

Privacy Notice

Data Protection REC 4.1

September 2023
V7

1. Privacy Notice

1.1 Who are we?

Our Data Manager - Adam McGhin / Data Protection Owner - Richard Flynn can be contacted directly here:

E enquiries@graingerplc.co.uk

T +44 (0) 191 261 1819 (Newcastle office)

1.2 How we use your information

This privacy notice tells you what to expect when Grainger plc, or its subsidiaries ("Grainger"), collects personal information. It applies to information we collect about:

- visitors to our websites;
- applicants for or tenants of our rental/leasehold properties; and
- job applicants (permanent or contract) and our current and former employees.

2. Visitors to our website and how we use cookies

You can read more about how we use cookies on our Cookies page.

Grainger uses a third-party service to help maintain the security and performance of the Grainger website. To deliver this service it processes the IP addresses of visitors to the Grainger website.

3. People who email us

We use Transport Layer Security (TLS) to encrypt and protect email traffic wherever possible. If your email service does not support TLS, you should be aware that any emails we send or receive may not be protected in transit.

We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

4. Applicants for, or tenants, of our rental properties and tenants/owners in Grainger communities

We collect and use personal information about you in the course of providing letting, community and property management services ("the Services"), including Grainger Online Portals and the Grainger App ("the Portal"). The personal information we collect includes:

4.1 Information that you provide to us

- a. The information that you provide to us may include your name, postal address, email address, telephone number, employment details, (including your employer, employment start date, type of employment contract, manager name, salary and details of any probation period) financial and payment card information (credit or debit card), photographic identification information (such as your driving licence and passport), proof of your entitlement to reside and rent property in the UK and details of any guarantor (if applicable). This information may be provided:
 - in the course of communications between you and us (including by phone, email or otherwise);
 - when you register to use the Portal;
 - when you fill in forms for us (including any rental application forms, tenancy documents or those on the Portal); and

- via our social media pages, other social media content, tools and applications.

4.2 Information we collect from you

- a. technical information (including your login information for the Portal and, to the extent that they constitute personal information, the IP address you use to connect your device to the Internet and the browser type and version you use on your device);
- b. information about your use of the Portal and the Services;
- c. information contained in and records of communications between you and us, including emails, letters and text messages. We may also record calls between us for training, monitoring and quality control purposes; and
- d. information regarding your marketing preferences.
- e. live images of individuals from CCTV footage.

4.3 Information we receive from other sources

- a. information from any of the other websites we operate or the other services we provide (if you use any of them);
- b. information regarding energy consumption.
- c. information from reference checking agencies (including your credit rating, details of any County Court Judgements made against you, employment checks and landlord referencing.
- d. information we obtain from individuals who you have listed as references in your rental application form; and
- e. information we obtain from publicly available sources such as Facebook or LinkedIn.

We may also collect certain sensitive personal information about you. This may include information concerning your relationship status, health or the health of any persons living in the rental property or otherwise accessing the rental property (for example, where this requires us to alter the way we perform the Services).

4.4 Information about third parties

In the course of using the Portal you may provide us with personal information relating to third parties, including other occupiers of the rental property at which you reside (for example, your dependants), your guarantor(s) or your neighbours (as applicable). For example, the personal information we collect in respect of:

- guarantors; includes their name, address, telephone number and email address;
- permitted occupiers; includes their name, relationship to you, address, telephone number and email address; and
- other tenants; includes their name, relationship to you, address, telephone number, employer and email address.

We will use this personal information in accordance with this Privacy Policy. If you are providing personal information to us relating to a third party, you confirm that you have the consent of the third party to share such personal information with us and that you have made the information in this Privacy Policy available to the third party.

4.5 How do we use the personal information we collect about you?

Purpose	Legal Basis
To communicate with you and other individuals.	This is in our legitimate interests.
To assess your tenancy application and decide whether your application will be successful.	This is in our legitimate interests.
To carry out our obligations arising from any contracts entered into between you and us (including your Tenancy Agreement) and to provide you with the Services.	This is to perform a contract between you and us or in our legitimate interests.
To notify you about changes to the Portal or the Services.	This is in our legitimate interest.
To improve the quality of the Portal, the Services and our training.	This is in our legitimate interest.
To manage complaints, feedback and queries.	This is in our legitimate interests.
To carry out satisfaction surveys and analysis.	This is in our legitimate interests.
To provide you with information about the services we offer (including details of any properties which we believe may be of interest to you) in accordance with your preferences as indicated either when you make a property enquiry, or when you enter into a Tenancy Agreement with us, including any marketing consent preferences.	We can do this based on your consent.
To comply with any legal or regulatory obligations (including in connection with a court order).	We do this for compliance with legal obligations to which we are subject.
To record and report on our carbon emissions and to analyse energy consumption with a view to reducing our footprint.	We do this for compliance with legal obligations to which we are subject and this is in our legitimate interests.
To analyse the profile of the residents within our buildings on an aggregate level.	This is in our legitimate interests.
To enforce or apply the agreements concerning you (including agreements between you and us).	This is in our legitimate interests.
When we install CCTV this is for security purposes. We may also use CCTV to detect breaches of the tenancy terms, e.g. in the common parts or outside the	This is in our legitimate interests.

Purpose	Legal Basis
building. Recordings will be kept for these purposes.	

We use your personal information in connection with the provision of the Portal and the Services to you. In particular, your personal information may be used by us, our employees, service providers, and disclosed to third parties for the following purposes. For each of these purposes, we have set out the legal basis on which we use your personal information.

We may be required to obtain your personal information to comply with our legal requirements, to enable us to fulfil the terms of our contract with you (including your Tenancy Agreements) or in preparation of us entering into a contract with you. If you do not provide the relevant personal information to us, we may not be able to provide the Portal and the Services to you.

Where we rely on our legitimate business interests or those legitimate interests of a third party to justify the purposes for using your personal information, this will include:

- pursuit of our commercial activities and objectives, or those of a third party;
- compliance with applicable legal and regulatory obligations and any codes of conduct;
- improvement and development of our business operations and service offering, or those of a third party; or
- protection of our business, shareholders, employees and customers, or those of a third party.

4.6 Who may we disclose your personal information to?

We may share your personal information with:

- our business partners, suppliers and sub-contractors for the performance of any contract we enter into with you (for example, any property maintenance contractors or third-party payment services provider);
- our landlord (where we do not own the freehold at the rental property at which you reside), the landlord's managing agent or any letting agents;
- organisations that provide utilities to the rental property at which you reside;
- other companies and entities within the Grainger group (which we are a member of);
- any tenancy deposit scheme provider that we may use;
- our professional advisors (including accountants and lawyers) that assist us in carrying out our business activities;
- external agencies and organisations (including the police, the relevant local authority, the UK Visas and Immigration department and other law enforcement agencies) for the purpose of complying with applicable legal and regulatory obligations; and
- reference checking agencies who undertake certain checks on our behalf about you (including credit reference checks, details of any County Court Judgements entered against you, employment checks and landlord referencing) for the purpose of assessing your application. We share your name, current address, mobile number and email address for this purpose and the reference checking agency will then contact you directly to undertake such checks.

We may also disclose your personal information to other third parties, for example:

- in the event that we (or the freeholder of the rental property at which you reside, if not us) sell or buy any business or assets (including the property at which you reside), we or the freeholder (as applicable) will disclose your personal information to the prospective seller or buyer of such business or assets;
- if we or substantially all of our assets are acquired by a third party (or are subject to a reorganisation within our corporate group), personal information held by us will be one of the transferred assets; and
- if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce or apply our Portal Terms of Use.

4.7 Where will we transfer your personal information?

We will process your personal information within the United Kingdom, or other authorised territory.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to the Portal and any transmission is at your own risk. Once we have received your personal information, we will use strict procedures and security features to try to prevent unauthorised access.

5. Job applicants, current and former Grainger employees

Grainger is the data controller for the information you provide during the process unless otherwise stated. If you have any queries about the process or how we handle your information, please contact us.

5.1 Information that you provide to us includes:

- Your name, address and contact details, including email address and telephone number, date of birth and gender;
- Details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with the organisation;
- Details of your bank account and national insurance number;
- Information about your marital status, next of kin, dependants and emergency contacts;
- Information about your nationality and entitlement to work in the UK;
- Equal opportunities monitoring information including information about your ethnic origin, gender, date of birth and nationality;
- Information about medical or health conditions, including whether or not you have a disability for which the organisation needs to make reasonable adjustments;
- Evidence of entitlement to statutory leave and pay, for example, sick pay, maternity, paternity, adoption, parental and shared parental leave

This information may be provided:

- In the course of communications between you and us (including by phone, email, or otherwise).
- When you complete forms for us (including new starter paperwork, benefit or share plan membership forms etc.).
- When you update your personal details or benefit preferences.

5.2 Information that we collect about you during your employment includes:

- The terms and conditions of your employment;
- Information about your remuneration, including entitlement to benefits;
- Information about your criminal record (role dependant);
- Details of your contractual working pattern (days of work and hours);
- Details of periods of leave taken by you, including (but not limited to) annual leave, sickness absence, family leave and the reasons for such leave;
- Details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence;
- Assessments of your performance, including probationary reviews, performance reviews, details of any capability processes in which you have been involved including any warnings issued to you, performance improvement plans and related correspondence;
- Information about medical or health conditions, including whether or not you have a disability for which we need to make reasonable adjustments;
- Information about your various share plan holdings (if applicable);
- Equal opportunities monitoring information including information about your gender and nationality.

We may collect this information in a variety of ways. For example, data may be collected through CVs or resumes; obtained from your passport or other identity documents such as your driving licence; from forms completed by you at the start of or during employment (such as benefit or share plans memberships or nomination forms); from correspondence with you; or through interviews, meetings or other assessments.

5.3 Information that we collect about you from third parties includes:

- References supplied by former employers;
- Information from employment background check providers (role dependent);
- Information from criminal records checks permitted by law (role dependent);
- Medical records / occupational health reports (when required).

We collect information from third parties with your consent only.

The data we collect will be stored in a range of places, including in your personnel file, files relating to your share plans participation, in our HR management systems and in other IT systems (including the organisation's email system).

5.4 How do we use the personal information we collect about you?

Purpose	Legal Basis
To communicate with you and other individuals.	This is in our legitimate interests.
To process data to enter into an employment contract with you and to meet our obligations under your employment contract. For example, we need to process your data to provide you with an employment contract, to pay you in accordance with your employment contract and to administer benefits, pension and insurance entitlements	This is to perform a contract between you and us or in our legitimate interests.
To process data to ensure that we are complying with our legal obligations. For example, we are required to check your entitlement to work in the UK, to deduct tax, to comply with health and safety laws and to enable you to take periods of leave to which you are entitled	We do this for compliance with legal obligations to which we are subject.
Run recruitment and promotion processes	This is in our legitimate interest.
Maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency), and records of employee contractual and statutory rights;	This is in our legitimate interest.
Operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace	This is in our legitimate interests.
Operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled;	This is in our legitimate interests.
Operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to allow effective workforce management, to ensure that we comply with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled	This is in our legitimate interests.
Operate and keep a record of employee performance and related processes, to plan for career development, and for	This is in our legitimate interests.

Purpose	Legal Basis
succession planning and workforce management purposes	
To enforce or apply the agreements concerning you (including agreements between you and us)	This is in our legitimate interests.
To enforce or apply any agreements relating to share plans	This is in our legitimate interests.
Obtain occupational health advice, to ensure that we comply with duties in relation to individuals with disabilities, meet our obligations under health and safety law, and ensure that employees are receiving the pay or other benefits to which they are entitled	We do this for compliance with legal obligations to which we are subject.
Provide references on request for current or former employees	This is in our legitimate interests.
Ensure effective general HR and business administration	This is in our legitimate interests.
Respond to and defend against legal claims.	This is in our legitimate interests.
Some special categories of personal data, such as information about health or medical conditions, is processed to carry out employment law obligations (such as those in relation to employees with disabilities)	We do this for compliance with legal obligations to which we are subject.
We may process other special categories of personal data, such as information about ethnic origin for the purposes of equal opportunities monitoring	Data that we use for these purposes is collected with the express consent of employees, which can be withdrawn at any time.

5.5 Who may we disclose your personal information to?

Your information may be shared internally with members of the HR team, a recruitment panel, Payroll, your line manager, managers in the business area in which you work and IT staff if access to the data is necessary for performance of their roles;

We share your data with third parties in order to obtain pre-employment references from other employers, and where required for the role to obtain employment background checks from third-party providers and obtain necessary criminal records checks from the Disclosure and Barring Service. We may also share your data with third parties in the context of a sale of some or all of our business. In those circumstances the data will be subject to confidentiality arrangements;

We also share your data with third parties that process data on our behalf in connection with the provision of benefits, share plans and the provision of occupational health services; We also share your data with third parties that process data on our behalf in connection with the provision of benefits, administration of share plans and the provision of occupational health services;

We will not transfer your data to countries outside the European Economic Area unless appropriate safeguards are in place with the relevant supplier / processor.

5.6 How we make decisions about recruitment?

You are able to ask about decisions made about your application by speaking to your contact within our HR team or by emailing HR@graingerplc.co.uk

6. How do we protect your data?

We take the security of your data seriously. We have internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the performance of their duties.

Where we engage third parties to process personal data on our behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of this data.

7. How long do we keep data?

We will keep your personal information for as long as you are a tenant, customer or employee (including applicants) of Grainger plc.

After you stop being a tenant, customer or employee we may keep your data for up to 12 years for one of these reasons:

- To respond to any questions or complaints.
- To maintain records according to rules that apply to us.

We may keep your data for longer than 12 years if we cannot delete it for legal, regulatory or technical reasons. We may also keep it for research or statistical purposes. If we do, we will make sure that your privacy is protected and only use it for those purposes.

All retention periods are specified in our retention of records register.

8. Your rights

You have certain rights with respect to your personal information. The rights may only apply in certain circumstances and are subject to certain exemptions. Please see the table below for a summary of your rights. You can exercise these rights using the contact details below.

Summary of your rights	
Right of access to your personal information	You have the right to receive a copy of your personal information that we hold about you, subject to certain exemptions.
Right to rectify your personal information	You have the right to ask us to correct your personal information that we hold where it is incorrect or incomplete.
Right to erasure of your personal information:	You have the right to ask that your personal information be deleted in certain circumstances. For example (i) where your personal information is no longer necessary in relation to the purposes for which they were collected or otherwise used; (ii) if you withdraw your consent and there is no other legal ground for which we rely on for the continued use of your personal information; (iii) if you object to the use of your personal information (as set out below); (iv) if we have used your personal information unlawfully; or (v) if your personal information needs to be erased to comply with a legal obligation.
Right to restrict the use of your personal information	You have the right to suspend our use of your personal information in certain circumstances. For example (i) where you think your personal information is inaccurate and only for such period to enable us to verify the accuracy of your personal information; (ii) the use of your personal information is unlawful and you oppose the erasure of your personal information and request that it is suspended instead; (iii) we no longer need your personal information, but your personal information is required by you for the establishment, exercise or defence of legal claims; or (iv) you have objected to the use of your personal information and we are verifying whether our grounds for the use of your personal information override your objection.
Right to data portability	You have the right to obtain your personal information in a structured, commonly used and machine-readable format and for it to be transferred to another organisation, where it is technically feasible. The right only applies where the use of your personal information is based on your consent or for the performance of a contract, and when the use of your personal information is carried out by automated (i.e. electronic) means.
Right to object to the use of your personal information	You have the right to object to the use of your personal information in certain circumstances. For example (i) where you have grounds relating to your particular situation and we use your personal information for our legitimate interests (or those of a third party) and you consider that we should not; and (ii) if you object to the use of your personal information for direct marketing purposes.
Right to withdraw consent	You have the right to withdraw your consent at any time where we rely on consent to use your personal information.
Right to complain to the relevant data protection authority	You have the right to complain to the relevant data protection authority, which is in the case of Grainger plc, the Information

Summary of your rights

Commissioner's Office, where you think we have not used your personal information in accordance with data protection law.

9. Complaints or queries

Grainger tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of Grainger's collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the email or postal address specified below under "how to contact us".

10. Access to personal information

Grainger tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by exercising their 'right of access' under the Data Protection legislation. If we do hold information about you, we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.

You also have other rights under the UK GDPR and more information can be found on the website of the Information Commissioner's Office <https://ico.org.uk>.

To make a request to Grainger for any personal information we may hold you need to put the request in writing or email to the addresses provided below.

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

If we do hold information about you, you can ask us to correct any mistakes by, once again, contacting us using the details below.

11. Changes to this privacy notice

We keep our privacy notice under regular review. This privacy notice was updated in September 2023.

12. How to contact us

If you have any questions regarding this Privacy Policy or the way we use your personal information, you can contact us by email at enquiries@graingerplc.co.uk

or by post to

The Data Manager
Grainger plc
Citygate
Newcastle upon Tyne
NE1 4JE

You also have the right to complain to the Information Commissioner's Office. Find out on their website <https://ico.org.uk/concerns/>

13. Agreement

By continuing to engage with us you are giving us permission to process your personal data specifically for the purposes identified in this privacy notice. Where we are asking you for sensitive personal data we will always seek your consent for this and tell you why and how the information will be used.

You may withdraw consent at any time by contacting us using the details above.