

# Tenant Privacy Notice: Further Information

This document should be read in conjunction with the Tenant Privacy Notice, and the Inn's other Data Protection policies and notices which can be viewed on the Inn's website: <https://www.middletemple.org.uk/about-us/data-protection>.

This document provides additional, detailed information about the personal data that the Inn uses in relation to administering and managing tenancies.

If you would like more information please contact the Inn's Data Protection Officer at [data.protection@middletemple.org.uk](mailto:data.protection@middletemple.org.uk)

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## **Schedule 1: Categories of personal data**

The following list details the categories of personal data that the Inn may collect and hold on tenants and residents, including prospective and former tenants and residents, and where applicable, guarantors or referees.

### Personal and background information

- Your name and title
- Photograph
- Date of birth
- Contact details, including address, email address and phone number
- Identity documents
- Employment details

### Tenancy, financial and deposit information

- Financial and transaction data, including bank account details and information about payments from you, including any arrears
- Deposit information
- Contract length
- Address of property
- Car registration number
- Maintenance requests, including correspondence about repairs and complaints
- Log in information for the Inn's website, where relevant
- Details about council tax, water charges and utilities

### Inn membership information (where applicable)

- Inn membership number
- Feedback and survey responses
- Marketing and communications data, including your preferences in receiving marketing from the Inn and third parties

See the Member Privacy Notice for full details on the membership information held by the Inn.

### Information about your family, lifestyle or social circumstances

In certain circumstances we will also hold limited information about your spouse, partner, or civil partner, or other individuals. This is collected, for example, where you name them as an emergency contact.

### Your image

When this has been captured on the Inn's CCTV cameras.

### Basic information about your activities in the Inn

Including use of information and communication systems, such as access times from signing in and out of buildings and swipe card access, or an IP address if you access information from a device, or usage records for systems. The Inn keeps a record of individuals signing in and out of the Inn for health and safety purposes, in case they are needed in the event of an evacuation.

### Special category and criminal offences data

The Inn may also process some kinds of more sensitive information about you that is classed as 'special category' data, and which receives additional protections under law, and in terms of our processing of it.

This includes data about:

- Criminal convictions and offences;
- Information about your physical or mental health, or disability status, to ensure your and other individual's health and safety and to make any reasonable adjustments needed;
- If you share it voluntarily, information about your race or ethnicity, nationality, gender and disability.

## Schedule 2: Summary Tenant data retention schedule

The following table provides a summary of the records containing Tenant's personal data in the Inn's records retention and disposal schedules. The full schedules are available upon request from the Data Protection Officer.

Class Code	Record	Retention Period
<b>MB1</b>		
<b>1.1, 1.4, 1.5</b>	Name, title, date of birth, member status, membership number	If a member of the Inn, keep permanently. Transfer to Inn's archive at end of membership.
<b>1.2</b>	Contact details, including permanent address, email, telephone, greeting, and a term time address if different to main contact details.	Keep until superseded, then destroy out of date information. Keep most up to date information for 1 year after end of membership, then destroy.
<b>1.6, 1.8, 1.9</b>	Photograph, proof of identity, employment details, references.	Keep for 1 year after end of membership, then destroy.
	Emergency contact information	Keep until superseded, then destroy out of date information. Keep most up to date information for 1 year after end of tenancy, then destroy.
	Car registration information	Keep until superseded, then destroy out of date information.
Class Code	Record	Retention Period
<b>ES3</b>	<b>Sub-function: Property management – leasing out</b>	
<b>3.1</b>	Signed contracts.	Keep for 15 years after termination of lease, then the Inn's Archive will make a summary list of leases.
<b>3.2</b>	Subletting agreements.	Keep permanently. Transfer to Inn's archive 1 year after completion.
<b>3.3</b>	Memoranda of terms.	Keep permanently. Transfer to Inn's archive 1 year after termination of lease.
<b>3.5</b>	Licenses.	Keep permanently. Transfer to Inn's archive 1 year after termination of lease.
Class Code	Record	Retention Period
<b>ES6</b>	<b>Sub-function: Property maintenance - general</b>	
<b>6.7</b>	Correspondence with tenants relating to maintenance.	Keep for 6 years after date of correspondence then transfer to Inn's Archive for appraisal.
Class Code	Record	Retention Period
<b>ES9.2</b>	<b>Sub-function: Security</b>	
<b>9.2</b>	CCTV and surveillance records, including original recordings and notes.	Keep for 1 month from date of recording, then destroy.

Class Code	Record	Retention Period
<b>FN3</b>	<b>Sub-function: Financial accounting</b>	
<b>3.1</b>	Financial and transaction data, including bank account details and information about payments	Keep for 6 years after the end of the financial year, then destroy.
<b>3.10</b>	Managing debts	Keep for 6 years after clearance or write-off of debt, then destroy.

## Schedule 3: Purposes of processing personal data

For some processing activities, we consider that more than one lawful basis may be relevant - depending on the circumstances.

Purposes of processing	Lawful basis				
	We are permitted to process your personal data because				
	1. You have given your consent to the processing	2. It is necessary for the performance of a contract with you	3. It is necessary for us to comply with a legal obligation	4. It is necessary for our legitimate interests or those of third parties	5. It is necessary to protect your vital interests (or those of someone else)
<b>a) Producing and entering into tenancy agreements/leases</b>					
1. Administering your application for a tenancy/lease		✓		✓	
2. Obtaining, considering and verifying your references				✓	
3. Reviewing and confirming your identity			✓		
4. Performing credit checks				✓	
5. Preventing fraud			✓	✓	
6. Processing any deposit associated with your contract		✓		✓	
<b>b) Management of your tenancy</b>					
7. Communicating with you about, and managing maintenance request relating to your property		✓		✓	
8. Communicating with you and providing you with information in connection with your tenancy		✓		✓	
9. Processing rent payments or other payments associated with your tenancy		✓		✓	
<b>c) Management of your relationship with the Inn</b>					
10. Notifying you about changes to our terms or privacy policy		✓	✓	✓	
11. Communicating with you to provide information on new properties available				✓	
12. Asking you to complete surveys				✓	
13. Managing the relationship with the Temple Residents Association (TRA)				✓	

14. Managing our health and safety compliance obligations			✓		
15. Contacting the appropriate person in the event of an emergency concerning you					✓
16. Administering our insurance policies				✓	
17. Determining whether any adjustments are necessary to enable you to access your property		✓	✓		
18. Preparing risk assessments to prevent injuries at the Inn			✓		
19. Handling complaints, including investigating issues, considering appropriate resolution and mitigating actions and reviewing outcomes				✓	
<b>d) Security and governance</b>					
20. Monitoring the security of the Inn's physical premises (including car parks) and systems, networks and applications			✓	✓	
21. Identifying and authenticating visitors to the Inn				✓	
22. Ensuring compliance with the Inn's policies and procedures				✓	
<b>e) Day-to-day business operations</b>					
23. Implementing, adapting and enhancing systems and processes to develop or improve our business and/or make your tenancy easier or more enjoyable				✓	
24. Managing, planning and delivering our business, sales and marketing strategies				✓	
25. Publishing external facing materials for marketing and public relations purposes such as where we mention you in the context of the Inn's projects and initiatives in marketing materials, social media posts or press releases	✓			✓	
26. Monitoring attendance on site for fire evacuation or COVID-19 test & trace purposes			✓	✓	✓

## Schedule 4: Purposes of processing special category personal data

Purposes of processing	Special category lawful basis			
	We are permitted to process your personal data because			
	1. You have given <b>your explicit consent</b> to the processing	2. It is necessary to protect the <b>vital interests</b> of the data subject or another person or they are physically or legally incapable of giving consent	3. It is necessary for our establishment, exercise or defence of <b>legal claims</b>	4. It is necessary for reasons of <b>substantial public interest</b>
<b>a) Producing and entering into tenancy agreements/leases</b>				
1. Conducting verification and vetting, including credit checks where required	✓			
<b>b) Management of your tenancy</b>				
2. Contacting the appropriate person in the event of an emergency concerning you		✓		
3. Administering our insurance policies				✓
4. Determining whether any adjustments are necessary to enable you to access your property or communal areas	✓			✓
<b>c) Security and governance</b>				
5. Identifying and authenticating visitors to the Inn	✓			✓
<b>d) Legal and regulatory compliance and responsibilities</b>				
6. Equal opportunities reporting				✓
7. Investigating, evaluating, demonstrating, monitoring, improving and reporting on the Inn's compliance with relevant legal and regulatory requirements			✓	
<b>e) Day-to-day business operations</b>				
8. Supporting our diversity programmes and member support networks and initiatives	✓			✓
9. COVID-19 contact tracing in the case of a positive test		✓		✓