

# NFU MUTUAL

## TENANTS' PRIVACY POLICY

**NFU Mutual understands that the information you trust us with is important to you, and we are committed to protecting and respecting your privacy.**

**This policy explains how, when and why we collect your personal information during the course of providing services to you, under what circumstances we may disclose your personal information within our Group of Companies and to others, and how we keep it secure.**

### SUMMARY:

- We only collect personal information about you where it is completely necessary or you have consented, and we ensure that we only collect information that we need
- We will not send you marketing material
- We will not sell your personal information to third parties
- We use third party suppliers to help us provide an excellent service to you. Where we share personal information with those suppliers, we have the appropriate contracts or controls in place which will assess the security of their processing arrangements
- We will protect your personal information with an appropriate combination of technical and organisational measures

- We record and monitor our communications with you to protect you and us for the reasons listed in Section 2
- You have rights to your information. These are detailed in Section 9
- We will endeavour not to keep your personal information for longer than we have to
- If you have a complaint, please see how to contact us in Section 11
- If you have any questions about how we process your information, please see how to contact us in Section 13

### 1. WHAT INFORMATION DO WE COLLECT ABOUT YOU?

#### Residential Tenants

We will collect information about you to set up and manage your property rental. This could include:

- Name(s)
- Contact details (address, email address, phone number etc.)
- Date of birth
- Salary details
- Banking details
- Criminal history
- Visa details
- Passport/verification of identity
- Financial transactions
- References

#### Commercial Tenants

We will collect information about you to assist you in finding a property, setting up a property rental or performing ongoing property maintenance works. This could include

- Company name
- Company ownership/structure



- Directors' details, including
  - Contact details (address, email address, phone number etc)
  - Date of birth
  - Verification of identification documentation
- Financial due diligence (including credit report, sanction screening, anti-money laundering and know your customer information)
- Company banking details
- Financial transactions

## 2. WHY WE USE THE INFORMATION ABOUT YOU

To process your information we rely mainly on the following legal bases:

**Performance of a contract:** The use of your information is necessary to perform the contract that you have with us.

**Legitimate interests:** We may use your information for our legitimate interests, such as to improve our products and services, along with administrative, fraud prevention and detection and legal purposes.

**Consent:** We may rely on your consent to use your personal information in certain cases. You may withdraw your consent at any time. Please contact us using the details at the end of this policy.

## 3. HOW WILL WE USE THE INFORMATION ABOUT YOU?

### Residential Tenants

Prior to and potentially during a letting to you as a tenant at one of our properties, we will process your information in order to capture necessary information to manage the tenancy. As part of your tenancy application, we will also engage with third party screening providers to conduct background checks on you, prior to approving your tenancy agreement.

### Commercial Tenants

We will use your information to perform due diligence checks prior to entering into a contract with you. This will include engaging with third party screening providers to perform reputational background and/or credit checks. In addition we will collect publicly available Internet-based sources to assist us in our risk assessments.

We may also share your information with third party legal advisors to assist us in entering into a contract with you. If you become a tenant at one of our properties, we will process your information in order to process your rent payments and to conduct periodic tenant risk ratings.

## 4. INFORMATION THAT WE SHARE

We may have to share your information with other companies within the Group, or to the following categories of third party service providers so that we can provide a more effective service to you:

- Where required by law, we will share your information with third parties such as law enforcement agencies and regulatory or Government bodies. Failing to do so could result in fines or sanctions for NFU Mutual
- Should you enter into a contractual agreement with us, we will share your information with third party screening providers in order to conduct criminal or reputational background and credit reference checks
- We may also share your information with third party legal advisors, real estate consultants and valuers, who will provide us with professional advice regarding your tenancy and the ongoing management of the property
- We may also share your information with parties involved in a prospective disposal of the asset
- We will share your information with third party IT providers who support us in hosting, transferring, processing, testing and problem



resolving. This enables us to provide the services and products you need. We may also share information with third party audit companies providing expertise and assurance over our processes and controls

## 5. HOW WE USE CREDIT REFERENCE AGENCIES

A credit reference agency (CRA) is an independent organisation that assists insurance companies in deciding whether to offer insurance policies to potential customers, based on information gathered about them from public sources and from major lending companies.

NFU Mutual provides information to credit reference agencies and works with them to make decisions, for example, when:

- Checking details on applications for credit and credit-related or other facilities
- Managing credit and credit-related accounts or facilities
- Recovering debt
- Checking details on proposals and claims for all types of insurance
- Checking details of job applicants and employees
- Helping to detect and prevent crime, fraud and money laundering
- Checking your credit history
- Verifying your identity if you, or someone financially linked with you, applies for services. Credit checks may be remain on your record
- Tracing your whereabouts
- Undertaking research, statistical analysis and systems testing

## 6. INFORMATION SECURITY

We work hard to keep your information safe. We use an appropriate combination of technical and organisational measures to ensure, as far as reasonably possible, the confidentiality, integrity and availability of your information at all times. If you have a security-related concern, please contact us using the details provided at the end of this Policy.

## 7. INFORMATION WE COLLECT THROUGH YOUR USE OF OUR WEBSITES

We collect information through the use of cookies and similar technologies, to enable us to remember you when you visit our websites and to improve your online experience. Cookies help us understand how you use our websites, view our products and respond to our advertising, and enhance our overall product and service offering to you. When you visit one of our websites, we may record your device information including IP address, hardware and software used, general location, and when and how you interact with our websites.

To find out more about our use of cookies and related technologies, please read our Cookie Policy on our website.

## 8. DETECTING AND PREVENTING FRAUDULENT OR CRIMINAL ACTIVITY

We value the confidentiality of your personal information. However, there are some instances where we need to share your information with third parties to assist us in detecting and preventing criminal or fraudulent activities. If you require any more information about this, please contact us using the details provided at the end of this Policy.



## 9. YOUR INDIVIDUAL RIGHTS

You have a number of rights with regards to the personal information that we hold about you:

**Right of Access** – You have the right to request a copy of the information that we hold about you. We will provide you with this information within one month of receiving your request and verifying your identity. If the request is complex, we may extend the response time. We will inform you if this is the case and explain why.

**Right to Rectification** – We want to make sure that your personal information is accurate and up to date. You may ask us to correct, update or remove information you think is inaccurate or incomplete, and we ask that you inform us promptly of any changes to your circumstances.

**Right to Erasure** – You may also ask us to erase your personal information from our systems, in certain circumstances. There are some specific circumstances where the right to erasure does not apply and we are permitted to hold your information. We will explain the reason for this at the time should this occur.

**Right to Data Portability** – You may also ask us to move, or ‘port’, your personal information to another organisation electronically. We will only port personal information you have provided to us, that we have processed based on your consent or performance of a contract, or that has been processed automatically. We will port your personal information without charge and within one month, where technically feasible.

**Right to Restricting Processing** – You have a right to request that we restrict the processing of your personal information in certain circumstances. We will inform our third parties to whom we have disclosed your personal information that they must also restrict processing. We will inform you when the restriction on processing your personal information ends.

If you would like to exercise these rights please write to us, using the details provided at the end of this Policy, outlining your specific request.

## 10. RETAINING YOUR DATA

NFU Mutual, and the information we collect about you, are subject to various regulatory and legislative requirements. In addition, we will endeavour not to keep your personal information for longer than we have to for us to fulfil our obligations to you. Where it is not possible for us to delete your data, we will ensure the appropriate security and organisational measures are put in place to protect the use of your information.

## 11. COMPLAINTS

We work hard to ensure that your personal information is treated safely and securely. However, if you have a complaint, write to us using the details provided at the end of this Policy. You also have the right to complain to the Information Commissioner’s Office.

## 12. CHANGES TO OUR PRIVACY POLICY

We review our Privacy Policy regularly and will place any updates on our website and in relevant communications.

## 13. WHO TO CONTACT IN RELATION TO PROCESSING OF PERSONAL INFORMATION AT NFU MUTUAL

National Farmers Union Mutual Insurance Society Limited controls the processing of personal information on its systems. If you would like to discuss anything in relation to this Policy or how we handle your personal information, you can reach the Data Protection Officer for NFU Mutual by writing to: **Data Protection Officer, NFU Mutual, Tiddington Road, Stratford-upon-Avon, CV37 7BJ.**

**If you’d like this document in large print, braille or audio, just contact us.**

