

Lawes Trust
Rothamsted Estate
West Common
Harpenden
Hertfordshire
AL5 2JQ



The Lawes Agricultural Trust respects your privacy and is committed to protecting your personal information. The Lawes Agricultural Trust (LAT) must look after your personal information by law. The main legislation that applies to protecting your information is:

- General Data Protection Regulations (UK) (GDPR UK)
- Data Protection Act 2018 (DPA)
- Human Rights Act 1998 (Article 8) (HRA)
- Privacy and Electronic Communications Regulations 2003 & 2011 (PECR)
- Proceeds of Crime Act 2002
- The Data Protection, Privacy and Electronic Communications (Amendments etc.) (EU Exit) Regs 2019
- Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000
- Regulation of Investigatory Powers Act 2000 (RIPA)

1. Who we are

The Lawes Agricultural Trust ("LAT"), established in 1889 by Sir John Bennet Lawes, supports Rothamsted Research's national and international agricultural scientific research through the provision of land, facilities, and funding.

LAT, a charitable trust, owns the estates at Harpenden and Broom's Barn, including many of the buildings used by Rothamsted Research.

LAT provides an annual research grant to Rothamsted Research's Institute Director, accommodation for nearly 200 people, and support for fellowships for young scientists from developing countries.

LAT also makes capital grants to help modernise facilities at Rothamsted and invests in new buildings on campus. LAT is also a shareholder in Rothamsted Enterprises Ltd (REL), providing facilities for national and international businesses in the Agri-tech sector and beyond at the Rothamsted Harpenden campus. Facilitating strong links between Rothamsted's world-leading scientific research capabilities and the commercial world, REL provides state-of-the-art conferencing facilities, flexible laboratory, and office space.

LAT is the overall **Data Controller**, and we have a legal duty to protect any information we collect from you.

We have appointed a Data Privacy Manager, Karen Taylor 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 the Data Privacy Manager at accommodation@lawestrust.org or write to Data Privacy Manager, Lawes Trust, Rothamsted Estate, West Common, Harpenden, AL5 2JQ.

2. Information covered by this Privacy Notice

This Privacy Notice covers use of personal information as defined in GDPR UK & the Data Protection Act 2018.

Personal data. This is information, or any combination of separate pieces of information, that could be used to identify you. This includes your name, address, contact details etc.

“Special category” personal data. This sensitive personal information is given more protection in law. For example, details of your health or nationality.

For more details of these definitions see below.

Personal data is any information relating to an identified or identifiable natural person “a data subject”; an identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier such as their name, alias, address, national insurance number, telephone number, email, contact information, financial information, IP address. It can include information in different formats including electronic data, hand-written notes, voice recordings, photographs, CCTV footage.

Special category personal information is personal information which reveals racial or ethnic origin, political opinions, religious/spiritual/philosophical beliefs, trade union membership, genetic or biometric data, physical or mental health data, sex life or sexual orientation data, criminal or alleged criminal offences.

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

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.

3. Where do we get personal information from?

When you enquire or apply for accommodation provided by the LAT, we may collect personal information from a variety of sources.

The majority of the personal information we collect will have been provided by you during the course of your application with us either through the electronic application form, face to face contact, by telephone, email, or electronic communication such as messaging or emails.

However, we may also obtain your personal data from other sources including:

- information provided to us by other third parties, such as your solicitor, University / Institute, Employer, Relatives.

4. What information do we collect?

We collect your personal information based on the service or services we are offering you. We will only collect the information needed. We will not sell your personal information to anyone. Some examples of information we may collect directly from you, can be found here: -

Information we may collect directly from you	Why we collect it
Your name, address, phone number, email address and your needs	To provide you with accommodation services to find a property / room for you to rent
Your marital status, date of birth, nationality, employment details	When you enter into a residential tenancy agreement
Your date of birth, nationality, and details from identity documents you provide	To perform right to rent checks, anti-money laundering and rent referencing checks (as required by law)
Your marital status, employment details, national insurance number, nationality, residential status, bank details and credit history	To carry out referencing and credit checks
Photographs of your property, an inspection report and inventory, to accurately record the condition of your property at the start or end of a tenancy	To deliver our management and letting service to you
Moving in and out dates and corresponding utility meter readings	To deliver our management and letting service to you
Your moving in and out dates, and details of the deposit paid where you are a tenant when registering or releasing any deposit from a deposit protection scheme	To fulfil our contract of service

We may request additional information from you which is relevant to the provision of specific services. If we do this, we will always tell you why the information is needed.

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 tenancy). In this case, we may not be able to provide you with accommodation.

Information we collect when you visit our website

We collect personal information in connection with your use of our website when you complete an application form, such as:

- your name, email address, telephone number, right to rent eligibility, line manager.

Third-party links

This website includes links to third-party websites and or plug-ins. 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.

Details of how we may use cookies are provided in our Cookies Policy.

Information obtained from third parties

Where we are required by law, or for legitimate business needs, we will obtain information about you from third parties, but only after we have your consent to do so. For example, the third parties we may need to contact include, employers, verify your identity and confirm your employment / visa status.

CCTV & Call recording

There is currently CCTV installed around the Rothamsted Estate for the prevention and detection of crime and to protect our business assets. For further information please ask the accommodation office.

5. How we use your information

We will process the information you provide, or we obtain from other sources to provide you with accommodation, products and services and answer any questions you may have. If you would like to see some examples of the how we use your information in the services we offer, please see below: -

The following are examples of how we use the information we collect:

Where we need to perform the contract we are about to enter into or have entered into with you.

To provide full property management and maintenance services

To carry out regulatory checks to prevent fraud, unauthorised transactions, money laundering, tax evasion etc.

To register a tenant's deposit with a deposit protection scheme

To process payments of rent, and maintenance for you if you are renting a property from us

To arrange an energy performance certificate

To do an inventory and check in/check out service for rented properties

To liaise with utility companies and local authorities regarding property services

To carry out tenant referencing and credit reference checks

To monitor and improve our products and services

Customer Surveys

We may invite you to participate in surveys from time to time to help us gather feedback on our accommodation, products, and services, to make improvements. We may use a third-party company to carry out these surveys on our behalf.

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 wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at accommodation@lawestrust.org.

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.

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. Lawful basis of processing your personal information

The LAT processes your personal information under any of the following lawful conditions:

Consent Article 6 (1)(a) GDPR - if we process information under consent, we will seek your clear and affirmative consent before processing your data, for example, to receive information of properties for rent.

Performance of a contract Article 6 (1)(b) GDPR - *this* is where the collection and processing of your data is necessary for the performance of a contract to which you are a party.

Legal obligation Article 6 (1)(c) GDPR- where the collection and processing of your personal data is necessary for compliance with a legal obligation, for example, to comply with the Data Protection Act, verify your identity, right to rent, for fraud and money laundering prevention.

Processing is necessary for the performance of a task carried out in the public interest Article 6 (1)(e) for example carrying out money laundering checks.

The lawful basis for processing “special category” personal information

The LAT processes “special category” information only when it is necessary. The lawful basis we use to process your “special category” information is:

Explicit Consent Article 9 (2)(a) GDPR – is freely given, specific and unambiguous consent before the processing of your data. For example, your nationality will be part of any right to rent checks.

You may want to inform us of your “special category” data voluntarily to enable us to offer you appropriate accommodation, products, or services. For example, you may give health information as part of a request for a particular property (e.g., you may have a health condition that means you are unable to climb stairs). We will record your needs/preferences without recording your medical/health conditions in most cases.

Children’s privacy

We do not offer any products or services to children (defined as under the age of 16 in GDPR UK). In some circumstances, for example renting a property we will require the names and age of your dependent children or other adults who may reside with you.

Third Party service providers

Where we engage third party service providers to provide products (such as Tenancy Deposit Scheme) or business services, (such as credit reference checks) we provide them with the minimum personal information needed to perform the service or provide the product we have requested. We ensure all third-party service providers understand they are required to protect your information, and not to use it for any other purpose.

If you would like to see the types of third-party organisations, we share your information with and why, please below: -

Third party	Why we share your personal information
Approved contractors / Rothamsted Facilities / IT	To appoint building maintenance contractors, to arrange EPC visits, to arrange for contractors to provide safety & statutory tests, to take inventories and or any other works for example Broadband
Surveyors	To undertake a structural survey
Solicitors	To pursue a claim for breach of tenancy agreement
Referencing Companies	To check your creditworthiness, obtain tenant references and to help prevent fraud and money laundering
Local Authority	For the payment of Council Tax
Law enforcement bodies including the police, HMRC and local Council	To comply with court orders or legal obligations
Landlord, tenant, or guarantor	To comply with our legal obligations where we are providing a lettings service
Utility Companies	For payment of utility bills
Debt collection companies	To assist us in recovering any monies which are owed
Training Providers	To provide fire and general Health and Safety Training
Deposit Protection Scheme providers	To provide a Tenancy Deposit Protection Scheme

Rothamsted	Information may be sought as to duration of accommodation required and confirmation of type of employment / engagement (i.e., student, employee, visiting worker)
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7. How long we keep your information for

We are required to keep your information for as long as is reasonably necessary to fulfil our legal and regulatory obligations. We have a Retention and Destruction Schedule to ensure we comply with the relevant legislation when processing your information.

- For lettings we keep your information for 6 years + 1 after you have stopped using our service.
- For financial records, we keep your information for 8 years if your application is successful.
- For general enquiries and marketing, we will keep your information for 2 years.
- Any copies of ID documents needed to verify your identity will be kept on file for duration of tenancy plus 1 year. For tenancy reference checks we will keep your information for 1 year.

Anonymised information on properties and geographical areas may be kept for longer to assist us with property market forecasting and trends. Anonymised information is not subject to privacy legislation or the Data Protection Act 2018 and may be kept for as long as it is needed.

8. Your statutory rights

You have a number of rights concerning the personal information we process about you. You have the right to:

- ask us *for access to a copy* of your personal information we hold about you. This is called a data subject access request. We may ask you to provide ID to verify your identity.
- ask us *to correct* your personal information if it is inaccurate. We may ask you to provide confirmation to ensure the information we hold is accurate.
- ask us *to delete* your personal information. We are unable to delete your information if the law requires us to keep it for a statutory period or there is a lawful reason, we must keep the information. We will always investigate any request and advise you if we are unable to erase your data.
- *withdraw your consent* to use your personal information. Where you have provided consent for our processing of your personal data, you may withdraw that consent at any time by simply contacting the accommodation office. We are unable to delete your information if the law requires us to keep it for a statutory period or there is a lawful reason, we must keep the information. We will always investigate any request and advise you if we are unable to erase your data.
- ask us *to restrict the use* of your personal data, we may be unable to delete your information if the law requires us to keep it for a statutory period or there is a lawful

reason, we must keep the information. We will always investigate any request and advise you if we are unable to restrict your data.

- *object to our use of your personal data for our legitimate business interests.*
- *object to an automated decision.*

Subject Access Request

If you wish to make a request for access to a copy of your personal data, or to exercise any of your other rights, please email the Privacy Data Manager at accommodation@lawestrust.org. We will endeavour to respond to and comply with your request as quickly as possible. We are aware of the statutory deadline for a subject access request; however, we will always try to send your information before the legal deadline.

Making a data subject access request

1. *We need sufficient information for us to locate your personal data. We do not have a single database and some of your information may be held in paper files.*
2. *If you are seeking information for a specific period of time or a specific issue, please tell us, as this will help us to fulfil your request and speed up our response to you.*
3. *We may need to ask you for proof of your identity. It is an offence to request the personal information relating to someone else.*
4. *There is no fee for this service.*
5. *The statutory deadline is **one month**. We may extend this deadline if your request is complex.*
6. *You will receive all the information you are legally entitled to. You will not receive information regarding third parties or other individuals. You will not receive legally privileged information.*

9. How we protect your information

We store your personal information on our electronic computer systems and in our paper filing systems.

In accordance with the law, we have strict security procedures to ensure that personal information is not damaged, destroyed, or misused, and to prevent unauthorised access to your information. We have an internal breach reporting system to record all information security incidents and breaches. Serious data breaches are reported to the ICO within 72 hours, in accordance with the GDPR UK and the Data Protection Act 2018.

10. Data Transfers

The GDPR UK applies to the UK only. GDPR UK is based on the GDPR EU which applies all countries within the EU and European Economic Area (EEA). The EU and the UK have agreed adequacy status for the continued free flow of personal data within the UK, EU, and EEA. We will ensure that there is adequate security and comparable legislation in place before sending your information to other countries outside the EEA. In accordance with the Data Protection Act 2018 and UK GDPR, if we need to transfer data outside the EEA and the country it's transferred to is not on an approved list for having adequate security controls in place, we will

limit the amount of personal data we send. We will also impose contractual obligations (standard contractual clauses) in accordance with the EDPB (European Data Protection Board) (as approved by the ICO) from the recipients to ensure the security and confidentiality of your personal data to safeguard your information.

11. Legal Information about the Lawes Agricultural Trust

- The Companies House No. for Lawes Agricultural Trust is 08901784
- The Charities Registration no. is 1156150.
- Our registered office address is Lawes Agricultural Trust, Rothamsted Estate, West Common, Harpenden, AL5 2JQ.

Updates to our Privacy Notice

We reserve the right to amend and update this Privacy Notice as required, therefore it is advisable you review this notice at regular intervals.

This Privacy Notice was last updated in June 2022.

12. Who to contact to make a complaint

If you wish to make a complaint about our compliance with data protection or GDPR please contact our Data Privacy Manager, please write to them at accommodation@lawestrust.org

We ask you to state in your complaint, the following information to enable an independent investigation: -

- Your name, contact email address and the address of the property (if regarding a tenancy, maintenance issue, or something else connected with your tenancy / enquiry)
- A description of the complaint, time period or relevant dates, and
- Please attach details if your issue relates to a letter, property description, copy of email etc.

Once we have the information above, an investigation will be carried out by the Data Privacy Manager. We aim to respond to your complaint as soon as possible, but no later than 10 days from receipt. If you remain dissatisfied following a complaint to our Data Privacy Manager, you can submit a complaint about data protection, privacy, and data sharing issues directly to the Information Commissioner's Office (ICO) at:

Information Commissioner's Office Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Website: <https://ico.org.uk/> Email: casework@ico.org.uk Telephone: 0303 123 1113