



## Data Protection

# Privacy Notice

Keysafe UK Limited is a company instructed by your proposed letting agent (PLA) to provide a vetting and referencing service in order that you and the PLA may enter into a tenancy agreement.

This notice explains what personal data (information) we hold about you, how we receive it, and how we use and may share information about you during the vetting process and after it ends. We are required to notify you of this information under data protection legislation. Please ensure that you read this Privacy Notice and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

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## Who collects the information?

Keysafe UK Limited ('Company') is a 'data processor' and gathers and uses certain information about you on behalf of the PLA that is the 'data controller'.

## Data protection principles

We will comply with the data protection principles when gathering and using personal information, as set out in this Privacy Notice.

## About the information we collect and hold

We may collect the following information about you during the vetting process on behalf of the Controller:

- Your name, contact details (i.e. address, home and mobile phone numbers, email address) and emergency contacts (i.e. name, relationship and home and mobile phone numbers);
- History of the last 3 years of addresses;
- Employment contract information;
- Details of your bank/building society, National Insurance and tax information, your age;
- Details of your spouse/partner and any dependants;
- Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information;
- A copy of your driving licence;
- Your racial or ethnic origin;
- Details of 3 referees that we shall contact during the vetting process;
- References received from referees.



## How we collect the information

Your PLA shall send a Keysafe UK web link to you which when clicked, will open this Privacy Notice, an application form and some guidance notes to complete that form correctly. The information you provide on the application form is then downloaded onto our internal system.

## Why we collect the information and how we use it

We will typically collect and use this information for the following purposes (other purposes that may also apply are explained in this Privacy Notice:

- for the performance of a contract with you, or to take steps to enter into a contract. This applies to your case as you may enter a contract with your PLA
- for compliance with a legal obligation to confirm your Right to Rent in the UK; and
- for the purposes of our legitimate interests or those of a third party (such as your PLA), but only if these are not overridden by your interests, rights or freedoms. We have a legitimate interest to process your data due to our agreement with your PLA who has instructed us to do so.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any material changes to information we collect or to the purposes for which we collect and process it. This information is also used by our associates namely, our Credit Reporting Agency, TransUnion International UK Limited (<https://www.transunion.co.uk/legal-information/bureau-privacy-notice>), and Yoti Limited who verify your identity documents and Right to Rent in the UK.

When you have submitted your application form, the following will happen on an automated basis:

- credit check by TransUnion International UK Limited;
- anti-money laundering check by TransUnion International UK Limited; and
- your referees will be sent an email using the email addresses provided on the application form.

A representative of Keysafe UK Limited will then review the information collected about you. We may contact you to inquire about information that has already been requested from you but has not yet been received. When all of the required information has been received and reviewed by a representative of Keysafe UK Limited, we will send report to your PLA.

## Our Open Banking partner

We will use Open Banking facilitated by our partner, Salt Edge Limited, to see your bank account information. It sets the highest standard for banking APIs.

But, because the legislation doesn't cover all banks (and only current accounts), a few won't have their API ready. If this is the case, we use data aggregation instead.

In both instances we use Salt Edge Limited because they are:

- ISO/IEC 27001 certified
- PCI/DSS compliant
- Connecting over 3700 financial services providers in over 70 countries
- GDPR compliant
- A licensed AISP and PISP
- Based in the UK
- Regulated by the FCA

By clicking the "I accept the terms and conditions" box on the page where we ask if we can link to your bank account in this way, you are agreeing that we can share your information with Salt Edge. You do not have to agree with this, and if not, it will simply mean that this additional information will not be contained in the report that goes to your PLA.



Salt Edge can access account information of end-customers (you) based on PSD2/Open Banking explicit consent and after the successful end-customer's authentication and authorization on the side of the bank. They request one-time access to your account information. All your financial information is irreversibly deleted on the Salt Edge side within a 6-hour period.

Salt Edge only keeps an audit log of consents and statistical information that is required for regulatory reporting (i.e., number of connections, errors, etc.). They access account information once and then automatically revoke consent and delete the retrieved data.

Keysafe also deletes the data in accordance with the **Privacy Notice**. In regard to proving the deletion of the data, Salt Edge's audit log contains details per each connection starting from the consent creation, redirecting to the bank for authentication and authorisation, automatic consent revocation and deleting the data. The retrieved account information is strictly and expressly used only for the indicated purpose.

## Sensitive personal information

This is defined by law as information about your health, political views, trade union memberships, spiritual or philosophical beliefs, sex life or sexual orientation or racial origins. We require information about your racial origin in order that we may ask Yoti Limited to validate your identify documents and verify your Right to Rent in the UK. We will never pass this information to anybody else unless we are required to by law.

Our lawful basis for processing this information is our legitimate interest due to our agreement with your PLA who has instructed us to do so. In addition, the processing is necessary for the purposes of carrying out obligations of the Controller in the field of social security law in that there is a legal obligation to confirm your Right to Rent in the UK.

Yoti Limited are registered with the Information Commissioner and will keep your information confidential.

## How we may share the information

We do not share personal information with companies, organisations or individuals outside Keysafe UK Limited apart from the circumstances below.

We will need to share some of the above categories of personal information with other parties, such as your referees and credit reference agencies. Usually, information will be anonymised, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations. We may also be required to share some personal information as required to comply with the law.

We will also share the information received from your referees and our associates with your PLA in the report we send them. In addition, your PLA will be able to see your application form and any notes and documents stored on the Keysafe UK Limited system at any time throughout the vetting and referencing process. The report provided to the PLA will signify a "pass" or "fail" recommendation which the PLA will use to determine whether they can enter into a tenancy agreement with you.

We may share information that is not personally identifiable with your PLA for the purposes of compiling statistical data and trends about the general use of services.

We will not transfer any personal data outside the European Economic Area (EEA), which comprises the countries in the European Union and Iceland, Liechtenstein and Norway.





## Where information may be held

Information may be held at our offices and those of our group companies, and third-party agencies, service providers, representatives and agents as described above.

## When this Privacy Notice applies

This Privacy Notice applies to all of the processes that Keysafe UK Limited undertakes. This excludes organisations that have separate privacy policies that do not incorporate this Privacy Notice.

## How long we keep your information

We keep your information during and after the vetting process for no longer than is necessary for the purposes for which the personal information is processed. We require that your personal data is kept for 15 months from the date that the referencing process is completed.

## Your right to correct, access and delete your information

Please contact Gareth Fowler, who can be contacted on [gareth@keysafetv.com](mailto:gareth@keysafetv.com) if (in accordance with applicable law) you would like to correct or request access to information that we hold relating to you or if you have any questions about this notice. You also have the right to ask Gareth Fowler for some but not all of the information we hold and process to be erased (the 'right to be forgotten') or restricted in certain circumstances. Gareth Fowler will provide you with further information about the right to be forgotten and restrictions on processing, if you ask for it.

## Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so. We regularly review our compliance with data protection legislation and therefore the information in this Privacy Notice may change from time to time. We will not reduce your rights under this Privacy Notice without your consent.

## How to complain

We hope that Gareth Fowler can resolve any query or concern you raise about our use of your information. If not, contact the Information Commissioner at [ico.org.uk/concerns/](https://ico.org.uk/concerns/) or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

