ensuring those roles potentially having access to the personal data have completed UK specific GDPR training.

Where we use suppliers or service providers who process data outside of the UK/EU/EEA, we will take all reasonable steps to ensure that a reasonable level of data protection is established with the recipient before transferring your personal data. If you require further information about international transfers, you can contact us using the contact details under 'How to contact us'.

How long we will keep your information for

We will only keep your information for as long as is necessary to fulfil the purposes we collected it for (including for the purposes of satisfying any legal, accounting or reporting requirements). When we decide how long we should keep it for we consider:

- > the amount, nature, and sensitivity of that personal information;
- > the purposes for which we process it;
- > whether we can achieve those purposes through other means; and
- > the applicable legal requirements.

In some circumstances, we may anonymise your personal information so that it can no longer be associated with you, in which case we may use that information without further notice from you.

Promotions and offers

We may use your personal data to send you marketing communications about goods, services and offers by post, email, and social media.

You have the right to ask us not to process your personal data for marketing purposes. You can exercise your right to prevent such processing by checking the relevant boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us using the contact details under ['How to contact us'](#).

Your rights

You have certain rights relating to your personal information:

- > The right to be informed about how your personal information is being used (like this Privacy Policy);
- > The right to access the personal information we hold about you (commonly known as a "data subject access request");
- > The right to ask us to correct any inaccurate personal information we hold about you;
- > The right to ask us to delete your data, stop doing anything with it, or restrict our use of it in some circumstances;
- > The right to stop direct marketing messages, and to object to any processing of data we are able to use because we have, or a third party has, a legitimate interest in doing so;
- > The right to ask that we transfer elements of your data either to your or another service provider; and
- > The right to complaint to the Information Commissioner's Office.

If you want to exercise your rights, please contact us using the contact details under 'How to contact us'.

Cookies

We use cookies on our website. Please see our Cookie Policy for further information.

Changes to our privacy policy

We may update this Privacy Policy at any time. We will provide you with a new Privacy Policy when we make any substantial changes. We may also notify you from time to time about the processing of your personal information.

This Privacy Policy has been in effect since 23 May 2018.

How to contact us

If you have any queries about how we collect, store, and use your personal information, or if you have any other privacy-related questions, please contact us by any of the following means:

- > **Phone us:** 0161 667 9800
- > **E-mail us:** privacy@clvuk.com
- > **Write to us:** 7th Floor Digital World Centre 1 Lowry Plaza, Salford Quays
Manchester M50 3UB

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would however appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

List of CLV legal entities that this privacy policy applies to

The legal entities in the table below represent the 'joint data controllers' within the CLV group:

Entity Name	Supervisory Authority and Jurisdiction
Campus Living Villages UK Limited	ICO
Campus Living Villages (Bedfordshire) UK Limited	ICO
Campus Living Villages (Salford) UK Limited	ICO
Campus Living Villages (Cranborne) UK Limited	ICO
Campus Living Villages (City Portfolio) UK Limited	ICO
Campus Living Villages (Sutton Bonington) UK Limited	ICO
Campus Living Villages (Goldsmiths) UK Limited	ICO
Salford Village Limited	ICO
Campus Living Villages (RCM 2) UK LLP	ICO
Campus Living Villages (Bournemouth 1) UK LLP	ICO
Campus Living Villages (Durham) Operations Limited	ICO
CLV (St Andrews) UK LLP	ICO
CLV (St Andrews) UK 2 LLP	ICO
CLV (St Andrews) UK 3 LLP	ICO