

PLATFORM_ in Edinburgh Resident Privacy Notice

Purpose of this Privacy Notice

Platform Edinburgh AM Limited and urbanbubble Limited ('urbanbubble') manage PLATFORM_ in Edinburgh on behalf of Edinburgh Adobe Residential Limited (Adobe), the owner of the building. urbanbubble are the Controllers of the Personal Data of residents at PLATFORM_ in Edinburgh and Platform Edinburgh AM Limited are processors.

This Privacy Notice sets out how we meet our obligations under relevant data protection regulation and law when collecting and processing the Personal Data of residents at PLATFORM_ in Edinburgh. This notice provides you with the necessary information regarding your rights and obligations and explains how, why, and when we collect and process your Personal Data.

Who We Are

Platform Edinburgh AM Limited registered office is at **Marble Arch House, 66 Seymour Street, London, W1H 5BT** and we are registered in England and Wales under company number 13897306. We are registered on the Information Commissioner's Office Register of Data Controllers under registration number ZB402822.

urbanbubble Limited registered office is at **Sevendale House, 7 Dale Street, Manchester M1 1JA** and we are registered in England and Wales under company number 06516374. We are registered on the Information Commissioner's Office Register of Data Controllers under registration number Z2988422.

Edinburgh Adobe Residential Limited registered office is at **1 Fleet Street, London, ED7M 7WS** and is registered in England and Wales under company number 15658543.

Any Resident queries in respect of this Privacy Notice should be addressed to: datacontroller@urbanbubble.co.uk

Information That We Collect

The Personal Data that we collect from you is:

- Name
- Date of Birth
- Marital Status
- Home Address
- Personal Email
- Business Email
- Source of Income and Financial Status
- Guarantor Information

- Visa or Work Permit
- Tenancy Termination Reports and Deposit Information
- Bank Account and Direct Debit Details
- Nationality and Immigration Status
- Home Telephone Number
- Work Telephone Number
- Mobile Telephone Number
- Emergency Contacts
- National Insurance Number
- Passport Number
- Driver's License Number
- CCTV Images
- Credit Score
- Utilities Consumption and Supplier Information
- Vehicle Registration Number

We collect information in the below ways:

- Online forms including surveys and referencing applications
- Directly from you as our customer
- Call recordings

How We Use Your Personal Data

We process your Personal Data to meet our legal, statutory and contractual obligations. In some cases, we may use your Personal Data for our legitimate interests in providing you with our products and services, provided this does not harm your interests and fundamental rights. We will never collect any unnecessary Personal Data from you and do not process your Personal Data in any way, other than already specified in this notice.

The purposes and reasons for processing your Personal Data are detailed below: –

- We collect and store your Personal Data in order to communicate with you about matters relating to the management of your property; that is, to keep you informed of important matters affecting your home and building and to carry out statutory duties in accordance with your assured short-hold tenancy agreement.
- We collect and store your Personal Data as part of our legal obligation for business accounting and tax purposes.

- In order to assess your suitability to enter into a tenancy agreement, we share your Personal Data with Let Alliance which is a credit reference agency who provide us with financial background checks and deposit alternative solutions for applicants.
- We will also share your details with 3rd parties such as utility companies, local councils and managers of on-site car parking. Further detail is included under 'Sharing and Disclosing Your Personal Data' below.
- In the event of management transfers and or asset sale, we have contractual duties to share your Personal Data with other managing agents which are instructed to act on behalf of the owner of the building.
- We may use anonymised, aggregated reporting and statistics of prospects and residents for the purpose of analytics, internal reporting or reporting to our group or other third parties, and for our marketing purposes.
- We retain your data for up to 7 years from the data that you leave our building, and your deposit accounting process is complete.
- It may be necessary to provide your Personal Data to contractors in the carrying out of maintenance at your building especially when access may be needed to your apartment. In this instance, further permission will be sought from you before any data is provided.
- We will share your details with 3rd party CRM systems in order to manage your tenancy with us.
- In the event of arrears, we may share your personal details with 3rd party collection agencies, solicitors and the relevant civil courts.
- We may use your data to survey you on our services and the contractors we use.
- We will provide our on-site staff with your Personal Data in order to provide the on-site service.
- Our calls are recorded for training and monitoring purposes; they are retained for a period of 6 months then deleted.
- If your building has on-site CCTV, we will keep the recording for a period of 28 days before being recorded over. Footage can be downloaded and kept in certain circumstances.

We take your privacy very seriously and will never disclose, share or sell your Personal Data without your consent, unless required to do so by law. We only retain your Personal Data for as long as is necessary and for the purposes specified in this notice. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time.

Your Rights

You have the right to access any Personal Data that we hold and process about you and to request information about:

- What Personal Data we hold about you
- The purposes of the processing
- The categories of Personal Data concerned
- The recipients to whom the Personal Data has/will be disclosed
- How long we intend to store your Personal Data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct or complete the data and we will update and correct it as quickly as possible, unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your Personal Data or to restrict processing in accordance with data protection laws, as well as to unsubscribe from any direct marketing from us.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the relevant request; this is to ensure that your Personal Data is protected and kept secure.

If you wish to exercise any of these rights, your request should be addressed to datacontroller@urbanbubble.co.uk.

Sharing and Disclosing Your Personal Data

We do not share or disclosure any of your Personal Data without your consent, other than for the purposes specified in this notice or where there is a legal requirement. We use third parties to provide the below services and business functions, however all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, relevant data protection laws and regulations and any other appropriate confidentiality and security measures.

Let Alliance

We use Let Alliance to process your application and references in line with your apartment application including, employment, past/current landlord references and credit checks.

For more information on the Let Alliance privacy policy please refer to <https://www.letalliance.co.uk/privacy-policy/>

Inventory Hive

We use Inventory Hive to carry out an independent inventory check-in report and an independent move out report at the end of your tenancy.

For more information on Inventory Hive's privacy policy please refer to <https://www.inventoryhive.co.uk/privacy-policy>

Tenancy Deposit Scheme (TDS)

We use TDS to register your security bond when you become a tenant and share data on your name, address and the amount of your bond.

For more information on the TDS privacy policy please refer to www.tenancydepositscheme.com

Safeguarding Measures

We take your privacy seriously and we take every reasonable measure and precaution to protect and secure your Personal Data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, including encryption of Personal Data, secure logins, restricted transfer of data between devices and controlled permissions to operating systems and management software.

Consequences of Not Providing Your Data

You are not obligated to provide your Personal Data to us, however, as this information is required to enable you to rent an apartment and for us to provide you with our services, we will not be able to offer some or all of our products or services without it.

How Long We Keep Your Data

We only ever retain Personal Data for as long as is necessary and we have strict review and retention policies in place to meet these obligations. In order to fulfil our tax compliance obligations we are required to keep Personal Data and associated records of financial transactions for a period of up to 7 years after which time it will be destroyed.

Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise or withdraw your consent.

Promotions & Offers

Occasionally, PLATFORM_ in Edinburgh would like to contact you with details of the offers and services that we provide. If you consent to us using your contact details for these purposes, you have the right to modify or withdraw your consent at any time by using the opt-out/unsubscribe options or by contacting us directly at datacontroller@urbanbubble.co.uk.

Lodging A Complaint

We only process your Personal Data in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however, you wish to raise a complaint regarding the processing of your Personal Data or are unsatisfied with how we have handled your Personal Data, you can contact PLATFORM_ in Edinburgh via the means given below. You also have the

right to lodge a complaint with the supervisory authority – the Information Commissioner’s Office.

urbanbubble

Data Protection Officer, urbanbubble
Sevendale House, 7 Dale Street, Manchester, M1 1JA
Email: datacontroller@urbanbubble.co.uk
Tel: 0161 236 3344

Information Commissioner’s Office (ICO)

Web: <https://ico.org.uk/global/contact-us/>
Email: casework@ico.org.uk
Tel: 0303 123 1113