

Data & Privacy Policy



Data Protection & Privacy

At Atha Students we are committed to protecting and respecting your privacy.

This policy:

- Explains when and why we collect personal information about you and other people who visit our website; how we use it; the circumstances when we may disclose it to others; and how we keep it secure.
- Only applies to the collection of your personal data by Atha Student and the use of that information by Atha Student and those whom we share it with.
- Does not cover third party websites to which we may provide links, nor does it cover advertisers. They may have their own privacy policies and/or terms and conditions of use which you should review and understand separately.

Please read the policy carefully to understand our views and practices regarding your personal data and how we will treat it. When we use the word you or your in this policy, it means you as a user of the www.athastudents.com website, or as a person whose details we collect as part of our accommodation booking services (whether as a tenant or as a guarantor of a tenant's obligations under their assured shorthold tenancy agreement with us or an emergency contact of a tenant).

1. What personal data do we collect about you and how is it collected?

We may collect personal data from you in several ways.

- When you register for the various services provided on our website;
- If you update your details;
- When you contact us with an enquiry, a complaint, or you provide other feedback to us;
- When you request to be sent marketing communications such as information about special offers, competitions, events, products and services;
- When you disclose your personal data to us (through our website or otherwise) at any other point; and
- If and/or when you agree to act as a guarantor or emergency contact
- The personal data we collect may include:
 - Name (including title);
 - Postal address;
 - Email address;
 - Telephone number;
 - Mobile number;
 - Date of birth;
 - Nationality;
 - Gender;
 - University name;

- University course name;
 - Room preferences;
 - Your IP address;
 - The date and time you used our services;
 - The pages you visited on our website and how long you visited for;
 - The internet browser and devices you are using; and
 - Material submitted by you to us including answers to questions on surveys or registration forms
- We may collect special category data about you, in the form of information about any disabilities and medical conditions you may have that we need to know so that we can ensure the accommodation you are provided with is best suited to your needs, and to ensure your safety and wellbeing during your stay. We will only collect special category data from you, and process this data, where you have given your explicit consent.

2. From where do we collect personal data?

We may collect personal data about you from the following sources:

- Directly from you, this is information you provide to us when using our services and website. Our website uses cookies, please refer to the section below headed 'Cookies' for more information on this;
- From an Education Institution, College, University or similar organisation that provide us with your personal details in order for you to accept your accommodation offer and finalise your booking with us, or who has made a booking on your behalf;
- Through a person using our booking services who provides us with your details, if you are a guarantor or emergency contact we may receive your personal data from the person using our booking services

When you are nominating someone as a guarantor or emergency contact, always think carefully before disclosing their personal data and ensure that you have their consent to do so.

3. How and why do we use your personal data?

We will only process your personal data as necessary for the purpose for which it has been collected or for purposes which are compatible with the original purpose. There are various ways in which we may use or process your personal data. Most commonly, we will use your personal data in the following circumstances:

Performance of a contract

If you have signed a contract with us for the provision of our accommodation services, or have entered negotiations to do so, we will process your personal data as necessary for the performance of that contract, or to take steps at your request prior to entering into that contract. This will include your name, postal address, email address, telephone number and mobile number. If you are a

tenant, you should note that during the process of booking a room within one of our residences, we only request information that is necessary to enable us to allocate your room in accordance with your needs and to enable us to contact you or the persons you nominate as your guarantor and emergency contact. If you are a guarantor, we only request information that is necessary to enable us to obtain a guarantee from you such as your name, postal address, proof of your address, an email address and telephone number. If you do not enter into the guarantee by the commencement of the term of the relevant tenancy then your personal data will be deleted.

Legitimate interests

We may use and process your personal data to carry out activities which, as a business, we have a legitimate interest in doing. This includes:

- To respond to any correspondence that you send to us and to fulfil your requests (e.g. residence viewing, requests for a call back or requests for information about a specific residence). In this respect, we may contact you via telephone, mail, email or other electronic means;
- To send you marketing material from time to time after you have purchased a product or service from us. We will only contact you with information about our own products and services. You have the right to object to us sending you this information at any time.
- To monitor, develop and improve the website, our services and your overall accommodation experience;
- To process and respond to any complaints made by or about you. We may contact you via telephone, mail, email or other electronic means; Whenever we seek to rely on legitimate interests to process your personal data we will conduct an assessment taking into account:
 - whether the processing is necessary for us to achieve a lawful and genuine interest;
 - the volume and nature of personal data involved;
 - whether the processing would be within your reasonable expectations;
 - any risk to your fundamental rights and interests which the processing may present; and
 - the safeguards that we have in place to minimise any risk to you.

Consent

We will process your personal data for any other purposes to which you have provided your consent. For example, where you have provided consent, we may use and process your information to contact you from time to time by email, text message or telephone about special offers, events, products, services or information which we think may be of interest to you.

Legal obligations

We may use and process your personal data as necessary to comply with any legal or regulatory obligation to which we are subject.

4. Who do we share your personal data with?

Third Party Service Providers working on our behalf

We may disclose your information to third party companies or organisations in the UK or European Economic Area who assist us with the provision of our services. For example:

- Security firms who provide security services to ensure your safety at our residences;
- Repairs and maintenance contractors who assist us with the maintenance of our residences as they may need to gain access to your room if maintenance is required during your stay;
- Providers of information technology systems and software-as-a service products that enable us to manage and administer our business operations;
- A market research firm for the purposes of participating in the annual National Student Housing Survey or any other NPS scheme;
- Payment processors who specialise in secure online capture and processing of credit/debit card transactions to ensure that when you use the online booking service on our website, your card information is collected and held securely; and
- Professional advisors including our lawyers, bankers, auditors and insurers.

Whenever we use third party service providers, we disclose only the personal information that is necessary for them to deliver the required services and have contracts in place that limit their ability to use your information for purposes other than providing the services and which ensure that they are subject to appropriate security and confidentiality obligations.

Education Institutions

We may disclose your information to the Education Institution, College or University that you are attending in connection with your stay in our accommodation.

Other parties when required by law or as necessary for safeguarding

There may be instances when we disclose your information to other parties:

- To comply with the law and our regulatory obligations or to respond to legal proceedings;
- To verify or enforce compliance with terms of use and policies governing our services; and
- To protect the rights, property or safety of Atha Students, or any of our respective partners, employees or customers.

Other parties in connection with Corporate Transactions

We may transfer your personal information to a third party as part of a sale of some or all of our business and assets as part of any business restructuring or reorganisation. In all instances, we will take steps to ensure that any third party that handles your information complies with data protection laws and protects your information just as we do.

5. Student Welfare

If the landlord or managing agents have serious concerns about the health and well-being of the tenant, the tenant gives the landlord permission to contact the University College or named next of kin or other person the tenant has nominated for that purpose. We may also contact other parties when required by law, or as necessary for safeguarding purposes.

6. Do we use your personal data for automated decision making?

We may make automated decisions that affect you by using the answers you give to some questions during the booking process to determine your compatibility with other residents. This will involve analysing preferences that you express when you complete the online booking form in order to match you up with people who have expressed similar preferences. This improves the likelihood of harmony amongst those sharing flats. See also the section entitled 'Your Rights'.

7. Do we transfer your personal data outside the European Economic Area (EEA)?

We do not process your personal data outside of the EEA. If you are located outside of the EEA when you contact or contract with us, we will respond to you, which may involve the transmission of your data to or via countries outside of the EEA.

8. How do we protect your personal data?

The personal data submitted by you and collected by us via the website is encrypted over TLS 1.1 or higher. Personal data is stored in a secure system, only accessible by our employees or data processors with the privileges appropriate to their role.

9. Do we use cookies on our website?

To provide enhanced functionality on our website we use cookies which may collect your personal data.

10. What happens if you do not provide us with the information we request or ask that we stop processing your information?

If you do not provide the personal data necessary or ask that we stop processing your personal data, we may not be able to provide you with access to some or all of our services. Where we rely on your consent to hold certain special category data (such as health information) or marketing preferences, you will still be able to use all our services even if you choose not to give consent to processing this information.

11. How long will we keep your personal data?

Except as otherwise permitted or required by applicable law or regulation, we only retain your personal data for as long as is necessary to fulfil the purposes that we collected it for, as required to satisfy any legal, accounting, or reporting obligations, or as necessary to resolve disputes. To determine the appropriate retention period for your personal data we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure, the purposes for processing the personal data, whether we can fulfil the purposes of processing by other means and any applicable legal requirements. If you are a tenant, or a guarantor for a tenant, we will retain your personal data for the duration of the tenancy agreement and for a period of time after the end of the tenancy agreement taking into account the limitation periods set out in the Limitation Act 1980. If we have obtained your personal data following a request by you for information about our accommodation but you do not subsequently become a tenant (or guarantor) we will hold your personal data for 18 months from the date that you provided it to us.

12. What are your rights?

You have various rights relating to your personal data, which we have summarised below. To exercise these rights please contact hello@athastudents.com. If you wish to find out more about the rights available to you please contact your data protection regulator.

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 policy.

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 Policy). This is so you can check that we are using your information in accordance with data protection laws.

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 statement. 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.

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;
- we no longer need your personal data for our original purpose but it is required to establish, exercise or defend legal rights; or
- 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.

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 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.

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 your national data protection regulator.

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 one month from receiving your request. However, if the request is going to take longer to deal with we will advise you of this.

13. Changes to this policy

We may update this policy from time to time and will post any changes on our website at www.athastudents.com. You should check back occasionally and read through it again.

14. Contacting

Queries relating to this policy: If you have any questions about this policy or if you wish to access your personal data or make a complaint about how we have handled your information, please feel free to contact us at: hello@athastudent.com to update your personal data: If you wish to make any changes to your personal data, for example because your contact details have changed, you can do this by emailing our onsite management team directly using the contact details set out on the residence web page and student handbook.

15. Tracking

We may use third-party cookies and tracking technologies, including Meta, TikTok, Snapchat, and Google, to measure the effectiveness of our advertising and understand how users interact with our website after engaging with our social media content. These technologies may track your visit and actions on our site and share this information with the relevant platforms. We only use these cookies with your consent.