

UPP Group Holdings Limited (**UPP**) respects your privacy and is committed to protecting your personal data. This Privacy Policy will inform you as to how we look after your personal data when you visit our website or app (www.homeathalls.com) or when you communicate us. It will tell you about your privacy rights and how the law protects you. Where we refer to “UPP”, as appropriate this includes its subsidiaries and Parent organisations.

What is covered by this policy

This policy only applies to the App, all the personal information collected by UPP from the App and collected from users when they register for the App. It does not apply to any third-party companies, individuals, organisations or other websites to which the App may link to. These third parties may have their own privacy policies. We urge you to read these carefully.

What we mean by personal information

When we refer to personal information in this policy, we mean information that can identify you as an individual or is capable of doing so. By personal information we don't mean general, statistical, aggregated or anonymous information.

It is important that the personal data we hold is accurate and current. Please inform us if your personal data changes during your relationship with us.

How to contact us or make a complaint

If you have any questions about this privacy policy or our privacy practices, please contact our Compliance Team who deal with all our privacy matters in the following ways:

Email address: gdpr@upp-ltd.com.

Postal address: 40 Gracechurch Street, London, EC3V 0BT.

Telephone number: 02073987200

Consent and updates

This policy was last updated in March 2019. Your use of the App signifies your consent to us collecting and using personal information about you in accordance with this policy.

Should we choose to change our policy for any reason, then we will make the revised policy available to you and in some cases, where appropriate, we may provide you with additional notice (such as sending you an email notification). Any changes will be effective upon posting the revised version of this policy or such later effective date as may be indicated in the policy. If we do update the policy and you do not agree to the updated policy, you shall be free to decide whether to consent to the policy or stop using the App.

You can close your App account with us at any time by revoking your consent in your profile page.

Information we may collect about you

We may collect or receive your information directly from you or from other sources. We collect the following types of information about users of the App:

- When you register to use our App, we will collect your first name, last name, and student ID. This is referred to as Identity Data.
- Your email address and phone number. This is referred to as Contact Data.
- We will also have access to your University location, block and flat relating to the space you are occupying. This is referred to as Resident Data.
- Information that you provide when you use any feature of the app in any free text field.
- Content you generate relating to events, parcels, faults, visitors, feedback and notification preferences. This is referred to as Usage Data.
- when you use the App, we may collect information about your activities, such as, device identity data, and performance related data which will be anonymised. This is referred to as Technical Data.

How we may use your information

We may use your information:

- to provide the services for which we are contracted;
- to provide the App to you;
- for communications between you and us. For example, we may send you App-related service emails (e.g., account verification, changes/updates to features of the App, technical and security notices). Note that you may not opt out of App-related service emails;
- to provide, improve, test, and monitor the effectiveness of the App;
- to develop and test new products and features for the App;
- to carry out research and analysis and monitor visitor use of our App on an anonymous basis to identify general trends and to better understand visitor behaviour, including for example, to monitor metrics such as total number of visitors to the App, traffic, and demographic patterns;
- to diagnose or fix technology problems; and
- to investigate any complaints or potential breaches of the App terms.

Other information we may collect

We may collect traffic data related to your use and access to the App, for example such data would include time spent online. We may also collect and store certain information in server logs, including but not limited to internet protocol (IP) addresses, internet service provider (ISP) details, clickstream data, browser type and language, viewed and exit pages and date or time stamps.

Purposes and legal bases for processing your personal data

The table below describes in more detail the purposes for which we use your personal data. It also identifies the relevant type of data, and the legal bases we rely on for that purpose.

Please contact us on the details above if you would like further information.

Purpose/activity	Type of data	Legal basis for processing including basis of legitimate interest
Providing accommodation services, such as handing out keys, running a reception service, operating our web portal and app, cleaning and maintaining your room, handling your post, and managing security on site.	Identity Contact Resident	To take steps necessary to perform a contract with you, or to take steps at your request prior to entering into a contract with you. Our legitimate interests: To take steps at your request in relation to others which use the accommodation, such as your family or your guests. Your consent: To use information about your health or disabilities as necessary to decide what accommodation would be suitable for you, and what adaptations you may require (we will always contact you to discuss your requirements), and to and ensure health and safety of yourself and others on site.
To comply with your enquiries and to handle complaints or claims.	Identity Contact Resident	To take steps necessary to perform a contract with you, or to take steps at your request prior to entering into a contract with you. Our legitimate interests: <ul style="list-style-type: none"> To protect the use of the accommodation by others, and in particular their health and safety while on site. Necessary to comply with our legal obligations
To deal with emergencies, such as illness or serious injuries of you or	Identity Contact	The vital interests of you, or others on site Our legitimate interests: <ul style="list-style-type: none"> To protect the use of the accommodation by others,

Purpose/activity	Type of data	Legal basis for processing including basis of legitimate interest
others.		and in particular their health and safety while on site. Necessary to comply with our legal obligations in relation to health and safety
To work with student bodies to arrange and run events and activities for our residents	Identity Contact	To take steps necessary to perform a contract with you. Our legitimate interests, and those of the student bodies: <ul style="list-style-type: none"> • To provide events and activities that promote a suitable inclusive and social environment.
To manage our business, including our relationship with you, which will include: <ol style="list-style-type: none"> Notifying you about changes to our terms or privacy policy. Asking you to update your details. Asking you to partake in a review, or a complete survey. 	Contact Resident	Performance of a contract with you. Necessary to comply with a legal obligation under the Data Protection Act 2018 that requires us to provide you with fair processing information, and to keep our records of personal data up to date and accurate. Necessary for our legitimate interests: <ul style="list-style-type: none"> • To maintain our customer relationships. • To keep our records updated. • To study how customers use our site and services. • To improve our site and service to you and make your visits to our site more rewarding
To administer and protect our business and our Site.	Identity Contact Technical Usage	Necessary for our legitimate interests: <ul style="list-style-type: none"> • To run our business efficiently, including by appointing appropriate suppliers that support our services. • To manage our IT systems, including by allowing us and our suppliers to manage network security, troubleshoot, conduct testing, perform system maintenance, provide support and generate reporting. • To keep our business secure and safe. • To prevent fraud and dishonest behaviour.

Change of purpose

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 would like to understand more about any of our purposes, please contact us on the details above. We will notify you to explain if we need to use your personal data for an unrelated purpose.

How long do we keep your information?

The periods we keep your information can vary according to the use given to the information. Unless there is a specific legal requirement to keep your information, we will not keep it for longer than necessary for the purposes for which the data was collected or for which it is to be further processed.

Disclosing your information to third parties

UPP reserves the right to access and disclose individually identifiable information to comply with applicable laws and lawful third-party requests, to operate its systems properly or to protect itself or its users. We sometimes use other companies, or systems to provide some services related to the App. These companies, or systems, can only process this information on behalf of UPP and will only be processed according with our instructions and applicable data protection legislation.

All of our contractors, suppliers and staff (including volunteers, agents, temporary workers and casual workers) who process your personal data on our behalf (and therefore act as our processors) are subject to strict contractual requirements in relation to processing personal data.

Where we are required to disclose your personal data to another organisation that acts as a controller (for example, the University, law enforcement agencies; regulators; HMRC; or as part of court proceedings), we will only do so if required by law, or if you have approved that disclosure.

We only disclose information to a third party where permitted by law, and always only as necessary to achieve a legitimate purpose. We will never share your personal data with any party for its own marketing purposes without your prior consent.

How we protect your information

UPP have strict security procedures covering the storage and disclosure of your information in order to prevent unauthorised access and to comply with our obligations under data protection and privacy legislation. This means that sometimes we may ask you for proof of identity before disclosing any personal information to you.

Cookies explained

A cookie is a piece of information that is stored on your device by your web browser, or stored as a temporary object in your web browser for the time of that connection.

When we use cookies

The UPP app uses cookies. These cookies can hold information collected during your registration and will allow us to recognise you as a user and provide you with the services you require

Our cookies help us:

- Make our site work as you'd expect
- Remember your settings during and between visits
- Improve the speed/security of the site
- Allow you to share pages with social networks like Facebook
- Continuously improve our website for you
- Make our marketing more efficient (ultimately helping us to offer the service we do at the price we do)

We do not use cookies to:

- Collect any personally identifiable information (without your express permission)
- Collect any sensitive information (without your express permission)
- Pass data to advertising networks
- Pass personally identifiable data to third parties
- Pay sales commissions

Granting us permission to use cookies

If the settings on your software that you are using to view this website (your browser) are adjusted to accept cookies we take this, and your continued use of our website, to mean that you are fine with this. Should you wish to remove or not use cookies from our site you can learn how to do this below, however doing so will likely mean that our site will not work as you would expect.

More about our Cookies

We use cookies to make our site work including:

- Remembering if you have accepted our terms of use
- Showing you, which pages you have recently visited

There is no way to prevent these cookies being set other than to not use our site.

Children's information

We do not knowingly collect or solicit any information from anyone under the age of 18 or knowingly allow such persons to register for the App. The App and its content are not directed at children under the age of 18.

Where we store your data

We do not transfer information that we collect from you to third party data processors located in countries that are outside of the European Economic Area.

Security

UPP have taken reasonable security measures to protect any personal data received from loss, misuse and alterations of customer data under our control. While we cannot guarantee that loss, misuse or alterations of data will not occur, we use our best efforts to prevent this.

Updating and accessing your information and your rights

You can update your profile information at any time by contacting us on the details above.

Accessing the relevant pages of the App. If you wish to close your account, then you can do so at any time by revoking your consent under the user profile tab which will delete your account. You can also email us on appdev@upp-ltd.com

You have the right to ask us to update and correct any out-of-date or incorrect personal information that we hold about you free of charge.

We hope you will be happy with the way we handle your information but if not you have the right to complain to the Information Commissioner if there is a problem - for more information visit www.ico.gov.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.