

# THE STAY CLUB

## LONDON STUDENT ACCOMMODATION

1. Purpose of Notice
2. Who We Are
3. Who This Notice Applies To
4. When This Privacy Notice Applies
5. What We Are Responsible For
6. Data Protection Principles
7. What We Mean By Personal Information
8. How We Collect your Personal Information
9. What Personal Data We Collect About You
10. Why We Collect Your Personal Data
11. Internet Data
12. How Long We'll Keep Your Information
13. How We May Use Information About You
14. Sharing Welfare or Behavioural Information
15. If You Fail to Provide Your Personal Information
16. Opting Out
17. Change Of Purpose
18. Data Transfers
19. Disclosing Your Information To Other Third Parties
20. Data Security
21. Your Rights In Relation To Your Personal Information
22. Cookies
23. Changes To This Notice

# THE STAY CLUB

## LONDON STUDENT ACCOMMODATION

### 1. Purpose of Notice

The Stay Club is committed to complying with UK government and EU legislation (General Data Protection Regulation EU 2016/679 of the European Parliament and of the Council; "GDPR") and to protecting the privacy and security of your personal information. This Notice describes who we collect and use your personal information, in accordance with relevant legislation.

### 2. Who We Are

The Stay Club is a group of legal entities that develop and operate student accommodation, professional accommodation and workspaces, and accredited English Languages and college courses, herein referred to as "The Stay Club", "we", "us" or "our".

The list of entities this Privacy Notice applies to includes:

- Stay Campus College
- Stay Campus London
- Stay Professional
- The Stay Club Student Accommodation (including The Stay Club Camden, The Stay Club Colindale and The Stay Club Willesden (also known as Nicoll Studio Ltd))

### 3. Who This Notice Applies To

This Privacy Notice applies to the following groups of people:

- Tenants (including prospective tenants)
- Business customers
- Suppliers/contractors (including prospective)
- Tenant guests and employee visitors
- Job applicants
- The Stay Club website users

# THE STAY CLUB

## LONDON STUDENT ACCOMMODATION

- Any other persons not employed by The Stay Club

#### 4. When This Privacy Notice Applies

This Privacy Notice applies to personal information collected by The Stay Club; it does not apply to any collection of personal information by third party companies, individuals, organisations or via other websites which The Stay Club website may link to. Where third parties collect your personal information, their own privacy policies will apply. We urge you to read these carefully.

#### 5. What We Are Responsible For

The Stay Club is a “data controller”; this means that we are responsible for deciding how we collect, hold and use your personal information. We are required under GDPR to notify you of the information contained in this privacy notice. We may update this notice at any time.

It is important that you read this notice, together with any other privacy notices or information we may provide on specific occasions when we are collecting or processing your personal information, so that you are aware of how and why we are using such information.

#### 6. Data Protection Principles

The Stay Club will comply with data protection law. This says that any personal information that we hold about you must be

- Used lawfully, fairly and in a transparent way
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
- Relevant to the purposes we have told you about and limited to only those purposes
- Accurate and up to date
- Kept only as long as necessary for the purpose we have told you about or as long as legally required
- Stored securely

# THE STAY CLUB

## LONDON STUDENT ACCOMMODATION

### **7. What We Mean By Personal Information**

When we refer to personal information in this Privacy Notice, we mean information about an individual from which that person can be identified. By personal information we don't mean general, statistical, aggregated or anonymous information.

### **8. How We Collect your Personal Information**

We may collect your personal information in several ways, for example

- When you communicate with us by telephone, in person, via email or our website
- When you submit digital or hard copy documents relating to a booking/tenancy
- When we receive information from third parties
- If you request additional services or raise concerns
- When you provide payment details
- When you browse our website
- When you subscribe or ask to be included in an email or other mailing list
- When you respond to our promotions or other marketing and publicity initiatives
- When you respond to marketing surveys
- When you submit a job application
- When you submit your personal data to us for another reason
- When you access public areas with CCTV monitoring

### **9. What Personal Data We Collect About You**

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows

- Identity data - includes first name, last name, username or similar identifier
- Contact data - includes billing address, delivery address, email address and telephone numbers
- Biometric data – copies of passports and ID cards only

# THE STAY CLUB

## LONDON STUDENT ACCOMMODATION

- Academic data – includes student status
  
- Geographic data - third parties such as MailChimp, which we use for marketing communication may collect information such as your longitude and latitude. Data such as this will be covered under their privacy policies; The Stay Club will not seek to use such data for any purpose
  
- Immigration data – includes immigration status and country of citizenship
  
- Financial data - including limited payment card details
  
- Transaction data - includes details about payments to and from you and other details of products and services you have acquired from us or us to you
  
- Technical data - includes internet protocol (IP) address, browser type and version, location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website
  
- Usage data - includes information about how you use our website, products and services
  
- Marketing and communications data - includes your preferences in receiving marketing from us and your communication preferences as well as correspondence to/from The Stay Club, including emails, web form/chats, telephone call logs and recordings
  
- Other data required to provide a service to you – includes:
  - Health and safety data including accident book and fire alarm activation records
  - Building access data including electronic door access and lock out/temporary key logs
  - Asset tracking data
  - Building access data including electronic door access and lock out/temporary key logs
  - CCTV recordings of communal areas

# THE STAY CLUB

## LONDON STUDENT ACCOMMODATION

We also collect, use and share aggregated data such as statistical or demographic data for any purpose.

Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

Occasionally we may receive health data or other sensitive data from a tenant without having requested this information. An example of this being when a tenant may email us a doctor's letter that we have not requested. In this situation, we will deem that the tenant has provided explicit consent for us to process this data.

Special categories of data we collect are limited to biometric only, specifically ID Cards/Passports. These are collected and required for legitimate interests including resident identification and safeguarding. All other Special categories of data are not routinely collected however, we may do so if required for legitimate interests. These include but are not limited to details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic data or criminal conviction and offenses data.

### **10. Why We Collect Your Personal Data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Legitimate commercial, operational or financial interest
- To perform a contract with you
- To comply with legal obligations, including health and safety
- Marketing
- Fraud prevention
- Informing you about relevant Stay Club activities
- Staff training

# THE STAY CLUB

## LONDON STUDENT ACCOMMODATION

- Security and welfare
- Complaint management

### **11. Internet Data**

Although we provide free internet access within our residential buildings, the internet connection is controlled and managed exclusively by a third party on our behalf. In addition, this third party owns all the internet management hardware within the building. This third party is currently Cablecom Networking Limited (operating as Studentcom) of 1 Rivermead Court, Kenn Business Park, Windmill Road, Kenn, Clevedon, BS21 6FT. As we have no authority or ability to access personally identifiable information passing over the internet connection Cablecom Networking Limited is deemed to be the data controller of the internet data. Unless otherwise notified, this will continue to apply regardless of any future changes to the provider of this service.

### **12. How Long We'll Keep Your Information**

We will only retain your personal information for as long as it is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and 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 such information without further notice to you.

### **13. How We May Use Information About You**

We will only use your personal information as and when the law allows us to. Most commonly, we will use your personal information as follows:

- Contractual – where we need to perform a contract we have entered into with you (or vice-versa for suppliers/contractors)

# THE STAY CLUB

## LONDON STUDENT ACCOMMODATION

- Legal requirement – where we need to comply with a legal obligation
- Legitimate interest – where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights not override those interest
- Vital interest – we need to protect your or someone else's interests
- Public interest – were it is required in the interest of the wider public of official purposes

### **14. Sharing Welfare or Behavioural Information**

In certain circumstances, where we are concerned about the welfare or behaviour of a tenant or user of The Stay Club website or premises, we may share this information with third parties in the interest of the data subjects, public interest, or in accordance with other exceptions permitted under data protection law. Where information of this nature is shared, it will usually be one of the third parties listed below

- The tenant's university/educational establishment (e.g. university welfare office)
- Healthcare professionals (e.g. local authority mental healthcare team)
- Emergency services

We have suitable safeguards, policies and procedures in place to ensure this information is treated confidentially and is only shared with third parties after careful consideration.

We may share this data without consent of the data subject especially where it is in the public interest, the vital interests of the tenant or necessary to comply with proper safeguarding practises.

In highly exceptional circumstances, we may also contact emergency contact persons to share welfare or behavioural information. However, any decision to share this information can only be authorised at the highest level of the organisation and after careful consideration for the data privacy rights and freedoms of the tenant.



# THE STAY CLUB

## LONDON STUDENT ACCOMMODATION

### **15. If You Fail to Provide Your Personal Information**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with products or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### **16. Change Of Purpose**

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for a different purpose, we will notify you and we will explain the legal basis which allows us to do so. If required, we will seek your consent.

Please note that we may process your personal information without your knowledge or consent, where this is required or permitted by law.

### **17. Data Transfers**

Data we collect may be transferred to, stored and processed across international borders.

### **18. Disclosing Your Information To Other Third Parties**

We may share your personal information with the following categories of recipients

- IT service providers, including internet service providers, IT system provider, web application service providers, data backup providers, mail hosting providers, customer reservation and management systems, call recording systems, postal package tracking systems, asset tracking systems
- Organisations providing legal services
- Health and safety advisors
- Auditors, accountants, lawyers and other professional advisors
- Statutory bodies where we are required to share data
- Banks, card payment gateways, merchant acquirers, and other financial services organisations

# THE STAY CLUB

## LONDON STUDENT ACCOMMODATION

- Debt collectors and credit reference agencies
- Emergency services
- Universities and other educational establishments
- Local authorities
- Organisations requesting landlord references
- Investors
- Tenants
- Contractors working for The Stay Club including security contractors, maintenance contractors, IT contractors and other relevant contractors
- Insurers

### **19. Data Security**

Information system and data security is imperative to us to ensure that we are keeping our customers and contractors safe.

We operate a robust and thorough process for assessing, managing and protecting new and existing systems which ensures that our systems are up to date and secure against the ever-changing data protection threat landscape.

### **20. Your Rights In Relation To Your Personal Information**

You have various rights relating to your personal data, which we have summarised below. To exercise these rights please contact [dataprotection@thestayclub.com](mailto:dataprotection@thestayclub.com). If you wish to find out more about the rights available to you or to make a complaint, please contact the Information Commissioner's Officer (ICO), the UK regulator [here](#).

Under certain circumstances, by law you have the following rights

#### **a. 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.

b. Your right of access

You have the right to access the personal data we hold about you and certain other information (such as that provided in this Privacy Notice). This is so you can check that we are using your information in accordance with data protection laws.

c. Your right to correct and erase your personal data

You have the right to ask us (and third parties to whom we may transfer your personal data) to rectify your personal data if it becomes inaccurate or incomplete. You have the right to ask us to erase your personal data if:

- Consent was originally required, and you subsequently withdraw your consent to our processing of your personal data;
- Your personal data has been processed unlawfully by us; or
- Your personal data is no longer necessary for the purposes for which we collected it or there is no compelling reason for us to continue processing it.

You may also have the right to have incomplete personal data completed, including by means of providing a supplementary notice. Whether or not this is appropriate in any case depends on the purposes for which your information is being processed.

We may notify any third parties with whom we have shared your information that you have made a rectification request. We will take reasonable steps to do this, but this may not always be possible or may involve disproportionate effort.

d. 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

# THE STAY CLUB

## LONDON STUDENT ACCOMMODATION

- your personal data has been processed unlawfully by us but you do not want to request erasure
- we no longer need your personal data for our original purpose but it is required to establish, exercise or defend legal rights
- you have requested erasure of your personal data and verification of our grounds for continued processing is pending

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.

e. 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.

f. Your right to object to processing

You have the right to object, on grounds relating to your situation at any time, to processing of personal data concerning you that is based on us exercising our legitimate interests.

If we can show compelling legitimate grounds for processing your personal data which 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 also can object at any time to use of your personal data for direct marketing purposes.

g. Your right to lodge a complaint

You have the right to lodge a complaint about the way we handle or process your personal data with the UK regulator, the ICO, [here](#).

# THE STAY CLUB

## LONDON STUDENT ACCOMMODATION

### h. Your right to withdraw consent

If you have given your consent to allow us to process your personal data, you have the right to withdraw your consent at any time (although your withdrawal of consent does not mean the processing of your data up to that point was unlawful).

Your rights, as summarised above, are subject to various exceptions. We usually act on requests to provide information within 20 working days from receiving your request. However, if the request is going to take longer to deal with we will advise you of this.

## 21. Cookies

We use cookies on our website. For further information see our [cookies policy](#).

## 22. Changes To This Notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information. This privacy policy has been in effect since 25th May 2018.