

Affinity Privacy Notice

The Affinity privacy notice provides information on how Affinity and any of its representative offices and any 3rd party providers collect, use, secure, transfer and share your information. Affinity Lettings, Property Management & Consultancy is a manager of Residential and Commercial Rental Property and Leasehold Estate Management. It operates in Bucks, Beds, Cambs, Midlands and Kent.

Identity and contact details of the data controller:

Affinity
253-255 Queensway
Bletchley, Milton Keynes
BUCKS MK2 2EH

Email info@affinity-lettings.co.uk
Tel: 01908 639098
ICO Registration No. ZA05117

It serves investor landlords, house builders, commercial businesses, local authorities, housing associations and the general public. Full details can be found on our website: www.affinity-lettings.co.uk

Contact details of the Data Protection Officer (DPO): Samantha Knight 01908 639098

Types of Information Collected

Full Name	Address	Date of Birth	Previous address
Telephone number	Email address	Dependants names	Dependants age
Gender	Income Details	Bank Statements	Payslips
Landlord Details	Nationality	Photo I.D	Employer Details
Nationality	Bank Details	Accountant Details	Property Preferences

Methods of collection

Methods of collection are in the general conduct of business. Affinity collects information relevant to the services being sought, from:

- Yourself
- Next of kin
- Spouse / partner / family member
- Employers
- Credit / Default Agencies
- Trusted sources including: Local Authority/Government / Land / Police registers

Such information will generally be collected directly via the use of any of our standard forms, over the internet, via email, in our office, at a rental property or through a telephone conversation with you. We may also collect personal information through our affiliates or suppliers.

In addition, you may choose to submit information directly to us via several methods, including: in response to marketing or other communications, through social media, by signing up for a product or service, through participation in an offer, program or promotion, in connection with an actual or potential business or employment relationship with us

You may also agree to third parties disclosing information about you to us that those third parties have collected.

We, our service providers and partners collect certain information by using automated means, such as cookies and web beacons, when you interact with our advertisements, mobile applications, or visit our websites, pages or other digital assets. The information we collect in this manner may include: IP address, browser type, operating system, referring URLs and information on actions taken or interaction with our digital assets.

We may use third-party web analytics services on our websites and mobile apps the analytics providers that administer these services use technologies such as cookies and web beacons to help us analyse how visitors use our websites and apps.

"Your Rights and Choices" section of this Privacy Notice specifies your ability, to opt out or limit the usage of the information collected.

Purposes of collection

Generally, we will collect, use and hold your information for the purposes of:

- Assessing an applicant's suitability for a tenancy, lease or license
- Notifying Utility suppliers of the responsible party for the bill
- Access to the rental/lease/licensed dwelling/unit to conduct repairs, maintenance and other requirements in line with the contract
- Process payments / transactions
- Accounting, Credit Checks and to protect against and prevent fraud and money laundering
- Provide, administer and communicate with you in line with Affinity products, services, offers, programs and promotions
- Compile business directories, including business contact information
- Operate, monitor, evaluate and improve our products, services, websites, mobile applications, other digital assets and business.
- Managing communications, assess effectiveness and optimisation of advertising
- Functionality of our websites, mobile applications other digital assets
- Comply with industry standards

We reserve the right to employ third party electronic verification for the purpose of verifying identity. This search will not affect your credit rating

Lawful basis of processing personal data

Personal data is processed in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Depending on the activity, we rely on the following lawful bases:

- **Performance of a contract** – where processing is necessary to deliver services or meet contractual obligations, including obligations involving TransUnion.
- **Legal obligation** – where processing is required to comply with applicable laws, regulatory requirements, or statutory obligations.
- **Legitimate interests** – where processing is necessary for legitimate business purposes such as system security, fraud prevention, risk management, audit, and compliance, and where such interests do not override the rights and freedoms of individuals.
- **Consent** – where required by law, and where individuals have been provided with a clear choice and the ability to withdraw consent at any time.

Where legitimate interests are relied upon, appropriate assessments are conducted to ensure that the rights and freedoms of data subjects are protected.

The legitimate interests pursued by the controller (if processing is based on legitimate interests).

Our legitimate interests include operating our business, fulfilling contractual obligations, ensuring system and data security, preventing fraud, supporting audit and compliance activities, and protecting TransUnion data. These interests are balanced against the rights and freedoms of individuals, with appropriate safeguards in place.

Details of any international data transfers outside the UK/EU and the safeguards in place.

We may transfer personal data to recipients or service providers located outside the UK and/or European Economic Area (EEA).

Where such transfers take place, we ensure appropriate safeguards are in place to protect personal data in accordance with applicable data protection laws. These safeguards may include the use of approved standard contractual clauses, international data transfer agreements, or transfers to countries that have been recognised as providing an adequate level of data protection.

Information we share

We do not sell or otherwise disclose personal information we collect about you, except as described in this Privacy Notice or as indicated via the consent process at the time the data is collected. We share the information we collect with, but not limited to:

- Vetted affiliates and partners
- Formally contracted service providers to perform services on our behalf. *We contractually require these service providers to safeguard the privacy and security of personal information they process on our behalf and authorise them to use or disclose the information only as necessary to perform services on our behalf or comply with legal requirements*
- Councils, health and care providers
- Credit agencies, Land Registry Office, Her Majesty's Revenue and Customs (HMRC) and other relevant regulatory bodies
- Utility companies for correct billing
- Additionally, we may share information about you, if required legally, to prevent harm or financial / reputation loss, for investigation of suspected or actual fraudulent or illegal activities.
- Perspective landlords requesting references via your written consent

On websites, features can be accessed where we partner with other entities that are not affiliated with Affinity. These include social networking, geo-location tools etc. are operated by third parties (indicated appropriately) who may use or share personal information in accordance with their own privacy policies. It is recommended that you review the third parties' privacy policies if you use the relevant features.

Affinity reserve the right to transfer your information in the event of a sale or transfer (wholly or partially) of our business or assets, with reasonable efforts for the acquirer protect / use your information consistent with our Privacy Notice. You can exercise your rights to contact the acquiring entity with questions concerning the protection and processing of your information.

Credit Reference and Affordability Checks

To help us assess applications, prevent fraud, and meet our legal and regulatory obligations, we may obtain information about you from credit reference agencies (CRAs).

We obtain this information via **Creditsafe**, which uses its data partner **TransUnion** to supply consumer credit and identity data.

- **Creditsafe Business Solutions Limited** is authorised and regulated by the Financial Conduct Authority
FCA Firm Reference Number: **742313**
- **TransUnion International UK Limited** is authorised and regulated by the Financial Conduct Authority
FCA Firm Reference Number: **805757**

The information we receive may include data relating to your identity, credit commitments, payment history, and public record information. This data is used solely for legitimate business purposes, including creditworthiness assessment, identity verification, and fraud prevention, in accordance with applicable data protection laws.

Further information about how Creditsafe and TransUnion process your personal data can be found in their respective privacy notices:

- **Creditsafe Privacy / Transparency Notice:**
[Transparency Notice / Customers & Suppliers](#)
- **TransUnion CRAIN (Credit Reference Agency Information Notice):**
<https://www.transunion.co.uk/legal/privacy-centre/pc-credit-reference>
- **TransUnion Bureau Privacy Notice:**
<https://www.transunion.co.uk/legal/privacy-centre/pc-bureau>

How long do we keep information for ?

We will keep information for a reasonable amount of time in order to perform the purposes listed above.

We keep personal data only for as long as necessary for its purpose and to meet legal or regulatory obligations. Data used for credit reference or affordability checks is retained only for as long as required and then securely deleted. However Affinity reserves the right to keep information for longer if we feel that this is in the legitimate interests of Affinity but for no longer than 7 years

Your rights and choices

Your rights regarding the sensitive / personal information we maintain about you enable you to exercise choices about what personal information we collect from you, how we use that information, and how we communicate with you.

Access and Correction

You may have the right to:

- Obtain confirmation that we hold personal information about you
- Request access to and receive information about the personal information we maintain about you
- Receive copies of the personal information we maintain about you

The right to access personal information may be limited in some circumstances by local law requirements. To exercise these rights, please contact us in writing at our address above.

The rights of data subjects, including

- a. Right of access
- b. Right to rectification
- c. Right to erasure (“right to be forgotten”)
- d. Right to restrict processing.
- e. Right to data portability
- f. Right to object

Under UK data protection law, you have the following rights in relation to your personal data:

- Right of access – You have the right to request a copy of the personal data we hold about you and information about how it is used.
- Right to rectification – You have the right to request that inaccurate or incomplete personal data is corrected.
- Right to erasure (“right to be forgotten”) – You have the right to request that we delete your personal data where there is no lawful reason for us to continue processing it.
- Right to restrict processing – You have the right to request that we limit how we use your personal data in certain circumstances.
- Right to data portability – You have the right to receive your personal data in a structured, commonly used, and machine readable format, and to request that we transfer it to another organisation where technically feasible, readable format, and to request that we transfer it to another organisation where technically feasible.
- Right to object – You have the right to object to the processing of your personal data where we rely on legitimate interests or where data is used for direct marketing.

Update and correct inaccuracies in your personal information

If you feel that the information we hold about you is incorrect or inaccurate you can contact us outlining the information you feel is incorrect or inaccurate

If we refuse to correct your personal information, we will provide you with a written notice that sets out the reasons for our refusal (unless it would be unreasonable to provide those reasons) and provide you with a statement regarding the mechanisms available to you to make a complaint.

Object to the processing of your personal information

If you would like to object to any processing of your information by Affinity you can contact us in writing outlining what you would like to object to.

Have the information blocked, anonymised or deleted

If you would like Affinity to delete, block or anonymise information we hold about you, you can contact us outlining what information you would like deleted, blocked or anonymised.

To update your preferences, ask us to remove your information from our mailing lists or submit a request to access, update, correct or delete your personal information, please contact us as specified in the “How To Contact Us” section below.

Opting out of processing

You can opt out of collection of personal information by automated means e.g. when visiting our website or visit third-party websites and interact with our adverts, by using the Cookie Consent tool displayed in the website (the browser you use may provide options on how to opt out of receiving certain types of cookies). However without cookies you may not be able to use all of the website features and/or online services.

Affinity operate a cookie policy

Some of our service providers and partners may collect information about your online activities over time and across third-party websites to customise and target our adverts. You can at any time tell us not to send you marketing communications by e-mail or by contacting Affinity as indicated below.

Withdrawal of consent

If we obtain your information by consent you have the right to withdraw any consent you previously provided to us.

If we process your information under legitimate interest you can object at any time on legitimate grounds, to the processing of your personal information. The right to consent removal may be limited in some circumstances by local law requirements and you will be informed appropriately.

How we protect personal information

The security of your personal information is very important and Affinity is committed to protecting the information we collect. We maintain administrative, technical and physical safeguards designed to protect the personal information you provide or we collect against accidental, unlawful or unauthorised destruction, loss, alteration, access, disclosure or use.

We take measures to destroy or permanently de-identify personal information if required by law or if the personal information is no longer required for the purpose for which we collected it.

Provision of Personal Data

Is the provision of personal data statutory or contractual?

The provision of certain personal data is primarily contractual and, in some circumstances, required to meet legal and regulatory obligations.

Personal data is required to:

- enter into and perform contracts with customers, suppliers, or business partners.
- process orders, manage accounts, and deliver goods and services.
- verify identity and prevent fraud; and
- comply with applicable legal, regulatory, accounting, and tax obligations.

What are the consequences of not providing personal data?

If you choose not to provide the personal data, we request:

- we may be unable to enter into a contract with you.
- we may be unable to fulfil orders, supply goods, or provide services.
- we may be unable to conduct necessary verification, compliance, or fraud prevention checks; and
- as a result, our services may be delayed, restricted, or declined.

Where personal data is requested for optional purposes, such as marketing communications, providing this data is not mandatory, and you may withdraw your consent at any time without affecting your ability to receive goods or services from us.

Non-Automated Decision Making and Profiling Making and Profiling Making and Profiling

We may use automated systems and tools to support certain business processes, such as risk assessment, fraud prevention, affordability checks, identity verification, or record management.

These tools may analyse personal data using predefined criteria or rules to generate indicators, scores, or recommendations. However, we do not make decisions that have a legal or similarly significant effect on individuals based solely on automated processing. Any such decisions are subject to meaningful human review.

The use of these tools may influence the speed or level of review applied to an application or request, but individuals will not be subject to automatic rejection or adverse decisions without human involvement.

Clarity, accessibility, and transparency

We are committed to being transparent about how we collect, use, and protect personal data.

The information provided in this Privacy Policy is written in clear, plain language and is intended to be easy to understand.

We aim to ensure that information about our data processing activities is concise, accessible, and available in an appropriate format so that individuals can easily understand how their personal data is used and what rights they have.

If any part of this Privacy Policy is unclear or if you require further explanation, you may contact us using the details provided and we will be happy to assist.

How to Contact Us / Complaints and Feedback

If you would like to make a complaint about a breach of your personal information, applicable privacy laws / principles or a concern about Affinity privacy practices, would like access and/or update information or preferences you provided to us, please e-mail us at: info@affinity-lettings.co.uk or write to us at the address above.

To assist us in responding to your request, please give full details of the issue. We attempt to review and respond to all complaints within a reasonable time. If we cannot for lawful reasons complete your request we will explain this to you to the extent that we lawfully can.

You have the right to complain to the UK Information Commissioner's Office (ICO) or another relevant data protection authority if you are dissatisfied with how we manage your personal data.

Updating this privacy statement

We will update this statement from time to time so we suggest that you review this statement at regular intervals via our website. Where we undergo substantial changes to our privacy statement we will endeavour to inform you directly about these changes.

APRIL 2026