

## **Meanwhile Creative: Our Privacy Policy**

Meanwhile Creative respects your privacy and is committed to protecting your personal data. This privacy notice informs you about how we look after your personal data when you visit our website or use our app or provide us with your data otherwise in the course of business with us. This notice tells you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format at <https://www.meanwhilecreative.co.uk/privacy-policy> so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

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## **1. Important information and who we are**

### **Purpose of this privacy notice**

This privacy notice aims to give you information on how Meanwhile Creative collects and processes your personal data through your use of this website, your use of our app and otherwise in your course of business with us.

### **Controller**

We are Meanwhile Creative Limited and we are the controller and responsible for your personal data.

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.

### **Contact details**

Meanwhile Creative Limited

privacy@meanwhilecreative.co.uk

3A, 36 King Street, Bristol BS1 4DZ

+44 117 244 3585

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

This version was last updated on 18 May 2018.

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.

### **Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **2. The data we collect about you**

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).

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

- **Identity Data** includes name, role, company/business, residential address, date of birth.
- **Contact Data** includes email address, phone number.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username or other identifier and password, your tenancies, any preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website and services.
- **Marketing Data** includes your preferences in receiving marketing from us.
- **Communications Data** includes correspondence by email or otherwise in the course of our dealings with you.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

### **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, for the tenancy). In this case, we may have to cancel the tenancy and we will notify you if this is the case at the time.

### **3. How is your personal data collected?**

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

- **Direct interactions.** You may give us your Identity, Contact, Communications and Financial Data by filling in forms on our website or app or otherwise corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - enquire about a tenancy;
  - enter into a tenancy with us;
  - request marketing to be sent to you;
  - enter a competition, promotion or survey; or
  - give us some feedback or otherwise interact with us in the course of business.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see <https://www.meanwhilecreative.co.uk/cookies-policy>
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties set out below:
  - Technical Data from the following parties:
    - (a) analytics providers such as Google based outside the EU; and
    - (b) advertising networks such as Google AdSense and Facebook pixel which may have servers based outside the EU.
  - Contact, Identity and Financial and Transaction Data from providers of technical, payment and delivery services such as Stripe which may have servers based outside the EU.

#### 4. How we use your personal data

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:

- Where we need to perform the tenancy agreement we are about to enter into or have entered into with you.
- 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.
- Where we need to comply with a legal or regulatory obligation.

See the Glossary (section 10), to find out more about the types of lawful basis that we will rely on to process your personal data.

#### Purposes for which we will use your personal data

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.

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 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.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you as a new tenant or prospective tenant	(a) Identity (b) Contact	Performance of a contract with you
To manage tenancy relationship including managing payments and fees and notifying you about changes to our terms and otherwise to communicate with you.	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Communications	Performance of a contract with you
To enable you to partake in a competition or complete a survey via website or app	(a) Identity (b) Contact (c) Profile (d) Usage (e) Communications	Necessary for our legitimate interests (to study how tenants and prospective tenants use our services, to develop them and grow our business)
To administer and protect our business and this website and app (including troubleshooting, data analysis, testing, system	(a) Identity (b) Contact	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the

maintenance, support, reporting and hosting of data)	(c) Technical	context of a business reorganisation or group restructuring exercise)
To deliver relevant website and app content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing (f) Technical	Necessary for our legitimate interests (to study how tenants use our services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website and app, our services, marketing, tenant relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of tenants for our services, to keep our website and app updated and relevant, to develop our business and to inform our marketing strategy)
To send marketing material or newsletters to you	(a) Identity (b) Contact (c) Marketing (d) Profile (e) Technical (f) Usage	Opt in, express consent.

**Marketing from us**

You will receive marketing communications or newsletters from us if you have expressly opted in to do so. You can ask us 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 any time.

**5. Disclosures of your personal data**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Service providers acting as processors which may have servers based in the US who provide IT and system administration services (such as Google Docs, Wufoo and Capsule), email management services (such as Mailchimp), debt recovery services,
- HM Revenue & Customs, regulators, councils and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances and when we need to relay information in respect of, for example, business rates tax.
- 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.

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.

## **6. International transfers**

A number of our service providers may have servers based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

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

- we use specific contracts approved by the European Commission which give personal data the same protection it has in Europe; or
- the service provider is a member of the US Privacy Shield which requires US companies to provide similar protection to personal data shared between the Europe and the US.

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

## **7. Data security**

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.

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.

## **8. Data retention**

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

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 requirements.

By law we have to keep basic information about our tenants (including Contact, Identity, Financial, Communications and Transaction Data) for seven years after they cease being tenants.

In some circumstances you can ask us to delete your data: see section 9 below for further information.

In some circumstances we may 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.

## 9. Your legal rights

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

### You also have the right in certain circumstances to:

<b>Request access to your personal data (commonly known as a "data subject access request").</b>	This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
<b>Request correction of the personal data that we hold about you.</b>	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.
<b>Request erasure of your personal data.</b>	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 local 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.
<b>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.</b>	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 your rights and freedoms.
<b>Request restriction of processing of your personal data.</b>	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; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
<b>Request the transfer of your personal data to you or to a third party.</b>	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.

### **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).

### **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.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may 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.

## **10. Glossary**

### **LAWFUL BASIS**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service 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.

**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.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

