

Privacy Notice

1. Introduction

- 1.1 Welcome to the privacy notice of Grace Advisory Limited (**Grace Advisory**).
- 1.2 Grace Advisory respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and during or after our contractual relationship. It tells you about your privacy rights and how the law protects you.
- 1.3 This privacy notice is available on our website. Please use the Glossary at paragraph 11 to understand the meaning of some of the terms used in this privacy notice.

2. Important information and who we are

2.1.1 Purpose of this privacy notice

- (a) This privacy notice aims to give you information on how Grace Advisory collects and processes your personal data as a result of your dealings with us, our agents and your use of our website, including any data you may provide (or a third party may provide on your behalf) when you sign up for a tenancy, shared ownership lease or enter into a business relationship with us.
- (b) Our website is not intended for children and we do not knowingly collect data relating to children on our website. Grace Advisory may process data collected from children as set out in paragraph 3.6, below.
- (c) It is important that you read this privacy notice together with any other privacy notice, privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements other notices and privacy policies and is not intended to override them.

2.1.2 Controller

- (a) Grace Advisory is the controller and responsible for your personal data (collectively referred to as Grace Advisory, **we**, **us** or **our** in this privacy notice).
- (b) We have appointed a person who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the details set out below.

2.1.3 Contact details

If you have any questions about this privacy notice or our privacy practices, please contact us in the following ways:

Full name	Grace Advisory Limited
Email address	info@gracere.co.uk
Postal address	114-118 Southampton Row, London WC 1B 5AA

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

2.1.4 Changes to the privacy notice and your duty to inform us of changes

- (a) We keep our privacy notice under regular review. This version was last updated in July 2023.
- (b) It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

3. The data we collect about you

3.1 Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

3.2 We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

3.2.1 in respect of Grace Advisory applicants:

Identity Data includes proof of your identity / photo ID, national insurance number, first name, maiden name, last name, details of anyone acting on your behalf, title, date of birth, gender, medical details (health conditions, disabilities, or vulnerabilities) of all applicants;

Contact Data includes current address, correspondence address, email address and telephone numbers;

Profile Data includes date moved to current address, language, relationship to applicant, memorable password; and

Technical Data includes the type of device you have used to access the site (including the make, model, operating system), internet protocol (IP) address and browser type, your login data and version, time zone setting

and location, browser plug-in types and versions, full Uniform Resource Locators (URL), clickstream to, through and from our site, information you viewed or searched for, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number collected via Google Analytics;

3.2.2 in respect of tenants, leaseholders and residents:

Identity Data includes first name, maiden name, last name, details of anyone acting on your behalf, title, date of birth, medical details (allergies, health conditions, disabilities, or vulnerabilities) of all tenants/leaseholders and residents;

Contact Data includes physical address of property, email address and telephone numbers, details of professional advisors (name of independent financial advisors and solicitors);

Financial Data includes bank account details, direct debit form details, savings, proof of deposit, bank statements, rent & service charges, apportionment of service charge, month rent, apportionment of rent;

Contract Data includes the date of completion, lease start and expiry date, complaints, repair raised, including detail of repairs, stage of complaints, internal notes & comments detailing the complaint, Ombudsman referrals, enforcement actions, gas safety checks, electrical cert, utilities.

3.3 Grace Advisory may collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, information about your health, and genetic and biometric data). Such data may be used, for example, to assist with benefits claims, to develop personal evacuation plans, to take measures against antisocial behaviour or to progress Court proceedings. Where we do so we will identify additional justification for using that data in accordance with Article 9 of UK GDPR, namely for (i) health or social care purposes; (ii) protection of vital interests; or (iii) substantial public interest.

3.4 Grace Advisory may operate a continuous CCTV system at our properties for the detection and prevention of crime. CCTV / sound recordings and / or use photography may be used to capture evidence of breach of tenancy, alleged anti-social behaviour or crime. For information about how long we retain CCTV for, please contact us directly.

3.5 Grace Advisory may also collect further personal data that will vary on a case by case basis to help us resolve breach of tenancy/lease, alleged anti-social behaviour or fraud. Grace Advisory may also collect other personal information that will vary on a case by case basis to help us resolve behavioural issues (including any information about criminal convictions and offences).

3.6 **Children's personal data**

- 3.6.1 Our website is not intended for children and we do not knowingly collect data relating to children on our website.
- 3.6.2 Grace Advisory may process data collected from children in respect of the following activities:
 - (a) alleged anti-social behaviour; and
 - (b) incidents / accidents and safeguarding concerns.
- 3.6.3 Grace Advisory does not normally process children's information as part of a tenancy/lease, as all tenants/leaseholders are adults. However, we record children's basic information if they are resident in one of our properties, including their name, date of birth, gender and medical details (allergies, health conditions, disabilities, or vulnerabilities). This is required for checking the property is not overcrowded and to assess other tenancy management issues where all householders, their ages and any relevant medical details are required to be known.
- 3.6.4 We may receive children's information if we are involved in the housing and tenancy aspects of a welfare case as part of a multi-agency working solution.

3.7 **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

4. **How is your personal data collected?**

4.1 We use different methods to collect data from and about you including through:

4.1.1 **Direct interactions with us**

You may give us your Identity, Contact, Financial, Profile Data by filling in forms, using our proptech platform, or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- (a) apply for a tenancy or shared ownership property;
- (b) express an interest in a shared ownership property;
- (c) request marketing to be sent to you;
- (d) enter a competition, promotion or survey; or

- (e) give us feedback, make a complaint or contact us.

4.1.2 Automated technologies or interactions

As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.

5. How we use your personal data

5.1 We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

5.1.1 where we need to perform the contract we are about to enter into or have entered into with you;

5.1.2 where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and

5.1.3 where we need to comply with a legal obligation.

5.2 Please see paragraph 11.1 to find out more about the types of lawful basis that we will rely on to process your personal data.

5.3 Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

5.4 Purposes for which we will use your personal data

5.4.1 We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

5.4.2 Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To carry out credit and reference checks	(a) Identity (b) Contact (c) Financial (d) Profile	Performance of a contract with you
To register you as a new applicant, resident, tenant, shared ownership leaseholder, supplier	(a) Identity (b) Contact	Performance of a contract with you
<p>To manage our relationship with you which will include:</p> <p>(a) Managing your tenancy including managing payments, fees and charges, collecting arrears</p> <p>(b) Notifying you about changes to our terms or privacy notice</p> <p>(c) Asking you to leave a review or take a tenant satisfaction survey and responding to any issues raised</p> <p>(d) Asking you to take part in focus groups or residents groups and managing those groups</p>	(a) Identity (b) Contact (c) Financial (d) Profile	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To share your information with potential buyers of our freehold/leasehold interest(s) in your tenancy, lease or the property in which you live if Grace Advisory decides to sell this property	(a) Identity (b) Contact (c) Financial (d) Profile	Necessary for our legitimate interests (for running our business and ensuring that transactions proceed smoothly) Necessary for your legitimate interests (to ensure a potential purchaser or assignee understands the transaction and to ensure smooth management of tenancy, lease or property following the purchase or assignment)
To share your information with our subcontractors and business partners	(a) Identity (b) Contact (c) Financial (d) Profile	Necessary for our legitimate interests (for running our business and ensuring the performance of the service of good administration for you)
To provide updates about our new homes and developments, sites, homes or events you might be interested in.	(e) Identity (f) Contact	Necessary for our legitimate interests (for running our business and ensuring the performance of the services for you)
To assess whether you qualify for shared ownership.	(a) Identity (b) Contact (c) Financial	Necessary for our legitimate interests (for running our business and ensuring the performance of the services for you)
To enter into a tenancy or contract with you.	(a) Identity (b) Contact	(a) Performance of the services for you (b) Necessary to comply with a legal obligation

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To manage the account charges and payments, including arrears.	(a) Identity (b) Contact (c) Financial	(a) The processing is necessary for the performance of our tenancy (or contract) with you. We use this basis for all processing concerning the managing of your tenancy, your account with us and your property (b) Necessary to comply with a legal obligation
To manage the repairs, maintenance and adaptations of our properties.	(a) Identity (b) Contact (c) Financial	(a) Performance of the services for you (b) Necessary for our legitimate interests (to maintain our properties) (c) Necessary to comply with a legal obligation
To ensure tenancy (or contract) conditions are complied with, such as dealing with anti-social behaviour or fraud.	(a) Identity (b) Contact (c) Financial	(a) Performance of the services for you (b) Necessary for our legitimate interests (to deal with anti-social behaviour, detecting and prosecuting fraud or otherwise ensuring that tenancy conditions are complied with) (c) Necessary to comply with a legal obligation
To check that you are eligible for a social housing property.	(a) Identity (b) Contact (c) Financial	(a) Performance of the services for you (b) Necessary for our legitimate interests (to check your eligibility) (c) Necessary to comply with a legal obligation

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To check you are able to manage a tenancy.	(a) Identity (b) Contact (c) Financial	(a) Performance of the services for you (b) Necessary for our legitimate interests (to check your suitability) (c) Necessary to comply with a legal obligation
To manage our relationships with contractors and suppliers and administer applicable contracts and service agreements	(a) Identity (b) Contact (c) Financial (d) Profile	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and administer our business)
To conduct research and statistical analysis (including website analytics) to improve our business processes and the services offered to our customers.	(a) Profile (b) Usage (c) Technical Data	(a) Performance of the services for you (b) Necessary for our legitimate interests (to improve our service offering)

5.5 Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

5.6 Promotional offers from us

5.6.1 We may use your Identity, Contact, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

5.6.2 You may receive marketing communications from us or our agents if you have requested information from us and you have not opted out of receiving that marketing.

5.8 **Opting out**

5.8.1 You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you **or** by contacting us at any time.

5.8.2 Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a tenancy, shared ownership lease, supplier/business relationship or other transactions.

5.7 **Change of purpose**

5.7.1 We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

5.7.2 If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

5.7.3 Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. **Disclosures of your personal data**

6.1 We may share your personal data with the parties set out below for the purposes set out in the table at paragraph 5.4, above:

6.1.1 External Third Parties as set out in the *Glossary* at paragraph 11.2.1;

6.1.2 Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

6.2 We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

7. **International transfers**

In the event that our External Third Parties, transfer or store personal data on servers outside of the UK we take additional steps to ensure that your information is protected to at least an equivalent level, as required by applicable data protection laws.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- 7.1.1 we will only transfer your personal data to countries that have been deemed by the Information Commissioner's Office to provide an adequate level of protection for personal data;
- 7.1.2 where we use service providers in countries that are not deemed adequate, we use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

8. **Data security**

- 8.1 We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.
- 8.2 We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. **Data retention**

9.1 **How long will you use my personal data for?**

- 9.1.1 We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.
- 9.1.2 To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.
- 9.1.3 In some circumstances you can ask us to delete your data: see paragraph 11.3.3 below for further information.
- 9.1.4 In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

10. **Your legal rights**

10.1 Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

10.1.1 request access to your personal data (see paragraph 11.3.1);

10.1.2 request correction of your personal data (see paragraph 11.3.2);

10.1.3 request erasure of your personal data (see paragraph 11.3.3);

10.1.4 object to processing of your personal data (see paragraph 11.3.4);

10.1.5 request restriction of processing your personal data (see paragraph 11.3.5);

10.1.6 request transfer of your personal data (see paragraph 11.3.6); and

10.1.7 withdraw consent (see paragraph 11.3.7).

10.2 If you wish to exercise any of the rights set out above, please contact us.

10.3 **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

10.4 **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

10.5 **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

11. **Glossary**

11.1 **Lawful Basis**

11.1.1 Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are

overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

- 11.1.2 Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- 11.1.3 Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

11.2 **Third Parties**

11.2.1 **External Third Parties**

- (a) credit and reference check companies who require access to personal data for the purposes of carrying out the relevant credit and reference check;
- (b) service providers, business partners and sub-contractors acting as processors based in the United Kingdom who provide IT and system administration services;
- (c) housing developers in respect of any properties owned by the Company or its Affiliates, developing properties for the company, its Affiliates, or any tenants acting as processors;
- (d) online real estate property companies such as Right Move and/or Zoopla acting as processors;
- (e) contractors based in the UK who provide repairs, maintenance providers, and health & safety consultants, utility companies business partners and sub-contractors acting as processors based in the UK;
- (f) website designers acting as processors based in the UK who provide their services which may require access to personal data;
- (g) professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services;
- (h) HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances; and
- (i) subcontractors acting as processors or joint controllers who we instruct in order to carry out works or services on behalf of the Company.

11.3 Your Legal Rights

You have the right to:

- 11.3.1 **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- 11.3.2 **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- 11.3.3 **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with the law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- 11.3.4 **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override this right to object.
- 11.3.5 **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - (a) if you want us to establish the data's accuracy;
 - (b) where our use of the data is unlawful but you do not want us to erase it;
 - (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; and
 - (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- 11.3.6 **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right

only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- 11.3.7 **Withdraw consent at any time** where we are relying on consent (as opposed to another lawful basis for processing (for example "legitimate interests") to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.