

1. Introduction

Broadgate Residential Investments Ltd, trading as Cloud Student Homes (“Cloud Student Homes”, “the Agent”, “we”, “us” or “our”), lets and manages residential and student accommodation and provides facilities and block management services across the United Kingdom. We take the privacy and security of personal information seriously.

This Privacy Policy explains how we collect, use, store, share and protect personal data belonging to tenants, residents, occupiers, guarantors, landlord clients, leaseholders (individual and institutional), freeholders, prospective customers, contractors, suppliers, visitors to our properties and users of our website and app (the “MyCloudStudent” app). It also explains the rights you have in relation to your personal data.

This Policy has been prepared in accordance with the UK General Data Protection Regulation (“UK GDPR”), the Data Protection Act 2018 (as amended), and the Data (Use and Access) Act 2025, together with guidance issued by the Information Commissioner's Office (“ICO”).

Please read this Policy carefully. If you have any questions, or do not agree with any part of it, please contact us using the details in Section 22 (Contact Us) before providing your personal data to us.

2. Who We Are and How to Contact Us

Broadgate Residential Investments Ltd (trading as Cloud Student Homes) is the data controller responsible for your personal data for the purposes of the UK GDPR and the Data Protection Act 2018. This means we decide how and why your personal data is processed.

| Field                       | Detail                                                          |
|-----------------------------|-----------------------------------------------------------------|
| Trading name                | Cloud Student Homes                                             |
| Registered company          | Broadgate Residential Investments Ltd                           |
| Registered / postal address | Old Fire Station, Salt Lane, Salisbury, SP1 1DU, United Kingdom |
| Telephone                   | +44 (0)330 053 5701                                             |
| Email                       | info@cloudstuenthomes.co.uk                                     |
| Data protection contact     | dpo@cloudstuenthomes.co.uk                                      |
| ICO registration reference  | ZB300829                                                        |

We may act as a data controller in our own right (for example, when managing our own tenancy relationships) and, in some circumstances, as a joint controller or processor on behalf of landlord clients (for example, when managing a property under a management agreement). Where we process data solely on the instructions of a landlord client, the landlord remains the controller and their own privacy notice will also apply; you should contact them directly with any queries about that processing where indicated.

3. Scope of This Policy

This Policy applies to personal data we collect and process in connection with:

- Letting and managing residential and student accommodation, including purpose-built student accommodation (PBSA);
- Facilities management services, including maintenance, repairs, health and safety compliance, and block/estate management;
- Enquiries, bookings, viewings and applications made via our website, app, telephone or in person;
- Landlord client relationships and property management instructions;
- Freeholder and block/estate management relationships, including building ownership records, service charges and building compliance;
- Use of our website (www.cloudstuenthomes.co.uk), the MyCloudStudent app, and associated online portals; and
- Visits to, and use of, our managed properties, including CCTV and access control systems.

Leaseholders — both individual owner-occupiers or landlords who hold a long lease, and institutional (corporate) leaseholders — are addressed specifically at Section 5.4.

This Policy does not cover the processing of personal data relating to our employees or job applicants, which is addressed in a separate internal HR privacy notice available on request.

4. The Data Protection Principles We Follow

We are committed to processing personal data in accordance with our responsibilities under the UK GDPR. Article 5 requires that personal data must be:

- Processed lawfully, fairly and in a transparent manner (Lawfulness, fairness and transparency);
- Collected only for specified, explicit and legitimate purposes (Purpose limitation);
- Adequate, relevant and limited to what is necessary (Data minimisation);
- Accurate and, where necessary, kept up to date (Accuracy);
- Kept for no longer than is necessary (Storage limitation);
- Processed in a manner that ensures appropriate security (Integrity and confidentiality); and
- Processed in a way that we can demonstrate compliance with these principles (Accountability).

## **5. Personal Data We Collect**

The personal data we collect depends on your relationship with us. Categories of personal data we may collect include the following.

### **5.1 Tenants, Residents and Occupiers**

- Identity data: full name, title, date of birth, gender/self-described identity, photograph, national insurance number, nationality, marital status;
- Contact data: postal address, email address, telephone number;
- Right to rent and immigration data: passport/visa details, right to rent status and supporting identification documents (England only, where applicable);
- Financial data: bank account details, payment history, guarantor and referencing information, credit check results, income and employment details;
- Tenancy data: tenancy agreements, renewals, joint tenants, co-residents, deposit details, arrears, breaches of tenancy, complaints, notices and correspondence relating to termination;
- Background data: previous landlord and employer references, next of kin, dependants, emergency contact details;
- Education data (student accommodation only): university/college, course, year of study, student ID number;
- Health and welfare data: where relevant to safety, evacuation planning or welfare concerns (see Section 6.6 and Section 16);
- Communications: emails, letters, call recordings, maintenance requests and app messages; and
- CCTV and access data: CCTV footage and electronic fob/key entry logs for communal areas, building entrances and, where applicable, bedroom doors.

### **5.2 Guarantors**

- Identity and contact data, employment and financial information used to assess suitability to act as guarantor;
- Bank details and credit reference results; and
- Correspondence relating to the guarantee, including arrears notices.

### **5.3 Landlord Clients**

- Identity and contact data, and proof of property ownership;
- Property portfolio data: insurance details, gas safety and electrical safety certificates, EPCs, licence applications, lender/mortgage restrictions, NRL (non-resident landlord) numbers;
- Financial and accounting data: rent collected, fees, statements, and payment details; and
- Correspondence relating to the management agreement, maintenance instructions, and compliance matters.
- Where the landlord is a company, identity verification data (including Companies House personal codes) for its directors, persons with significant control (PSCs) and authorised signatories, collected to meet our obligations under the Economic Crime and Corporate Transparency Act 2023.

### **5.4 Leaseholders (Individual and Institutional)**

We also process personal data about individual and institutional leaseholders where we manage a block, or provide facilities or block management services, on their behalf, including:

- Identity and contact data of individual leaseholders, and of the appointed contacts, officers or authorised signatories of institutional (corporate) leaseholders;
- Lease and title data: lease term, demise, ground rent and any restrictions relevant to letting or managing the property;
- Service charge and building compliance data: service charge accounts, statutory consultation notices, building insurance and safety records relevant to the leaseholder's unit or interest; and

- Where the leaseholder is a company, identity verification data (including Companies House personal codes) for its directors, PSCs and authorised signatories, collected to meet our obligations under the Economic Crime and Corporate Transparency Act 2023.

### **5.5 Freeholders and Block Managing Agents**

- Identity and contact data of freeholders, their directors, officers or appointed representatives;
- Building ownership, title and lease structure records;
- Service charge accounts, building insurance details, and building safety/compliance records (e.g. fire risk assessments, safety case reports under the Building Safety Act 2022);
- Correspondence relating to block management instructions, major works, and compliance matters; and
- Where the freeholder is an individual (rather than a corporate entity), financial and payment details necessary to administer service charge collection or disbursement.
- Where the freeholder or its managing agent is a company, identity verification data (including Companies House personal codes) for its directors, PSCs and authorised signatories, collected to meet our obligations under the Economic Crime and Corporate Transparency Act 2023.

### **5.6 Prospective Tenants and Website / App Users**

- Enquiry details: name, email, phone number, postal address, course/university (where relevant), property preferences and comments submitted through enquiry or booking forms;
- Technical data: IP address, browser and device type, pages visited, time and duration on our website and app, and referral source; and
- Marketing preferences and consent records, including activity recorded in our CRM and marketing platform (HubSpot).

### **5.7 Suppliers, Contractors and Visitors**

- Contact and business details of contractors, tradespeople and suppliers engaged for repairs, maintenance and facilities management;
- Site visit and access records where contractors attend managed properties; and
- Visitor sign-in details and CCTV images at managed sites and offices.

### **5.8 Special Category Data**

Special category data is data that UK GDPR treats as more sensitive and that requires additional protection. We only collect special category data where necessary and where a valid condition under Article 9 UK GDPR and Schedule 1 of the Data Protection Act 2018 applies (most commonly explicit consent, or substantial public interest relating to health, safety or safeguarding). Examples of special category data we may process include:

- Information about a disability, medical condition or mobility need, including for the purpose of reasonable adjustments or preparing a Personal Emergency Evacuation Plan (PEEP);
- Health information shared with us in connection with a welfare concern or medical emergency (see Section 16); and
- In limited circumstances, information revealing racial or ethnic origin where volunteered as part of equality monitoring, always on an anonymous or optional basis.

We do not require special category data to provide our core lettings and management services, and you are never obliged to disclose it. Where you choose to share it, or where sharing is necessary to protect your vital interests or those of another person, we will handle it with additional safeguards, including restricted access on a need-to-know basis.

## **6. How We Collect Your Data**

### **6.1 Directly From You**

Most personal data is provided directly by you — for example, when you make an enquiry, complete a booking or tenancy application, sign a tenancy agreement, report a maintenance issue, contact our team, or use our website or the MyCloudStudent app.

### **6.2 From Third Parties**

We may also receive personal data about you from:

- Credit reference and tenant referencing agencies;
- Previous landlords, letting agents or employers providing references;
- Other tenants, residents, or guarantors linked to your tenancy;
- Universities, colleges and student accommodation portals (e.g. StuRents) where you have expressed interest via them;

- Local authorities, the Home Office (right to rent checks), and law enforcement agencies;
- Managing agents, freeholders and block/estate management companies; and
- Publicly available sources, including the Electoral Roll and Land Registry.

### 6.3 CCTV and Access Control

Our managed properties are fitted with internal and external CCTV, and, at some sites, electronic fob or key-card entry systems for building and/or bedroom access. See Section 9 for further detail.

### 6.4 Website and Cookies

We collect technical and usage data automatically when you use our website or app, including through cookies. See Section 18 and our separate Cookies Policy for full details.

### 6.5 Social Events and Photography

At social events we host, photographs may be taken and shared on our social media channels or the MyCloudStudent app. If you do not wish to be photographed or to have images of you shared, you may opt out using the form provided at the event or by contacting us.

### 6.6 Welfare and Emergency Situations

Where we have serious concerns about your health, safety or wellbeing, or that of another person, information may be collected from or shared with next of kin, emergency contacts, your university or college, or emergency services. See Section 16 for full detail on how we balance this against your data protection rights.

## 7. Purposes and Lawful Basis for Processing

Under Article 6 of the UK GDPR, we must have a valid “lawful basis” for every purpose for which we use personal data. The table below sets out our main processing activities and the lawful basis (or bases) we rely on. Where we rely on “legitimate interests”, we have carried out a balancing assessment to confirm our interests are not overridden by your rights and interests, and a record of this assessment is available on request.

Where we rely on the lawful basis that processing is “necessary for a contract”, this includes, where applicable but is not limited to, activities such as: carrying out rental reconciliations (reconciling rent, service charges and other sums due under a tenancy or management agreement); and providing relevant contact data to the applicable facilities management company, contractor or tradesperson so that repairs, maintenance or compliance works can be arranged. We only share the minimum information necessary for these purposes, and only where it is required to perform the underlying contract.

| Purpose                                                                                                                            | Lawful basis relied upon                                                     |
|------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------|
| Verifying identity and assessing suitability of a prospective tenant, resident or guarantor                                        | Necessary for a contract; Legal obligation (right to rent)                   |
| Arranging, managing and administering tenancies, including renewals, deposits and terminations                                     | Necessary for a contract                                                     |
| Collecting rent and other payments; recovering arrears and pursuing debt recovery or possession proceedings                        | Necessary for a contract; Legitimate interests                               |
| Carrying out rental reconciliations (reconciling rent, service charges and other sums due under a tenancy or management agreement) | Necessary for a contract                                                     |
| Carrying out credit checks and referencing                                                                                         | Necessary for a contract; Consent (where required by the reference provider) |
| Right to rent / immigration status checks                                                                                          | Legal obligation                                                             |
| Arranging repairs, maintenance and facilities management, including instructing contractors                                        | Necessary for a contract; Legitimate interests                               |

| Purpose                                                                                                                                                                                                   | Lawful basis relied upon                                                                      |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------|
| Providing relevant contact data to the applicable facilities management company, contractor or tradesperson to arrange access, repairs or maintenance, where applicable                                   | Necessary for a contract                                                                      |
| Complying with health and safety, gas safety, electrical safety and building safety obligations (including under the Building Safety Act 2022)                                                            | Legal obligation                                                                              |
| Managing landlord client relationships and property portfolios                                                                                                                                            | Necessary for a contract; Legal obligation                                                    |
| Managing freeholder relationships, building ownership records, service charges and block management compliance                                                                                            | Necessary for a contract; Legal obligation                                                    |
| Maintaining CCTV and access control systems for security purposes                                                                                                                                         | Legitimate interests; Legal obligation (law enforcement requests)                             |
| Preventing, detecting and investigating crime or anti-social behaviour                                                                                                                                    | Legitimate interests; Legal obligation                                                        |
| Handling complaints, disputes and legal claims                                                                                                                                                            | Legitimate interests; Legal obligation                                                        |
| Contacting next of kin/emergency contacts, or sharing welfare concerns, in an emergency                                                                                                                   | Vital interests; Substantial public interest (health/safeguarding)                            |
| Sending service and account communications (e.g. tenancy notices, maintenance updates)                                                                                                                    | Necessary for a contract; Legal obligation                                                    |
| Sending marketing communications about our services                                                                                                                                                       | Consent; Legitimate interests (existing customers, with opt-out)                              |
| Improving our website, app and services; analytics                                                                                                                                                        | Legitimate interests; Consent (non-essential cookies)                                         |
| Using AI tools to assist staff with drafting, summarising and administrative tasks, always subject to human review (see Section 11.2)                                                                     | Legitimate interests                                                                          |
| Complying with tax, accounting and anti-money laundering obligations                                                                                                                                      | Legal obligation                                                                              |
| Responding to requests from courts, regulators or law enforcement                                                                                                                                         | Legal obligation                                                                              |
| Managing recruitment, retention and quality of our services (e.g. reviews, feedback)                                                                                                                      | Legitimate interests                                                                          |
| Applying for, and complying with, HMO, selective and additional property licensing, and other local authority licensing schemes                                                                           | Legal obligation                                                                              |
| Verifying the identity of directors, persons with significant control (PSCs) and authorised signatories of corporate landlord, leaseholder and freeholder clients (Companies House identity verification) | Legal obligation (Economic Crime and Corporate Transparency Act 2023)                         |
| Liaising with universities and colleges under a nominations agreement, including sharing occupant data agreed under that arrangement (see Section 16.1)                                                   | Necessary for a contract; Consent (where required under the agreement)                        |
| Meeting our obligations as a member of the ANUK/Unipol National Code of Standards, including complaints handling and audits/verification visits                                                           | Legitimate interests; Necessary for a contract (where referenced in your occupancy agreement) |
| Conducting the occupant satisfaction survey required under the ANUK/Unipol National Code, which is carried out on our behalf by GSL; taking part in the survey is voluntary                               | Legitimate interests (survey administration); Consent (individual participation is voluntary) |

| Purpose                                                                                                                                                                                  | Lawful basis relied upon                                |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------|
| Managing the death of an occupant, including contacting next of kin or a personal representative and administering the return of a deposit (see Section 8.4)                             | Legal obligation; Vital interests; Legitimate interests |
| Registering and reporting on relevant buildings to the Building Safety Regulator                                                                                                         | Legal obligation (Building Safety Act 2022)             |
| Complying with our obligations under the Renters' Rights Act 2025 where it applies to a tenancy (for example, private rented sector database registration or a mandatory redress scheme) | Legal obligation                                        |

Where we process special category data (see Section 5.8), we additionally rely on explicit consent, or the condition of substantial public interest for reasons of health, safety or safeguarding, or the protection of vital interests where you are physically or legally incapable of giving consent.

Since June 2026, the Data (Use and Access) Act 2025 has introduced a further lawful basis of “recognised legitimate interests” (Article 6(1)(ea) UK GDPR) for a defined list of purposes, including safeguarding and crime prevention, which does not require the balancing assessment described above. Where this basis applies — for example, to sharing information to prevent or detect crime, or in a safeguarding emergency — we rely on it in addition to, or instead of, standard legitimate interests.

## 8. Facilities and Property Management Processing

### 8.1 Facilities and Maintenance

As part of our facilities and property management services, we process personal data to keep buildings safe, compliant and well maintained. This includes:

- Instructing and managing contractors and tradespeople for repairs, planned and reactive maintenance, and health and safety works, which may require sharing your name, contact details and property/room number with the contractor to arrange access;
- Maintaining gas safety records, electrical safety certificates (EICRs), fire risk assessments, and Personal Emergency Evacuation Plans (PEEPs);
- Liaising with block management companies, freeholders and managing agents where we are not responsible for the building as a whole, including compliance obligations under the Building Safety Act 2022;
- Managing Council Tax and utilities accounts and liaising with local authorities and utility providers on behalf of landlord clients;
- Arranging Energy Performance Certificates (EPCs) and other statutory compliance documentation; and
- Managing insurance claims relating to the property, which may require sharing relevant personal data with insurers, loss adjusters and brokers.
- Applying for, and complying with the conditions of, HMO, selective and additional property licensing and other local authority licensing schemes.

Where we manage a property on behalf of a landlord client, we process tenant and resident data both as part of performing our own contract with you, and to fulfil our contractual obligations to the landlord. We will only share the minimum information necessary for these purposes.

### 8.2 Accuracy of Information Provided by Landlords, Leaseholders and Freeholders

Landlord clients, leaseholders, freeholders and block managing agents are responsible for ensuring that any personal data, property information, ownership records and compliance documentation they provide to us — including proof of ownership, safety certificates, insurance details, licensing information and service charge records — is accurate, complete and kept up to date. We rely on this information to perform our management and facilities obligations, and to provide accurate information to tenants, residents, contractors and other third parties.

Where a landlord, leaseholder, freeholder or block managing agent provides personal data or property information that is inaccurate, incomplete or out of date, and we have acted on it in good faith, we will not be liable for any resulting inaccuracy, loss, or compliance failure arising from that inaccurate information, save to the extent required by law. Landlord clients, leaseholders, freeholders and block managing agents agree to notify us promptly of any change to information they have provided, and to indemnify us against any claim, loss, regulatory fine or other liability we incur as a result of inaccurate, incomplete or misleading information they have supplied.

This does not affect our own obligation, on becoming aware of an inaccuracy, to correct our records promptly and, where appropriate, to notify anyone to whom the inaccurate data was disclosed. This provision operates alongside, and does not replace, the data protection and accuracy obligations set out in our management agreement or terms of business with the relevant landlord, leaseholder, freeholder or block managing agent.

### **8.3 Liaising with External Block Management Companies (Room-Only Lets)**

Where we let a single room or unit within a building that is owned or managed by an external block management company, freeholder or managing agent that we do not otherwise manage, we act as an independent controller for the data we collect to let and manage that room (for example, tenant referencing, tenancy administration and rent collection). The block management company remains the controller for the building-wide systems it operates itself, such as communal CCTV, fob or key-card access, fire safety and building insurance. Where we need to share limited data with the block management company to arrange access, deal with a repair, or comply with a building-wide safety obligation (for example, under the Fire Safety Act 2021 or the Building Safety Act 2022), we do so under a written data-sharing or management arrangement that sets out what is shared and why, consistent with Section 8.2 above.

### **8.4 Death of an Occupant**

If an occupant dies while they hold a tenancy or licence with us, we will contact their next of kin, nominated contact, executor or personal representative to offer them the opportunity to collect the occupant's personal belongings, and we will notify the relevant tenancy deposit protection scheme that the deposit may be released to that person, in line with the ANUK/Unipol National Code of Standards. We will not pursue outstanding liabilities that arose before the date of death, and we will refund, on a daily pro-rata basis, any rent or fee paid in advance for a period after that date. Personal data processed in these circumstances — including the personal data of the next of kin, executor or personal representative — is handled in line with the security and retention standards set out elsewhere in this Policy.

## **9. CCTV, Access Control and Building Security**

Our managed buildings use CCTV (internal and external) to protect the safety and security of residents, staff, and visitors, and to deter, detect and investigate crime and anti-social behaviour. Signage is displayed at properties where CCTV is in operation.

Some properties also use electronic fob, key-card or PIN entry systems for building and/or bedroom access, which create access logs. These systems are used solely for security and safe access purposes.

CCTV footage is normally retained for a maximum of 30 days on a rolling basis, unless retained for longer because it is needed as evidence for an ongoing investigation, complaint, or legal claim.

Access to CCTV footage and access logs is restricted to authorised personnel on a need-to-know basis.

Footage may be shared with the police or other law enforcement agencies where legally requested, or with legal advisers in connection with a dispute.

## **10. Marketing Communications**

We may send you information about our products, services and offers by post, email, SMS or telephone, where you are an existing customer and have not opted out, or where you have given consent.

We use HubSpot, a third-party customer relationship management (CRM) and marketing automation platform, to manage marketing communications, email campaigns, enquiry follow-up and communication preferences. Personal data processed in HubSpot for this purpose is limited to contact and enquiry details, marketing preferences, and records of engagement with our communications (such as email opens and link clicks), and is handled under a data processing agreement requiring HubSpot to protect it to UK GDPR standards. See Section 13 for details of related international transfers.

We do not share your personal data with external organisations for their own marketing purposes without your explicit consent. We may share limited data with trusted collaborators (for example, referral or booking partners such as StuRents, or selected service providers) strictly to help us provide our services to you.

You can opt out of marketing at any time by:

- Clicking “unsubscribe” on any marketing email;
- Contacting us at [info@cloudstudenthomes.co.uk](mailto:info@cloudstudenthomes.co.uk); or
- Updating your communication preferences in the MyCloudStudent app, where available
- 

Opting out of marketing will not affect service communications necessary for the management of your tenancy or account.

## **11. Automated Decision-Making, Profiling and Use of AI Tools**

### **11.1 Automated Decision-Making and Profiling**

We use credit reference and referencing checks to help assess the suitability of prospective tenants and guarantors. These checks may involve automated elements (such as a credit score), but we do not make final letting decisions based solely on automated processing without meaningful human review. You have the right to request human review of, and to contest, any decision that is based solely on automated processing and produces a legal or similarly significant effect on you, and, since the Data (Use and Access) Act 2025, to make representations about such a decision before it is finalised. To request this, contact us using the details in Section 22.

### **11.2 Our Use of Artificial Intelligence (AI) Tools**

We use artificial intelligence (AI) tools to help our staff work more efficiently — for example, to draft and check correspondence, summarise documents, and support administrative and property management tasks. AI is used only as an assistive tool. It does not make decisions about your tenancy, application, or any other matter affecting you, and every AI-assisted output is reviewed and approved by a trained member of staff before it is used, sent to you, or relied upon.

Our approved AI tool is Claude, provided by Anthropic, PBC, under an enterprise (Team Plan) agreement. Under this agreement, Anthropic does not use the data we submit to train its underlying AI models, and data is encrypted in transit and at rest. Use of this tool is restricted to authorised staff, and our internal AI Policy sets out data minimisation requirements, including restrictions on entering full identity documents, complete financial or bank details, special category data, or bulk personal records into AI tools without specific authorisation from our Data Protection Officer.

We do not use AI to make any decision that has a legal or similarly significant effect on you — such as a decision about tenancy acceptance, rejection, or a deposit dispute — without meaningful human review, consistent with your rights described in Section 11.1 and Section 19. Where our AI provider is based outside the UK, we ensure an appropriate safeguard is in place for the transfer, as described in Section 13 (International Data Transfers).

If you have any questions about our use of AI, or wish to understand more about how it has been used in connection with your tenancy or application, please contact us using the details in Section 22.

### **11.3 AI Used by Our Third-Party Processors and Suppliers**

Some of our third-party processors and suppliers — for example, our CRM and marketing platform, tenancy management software, or other IT service providers — may themselves use AI tools or AI-enabled features as part of the services they provide to us. Before engaging any such processor, and periodically thereafter, we carry out due diligence to understand how personal data is used within their systems, including whether AI features are involved and, where applicable but not limited to, how securely that data is processed.

Where a processor's service includes AI functionality, we require, through our written data processing agreement with that processor, that they:

- process personal data only on our documented instructions and only for the purposes we have authorised;
- do not use personal data we share with them to train, fine-tune or otherwise improve their AI models, and do not share it with any AI provider that would do so, without our prior written consent;
- apply technical and organisational security measures consistent with Articles 28 and 32 of the UK GDPR, including encryption, access controls, and staff training on the safe use of AI;
- flow down equivalent data protection and AI-use obligations to any sub-processor or underlying AI provider they engage; and
- notify us promptly of any actual or suspected personal data breach, including one arising from an AI feature or integration, so that we can meet our own reporting obligations under Section 21.

Our internal AI Policy and wider data protection standards govern how we select, contract with and monitor any processor whose service involves AI, and we reserve the right to require a processor to disable, restrict or discontinue an AI feature where we consider it does not meet these standards. Where a processor introduces a new AI feature that would materially change how your personal data is processed, we will carry out an appropriate risk assessment and, where necessary, update this Policy before that feature is used in connection with your data.

## **12. Who We Share Your Data With**

We only share personal data where necessary, proportionate, and where we have a lawful basis to do so. Categories of recipients include:

| Recipient                                                                                                  | Purpose of sharing                                                                                                                                                                                                                  |
|------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Landlord clients and their representatives                                                                 | To provide letting and management services, and to fulfil our contractual obligations to landlords                                                                                                                                  |
| Other letting/managing agents, or a new landlord                                                           | Where a property is sold, transferred, or a management instruction changes, to ensure continuity of your tenancy                                                                                                                    |
| Guarantors                                                                                                 | To manage the guarantee and pursue arrears where applicable                                                                                                                                                                         |
| Credit reference and tenant referencing agencies                                                           | To assess financial standing and suitability                                                                                                                                                                                        |
| Deposit protection scheme administrators (e.g. DPS, TDS, mydeposits)                                       | To protect and, where appropriate, resolve disputes over your tenancy deposit                                                                                                                                                       |
| Contractors, tradespeople and facilities management suppliers                                              | To carry out repairs, maintenance and safety works                                                                                                                                                                                  |
| Block management companies, freeholders and managing agents                                                | Where required under building/estate management arrangements, including Building Safety Act 2022 obligations                                                                                                                        |
| Local authorities and utility providers                                                                    | To confirm Council Tax liability/exemptions, Electoral Roll registration, and utility accounts; and to apply for and comply with HMO, selective and additional property licensing                                                   |
| Debt collection agencies and legal advisers                                                                | Where rent or other sums are in arrears, or to bring or defend legal claims                                                                                                                                                         |
| Courts and tribunals                                                                                       | In connection with possession or other legal proceedings                                                                                                                                                                            |
| The police and other law enforcement agencies                                                              | To prevent, detect or investigate crime, or to respond to a lawful request                                                                                                                                                          |
| Emergency contacts / next of kin                                                                           | In an emergency or serious welfare concern; or, following the death of an occupant, to offer to release personal belongings and to notify the deposit scheme administrator that a deposit may be released to them (see Section 8.4) |
| Universities and colleges                                                                                  | To verify enrolment, or to share serious welfare concerns (see Section 16); or under a nominations agreement, to share the occupant data agreed in that arrangement (see Section 16.1)                                              |
| Public health bodies (e.g. UK Health Security Agency)                                                      | To support management of a public health incident or outbreak affecting a property                                                                                                                                                  |
| IT, software and cloud service providers (data processors), including HubSpot (CRM and marketing platform) | To operate our tenancy management systems, the MyCloudStudent app, parcel tracking, marketing communications, payment processing and IT infrastructure                                                                              |
| Our approved AI provider, Anthropic (Claude), under an enterprise agreement                                | To assist authorised staff with drafting, summarising and administrative tasks, subject to data minimisation and human review; never used to make automated decisions about you (see Section 11.2)                                  |
| Insurers, brokers and loss adjusters                                                                       | To manage property or liability insurance and claims                                                                                                                                                                                |
| Professional advisers (accountants, auditors, solicitors)                                                  | To obtain professional advice and meet legal/accounting obligations                                                                                                                                                                 |
| Regulators and redress schemes (e.g. ICO, The Property Ombudsman)                                          | To comply with regulatory obligations and handle complaints                                                                                                                                                                         |
| Prospective buyers of a property and their solicitors/agents                                               | Where a property is being marketed or sold, limited to rent, payment status and tenancy information                                                                                                                                 |

| Recipient                                                                                        | Purpose of sharing                                                                                                                                                                                                                                                                                                                               |
|--------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Referral and marketing partners (e.g. StuRents)                                                  | Only with your consent, or to fulfil a service you have requested                                                                                                                                                                                                                                                                                |
| ANUK/Unipol National Code Administrator, Audit Panel, Codes Complaints Investigator and Tribunal | To meet our obligations as a National Code member, including escalated complaints, audits and verification visits, and submission of anonymised building-level statistics (shared onward, non-identifiably, with the Office for National Statistics, the Department for Education and the Ministry of Housing, Communities and Local Government) |
| GSL (survey provider)                                                                            | To carry out the ANUK/Unipol National Code occupant satisfaction survey on our behalf; taking part is voluntary and declining to respond does not affect your tenancy                                                                                                                                                                            |
| Companies House                                                                                  | To verify the identity of directors, PSCs and authorised signatories of corporate clients, in line with the Economic Crime and Corporate Transparency Act 2023                                                                                                                                                                                   |
| The Building Safety Regulator                                                                    | To register and report on relevant high-rise buildings under the Building Safety Act 2022                                                                                                                                                                                                                                                        |

We do not sell your personal data. A full list of specific recipients relevant to your circumstances is available on request by contacting us using the details in Section 22.

Where we engage third parties to process personal data on our behalf (data processors), we put a written contract in place requiring them to protect your data to a standard consistent with the UK GDPR and to act only on our instructions. Where a processor's service involves the use of AI, additional safeguards apply — see Section 11.3.

### 13. International Data Transfers

Some of our service providers (for example, cloud storage, software or payment providers) may store or process personal data outside the UK, including in the United States or the European Economic Area.

Where we transfer personal data outside the UK, we ensure an appropriate safeguard is in place, which will be one of the following:

- A UK adequacy regulation confirming the destination country provides an adequate level of data protection;
- The UK International Data Transfer Agreement (IDTA) or the UK Addendum to the EU Standard Contractual Clauses; or
- Another safeguard recognised under the UK GDPR.

For example, our CRM and marketing platform, HubSpot, is provided by a US-based company. Personal data processed through HubSpot may be transferred to, and stored in, the United States. HubSpot is certified under the UK Extension to the EU-US Data Privacy Framework, which the UK Government recognises as providing an adequate level of protection for such transfers, and its data processing agreement additionally incorporates the UK International Data Transfer Agreement / Standard Contractual Clauses as a fallback safeguard.

Similarly, our approved AI tool, Claude, is provided by Anthropic, PBC, a US-based company (see Section 11.2). Where any personal data is transferred to Anthropic in connection with our use of this tool, that transfer is governed by a data processing agreement incorporating the UK International Data Transfer Addendum to the EU Standard Contractual Clauses, providing a safeguard recognised under the UK GDPR.

You can request further details, including a copy of the relevant safeguard, by contacting us using the details in Section 22.

### 14. Data Retention

We do not keep personal data for longer than is necessary for the purposes it was collected. Retention periods are based on legal, regulatory and contractual requirements, and are reviewed periodically. Indicative retention periods are set out below; exact periods may vary depending on individual circumstances (for example, an ongoing dispute or legal claim).

| Category of data                                    | Typical retention period          |
|-----------------------------------------------------|-----------------------------------|
| Enquiry / prospective tenant data (no booking made) | Up to 12 months from last contact |

| Category of data                                                                                                   | Typical retention period                                                                                                                           |
|--------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|
| Tenancy, referencing and correspondence records                                                                    | Duration of tenancy, plus 6 years after it ends                                                                                                    |
| Guarantor records                                                                                                  | Duration of guarantee, plus 6 years after the guarantee ends                                                                                       |
| Right to rent / immigration check records                                                                          | Duration of tenancy, plus at least 1 year after it ends, in line with Home Office guidance                                                         |
| Financial and rent payment records                                                                                 | 6 years, in line with tax and accounting requirements                                                                                              |
| Anti-money laundering / identity verification records (where applicable)                                           | 5 years, in line with the Money Laundering Regulations 2017                                                                                        |
| Tenancy deposit protection records                                                                                 | 6 years after the deposit is protected/returned                                                                                                    |
| Landlord client and property portfolio records (certificates, EPCs, instructions)                                  | Duration of instruction, plus 6 years after it ends                                                                                                |
| Maintenance and contractor records                                                                                 | 6 years, reflecting contractual and health & safety liability periods                                                                              |
| Complaints, disputes and legal claims                                                                              | 6 years after resolution, or longer if required for ongoing/anticipated litigation                                                                 |
| CCTV footage                                                                                                       | Up to 30 days on a rolling basis, unless needed for an investigation or legal claim                                                                |
| Access control / fob entry logs                                                                                    | Up to 90 days, unless needed for an investigation                                                                                                  |
| Marketing consent and preference records                                                                           | Until consent is withdrawn, plus a record kept for up to 3 years as evidence of consent                                                            |
| Website and app analytics / cookie data                                                                            | Up to 26 months (see Cookies Policy for full detail)                                                                                               |
| Leaseholder and freeholder director/PSC identity verification records                                              | Duration of the business relationship with the corporate client, plus 6 years, in line with Companies House and anti-money laundering requirements |
| Occupant satisfaction survey responses (collected via GSL; participation is voluntary)                             | 3 years, or until superseded by the next survey                                                                                                    |
| On-site incident, crisis and welfare records                                                                       | 6 years, reflecting safeguarding and liability periods                                                                                             |
| Records relating to a deceased occupant's tenancy and correspondence with next of kin or a personal representative | 6 years after the tenancy ends, consistent with other tenancy records                                                                              |

At the end of the applicable retention period, personal data is securely deleted, destroyed or anonymised.

## 15. Keeping Your Information Secure

We are committed to keeping personal data secure. We maintain appropriate technical and organisational measures to protect personal data against unauthorised or unlawful processing, and against accidental loss, destruction or damage. These measures include:

- Password-protected and access-controlled IT systems and tenancy portals;
- Locked physical storage for paper records;
- Encryption of data in transit where appropriate;

- Restricting access to personal data to employees and contractors on a need-to-know basis; and
- Mandatory data protection and GDPR training for all staff who handle personal data, aligned with ICO guidance.

While we take reasonable steps to protect information transmitted to us over the internet, no transmission method is completely secure, and any such transmission is at your own risk. Once we receive your information, we apply strict procedures to prevent unauthorised access.

If you become aware of, or suspect, a security incident — for example, a compromised account password, or suspicious communications purporting to be from Cloud Student Homes — please report it immediately to [info@cloudstuenthomes.co.uk](mailto:info@cloudstuenthomes.co.uk).

Where we (or a processor acting on our behalf) experience a personal data breach that poses a risk to your rights and freedoms, we will notify the ICO within 72 hours of becoming aware of it, where required to do so, and will inform affected individuals without undue delay where the breach is likely to result in a high risk to them.

## **16. Sharing Information with Universities, Colleges and Wellbeing Concerns**

The wellbeing of our residents is a priority. This section explains what happens if we have serious concerns about your health or safety, and how we balance this against your data protection rights. It also explains how we share information with universities and colleges under a nominations agreement.

### **16.1 Nominations Agreements**

Where we provide accommodation as part of a nominations agreement with a university or college (broadly, where a student's room is suggested or allocated to them by their institution for more than 12 weeks), we put in place an information-sharing agreement with that institution before any ongoing sharing of occupant data takes place. That agreement sets out clearly what personal data may be shared, and why — for example, information relevant to wellbeing, financial or disability support that the institution also provides. We will seek your consent to this sharing as part of our contractual arrangements with you. Where such an agreement is not in place, or where you have not given your consent, we will not share your personal data with the institution under a nominations agreement. This does not affect the separate, limited circumstances described at Section 16.3 below, where we may share welfare information without consent in a genuine emergency.

### **16.2 Seeking Your Consent**

Where possible, we will seek your consent before sharing any information about a welfare concern with your university or college.

### **16.3 Sharing Without Consent in Limited Circumstances**

There are limited circumstances where we may share welfare information without your consent, including:

- In a genuine emergency where there is no time to obtain consent;
- Where you are unconscious or otherwise unable to give consent; or
- Where your mental state means you are not willing to consent, but we believe your life or health is at serious risk.

In these circumstances, we rely on the lawful bases of vital interests and/or substantial public interest (safeguarding) to justify sharing the minimum information necessary, which may include your name, institution, course, date of birth, student ID (if known), contact details, a description of the situation, and any action taken.

### **16.4 Why We Do This**

We consider that helping you access appropriate support as quickly as possible, and protecting the wellbeing of other residents and staff, can outweigh data protection concerns in genuine emergencies. This approach is intended to support you, not to penalise you, and any sharing is limited to what is necessary and proportionate.

## **17. Children's and Dependants' Data**

Our services are not directed at children, and we do not knowingly collect personal data from individuals under 18 other than as necessary in relation to a tenancy (for example, details of a dependant living with a resident, or emergency contact information). Where we become aware that a child's personal data has been provided to us without appropriate parental or guardian consent where required, we will take steps to remove that data unless we have another lawful basis for retaining it.

## **18. Cookies and Website Data**

When you use our website or app, we may collect information such as the pages you visit, your activity (e.g. properties viewed, tours requested), and technical information about your device, browser and IP address. We use cookies (small text files placed on your device) to support this, including cookies set by HubSpot to track enquiry forms, marketing attribution and engagement with our website. Some cookies are essential to the operation of our website; others (such as analytics or HubSpot marketing cookies) are only used with your consent, which you can manage through our cookie banner or browser settings. Full details are set out in our separate Cookies Policy, available on our website.

Following the Data (Use and Access) Act 2025's changes to the rules on cookies (in force from June 2026), some low-risk cookies used only for anonymous statistical purposes may no longer require consent. We are reviewing our cookie banner and Cookies Policy to reflect this change, and will update both before relying on any new exemption.

## 19. Your Rights Under UK GDPR

As a data subject, you have the following rights in relation to your personal data, subject to certain exemptions and conditions set out in law:

| Right                                                     | What it means                                                                                                                                                                                                                                                       |
|-----------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Right to be informed                                      | To receive clear, transparent information about how we use your personal data (as set out in this Policy).                                                                                                                                                          |
| Right of access                                           | To request a copy of the personal data we hold about you (a “data subject access request” or DSAR).                                                                                                                                                                 |
| Right to rectification                                    | To ask us to correct inaccurate or incomplete personal data.                                                                                                                                                                                                        |
| Right to erasure                                          | To ask us to delete your personal data in certain circumstances (also known as the “right to be forgotten”).                                                                                                                                                        |
| Right to restrict processing                              | To ask us to limit how we use your personal data, for example while a dispute over accuracy is resolved.                                                                                                                                                            |
| Right to data portability                                 | To receive certain personal data in a structured, commonly used, machine-readable format, or to have it transferred to another organisation.                                                                                                                        |
| Right to object                                           | To object to processing based on legitimate interests, or to direct marketing at any time.                                                                                                                                                                          |
| Rights related to automated decision-making and profiling | To request human review of, and to contest, decisions made solely by automated means that have a legal or similarly significant effect on you, and, since the Data (Use and Access) Act 2025, to make representations about such a decision before it is finalised. |
| Right to withdraw consent                                 | Where we rely on consent, to withdraw it at any time, without affecting the lawfulness of processing carried out before withdrawal.                                                                                                                                 |

## 20. How to Exercise Your Rights / Data Subject Access Requests

To exercise any of the rights above, please contact us at [info@cloudstuenthomes.co.uk](mailto:info@cloudstuenthomes.co.uk), quoting your name and the property or tenancy reference, and specifying which right you wish to exercise.

We will normally respond within one month of receiving your request and confirming your identity.

This period may be extended by a further two months for complex or numerous requests; if so, we will explain why within the first month.

There is normally no fee for a request. However, we may charge a reasonable administrative fee, or refuse to act, if a request is manifestly unfounded, excessive, or repetitive.

We may need to verify your identity before responding, and may ask you to provide additional information to help us locate the personal data you are asking about.

## 21. Data Breach Notification

We maintain internal procedures for detecting, reporting and investigating any actual or suspected personal data breach. Where a breach is likely to result in a risk to individuals' rights and freedoms, we will notify the ICO without undue delay and, in any event, within 72 hours of becoming aware of it, where required by law. Where a breach is likely to result in a high risk

to affected individuals, we will notify those individuals directly without undue delay, and will provide guidance on steps they can take to protect themselves.

## **22. Data Protection Contact and Contact Us**

If you have any questions about this Policy, how we handle your personal data, or wish to exercise your rights, please contact us:

- Email: [info@cloudstudenthomes.co.uk](mailto:info@cloudstudenthomes.co.uk)
- Data protection queries: [dpo@cloudstudenthomes.co.uk](mailto:dpo@cloudstudenthomes.co.uk)
- Telephone: +44 (0)330 053 5701
- Post: Old Fire Station, Salt Lane, Salisbury, SP1 1DU, United Kingdom

## **23. Changes to This Policy**

We may update this Policy from time to time to reflect changes in our practices, our services, or the law, including future developments arising from the Data (Use and Access) Act 2025. Where we make material changes, we will notify you by updating this page, and, where appropriate, through direct communication (such as email or a notice on the MyCloudStudent app). We encourage you to review this Policy periodically.

We are also monitoring the rollout of the Renters' Rights Act 2025 and the Leasehold and Freehold Reform Act 2024, both of which are being brought into force in stages. Where these introduce new processing — for example, private rented sector database registration, a mandatory landlord redress scheme, or standardised leaseholder service charge reporting — we will update this Policy accordingly.

## **24. How to Complain**

If you are unhappy with how we have handled your personal data, please contact us first at [info@cloudstudenthomes.co.uk](mailto:info@cloudstudenthomes.co.uk) so that we can try to resolve your concern directly.\

You also have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK's independent regulator for data protection:

- Website: [ico.org.uk/make-a-complaint](https://ico.org.uk/make-a-complaint)
- Telephone: 0303 123 1113
- Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

If your complaint relates to our conduct as a letting or managing agent more generally (rather than specifically to data protection), you may also be able to refer it to The Property Ombudsman, of which we are a member.

## **25. Links to Other Websites**

Our website and marketing communications may contain links to third-party websites that are outside our control. We are not responsible for the content, privacy practices, or security of those websites. We encourage you to review the privacy policy of any third-party website before providing personal data to it.

Where you are introduced to us via a third-party letting agent, this Policy applies to how Cloud Student Homes processes your data once received; the third-party agent's own privacy policy will govern their collection of your data prior to that point.