



## **Tenant, Applicant and Guarantor Privacy Notice**

This notice explains what information we collect, why we collect it and how we use it.

During the course of our activities, we will process personal data (which may be held on paper, electronically, or otherwise) about prospective tenants, applicants, current tenants, former tenants and relevant guarantors, and we recognise the need to treat it in an appropriate and lawful manner. This notice applies whether you are viewing it on our website or have been issued it as part of a tenancy application or agreement, and is intended to make you aware of how we will handle your information throughout our relationship with you.

ST Properties is committed to protecting and processing your personal data in accordance with the UK General Data Protection Regulation and the Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025 (together, the legislation).

For the purpose of the legislation, ST Properties is the Data Controller. The person responsible for data protection is Susie Copeland, who can be contacted at ST Properties, 63 James Street, Stoke-on-Trent, ST4 5HR or [info@st-properties.co.uk](mailto:info@st-properties.co.uk).

This privacy notice will be regularly reviewed and updated.

### **Information we collect**

We collect and hold personal data for the purpose of assessing tenancy applications, managing properties, and administering tenancy agreements. Depending on your stage of application or tenancy, information may include (but is not limited to):

- Full name, date of birth and contact details
- Previous address history
- Employment and/or benefit information
- Financial status and income verification
- Right to rent documentation
- Identification documents such as passport or driving licence
- Credit and referencing information
- Guarantor details (where required)
- Maintenance requests, correspondence and tenancy-related communications

Where a guarantor is required, we will collect guarantor information to assess suitability and enable legal responsibility for unpaid rent or damages, and such data is processed in the same way as tenant data.

### **Lawful basis of processing**

We process applicant, tenant and guarantor information under the following lawful bases as defined within UK GDPR:

- Article 6(1)(b) – processing necessary for the performance or entry into a tenancy contract, or a guarantee agreement connected with it
- Article 6(1)(c) – compliance with legal obligations (e.g. right-to-rent checks, local licensing compliance)

- Article 6(1)(f) – our legitimate interests in assessing suitability, preventing fraud, and managing tenancies

We do not rely on consent to process information for tenancy assessment, referencing or legal compliance. Consent is only requested where optional communications such as receiving property updates or future marketing information are offered.

## **Sharing of information**

Your information may be shared when necessary for tenancy processing, legal compliance or property management. This includes sharing with:

- Referencing and credit-check agencies
- Local authorities and council tax departments
- Deposit scheme providers
- Utility companies
- Maintenance contractors
- Property landlords (where we act as agent)
- Legal advisers or debt-recovery providers

All organisations we share data with are required to comply with data protection law and to handle your information securely and lawfully. We do not sell personal information under any circumstances, and will not otherwise share, sell or distribute it without your consent unless required to do so by law.

## **Where and how is the data stored?**

Tenant, applicant and guarantor data is stored securely with appropriate safeguards in place to prevent unauthorised access, loss, or misuse.

Paper-based documents received during the application or tenancy process are scanned and securely uploaded to our electronic systems. Once digitised, physical documents are shredded using a cross-cut shredder to ensure complete destruction.

Electronic data is stored on secure cloud-based platforms that use encryption, secure login protocols, and multi-factor authentication to ensure data confidentiality and integrity. Access to cloud systems is restricted to authorised personnel only. In-house software systems used to manage tenancies are also protected by secure networks, firewalls, password protection, and regular software updates to guard against cyber threats.

Our data security practices are regularly reviewed to ensure continued compliance with UK GDPR and industry best practice.

Personal data is stored within the UK or by providers operating under UK GDPR compliance rules, even where servers are outside the UK. Where data is transferred outside the UK, we ensure this is done using an approved transfer mechanism such as an adequacy decision or appropriate safeguards.

## **Retention periods**

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected, including satisfying legal, accounting, or reporting requirements. Typical retention periods include:

- Successful applicants, tenants and their guarantors – up to 7 years after the tenancy ends (the legal limitation period for contract claims)
- Unsuccessful applicants – typically up to 12 months

- Right-to-rent documentation – minimum 12 months after tenancy end
- Records relating to disputes – retained while the matter remains outstanding

Where consent has been the lawful basis (e.g. for marketing), data will be retained until consent is withdrawn.

## **Your rights**

You have a right of access to check your personal data to verify the lawful basis of processing. We are obliged to respond to an access request within one month of receipt of a valid request, save where we need to pause this period to verify your identity or clarify the scope of your request. We may not charge a fee unless the request is unfounded, excessive or repetitive; if a fee is charged, it will be a reasonable fee based on the administrative cost of providing the information.

You have a right to rectification if the data we hold is either inaccurate or incomplete. If your data has been disclosed to third parties, we will inform them of the rectification, where possible.

You have a right to require erasure of your data in certain circumstances (the right to be forgotten), for example where the data is no longer necessary for the purpose it was collected, where you withdraw consent and there is no other lawful basis for processing, or where you object to processing and we have no overriding legitimate grounds to continue. We will comply with your request unless we have another basis of processing justifying our retaining the data (for example a legal requirement or the defence of a legal claim).

You have a right to ask us to restrict processing, i.e. to block or suppress processing where, for example, the data may be incorrect and while its accuracy is being verified. We remain permitted to store the data during this time.

You have a right to object to further processing of your personal data. We may be required to stop processing unless there is some other legitimate basis, such as a legitimate interest or a requirement for the exercise or defence of a legal claim.

Where processing is based on consent or a contract and is carried out by automated means, you have a right to data portability. This means you can ask us to provide your personal data in a structured, commonly used, machine-readable format, or ask us to transmit it directly to another organisation where this is technically feasible.

If you wish to exercise any of these rights, please contact Susie Copeland at the above address or via email.

## **Withdrawal of consent**

Where the lawful basis for processing is your consent – for example, for optional communications such as property updates or marketing – you may withdraw consent at any time by writing to Susie Copeland, ST Properties, 63 James Street, Stoke-on-Trent, ST4 5HR or emailing [info@st-properties.co.uk](mailto:info@st-properties.co.uk). Withdrawal does not affect the lawfulness of processing carried out before withdrawal, or processing that continues on another lawful basis such as contract or legal requirement.

## **How to complain to us**

If you are unhappy with how we have handled your personal data, please contact us in the first instance by writing to Susie Copeland, ST Properties, 63 James Street, Stoke-on-Trent, ST4 5HR, or by emailing [info@st-properties.co.uk](mailto:info@st-properties.co.uk), setting out the nature of your concern. We will acknowledge your complaint within 30 days and aim to investigate and respond without undue delay. Making a complaint to us does not affect your right to complain to the Information Commissioner's Office at any time.

## **How to complain to the supervisory authority**

The supervisory authority responsible for data protection is the Information Commissioner's Office (ICO), to whom concerns may be reported by phone, email, live chat, or post:

- Website: [ico.org.uk](https://ico.org.uk)
- Telephone: 0303 123 1113 (or +44 1625 545 745 if calling from outside the UK)
- Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

*Updated August 2026*