

PRIVACY NOTICE – ACCOMMODATION SERVICES

The purpose of this notice is to explain how Falmouth Exeter Plus (“FX Plus”) Accommodation Services will collect and process your personal data. This notice also tells you which third parties we may share your personal data with.

FX Plus is a data controller and will only process your personal data in accordance with the current data protection legislation. We shall process your personal data in accordance with the General Data Protection Regulation (or GDPR for short), and in accordance with the Data Protection Act (2018) (or DPA for short)

The Data Protection Officer for FX Plus is Jonathan Hocking, who can be contacted by:

Email: dataprotection@fxplus.ac.uk

Telephone: 01326 259431

Writing:

Data Protection Officer
Falmouth Exeter Plus
Penryn Campus
Treliever Road
Penryn
Cornwall
TR10 9FE

This notice will be reviewed annually to ensure continued compliance with current data protection legislation and to reflect best practice.

By applying for university owned, managed or approved accommodation, you agree to FX Plus processing your personal data (including sensitive personal data), for the purposes and in the manner set out in this notice and for other legitimate purposes connected with the application and offer process and your accommodation agreement.

What information is being processed about you

The type of personal data and sensitive personal data we may process about you consists of:

- Your full name and your student number
- Student photograph
- Your home address and your contact details including email and telephone number
- Your date of birth
- Your nationality and your ethnic origin
- Your gender
- Your course name
- Details regarding your guarantor
- Any disability or other medical information that has been provided to FX Plus

How and why your information is processed

Your personal data is processed by FX Plus for the purpose of managing your application for accommodation and to fulfil its contractual obligations to you in the provision of your accommodation. It may also be collected to fulfil legal obligations and/or regulatory duties that it owes to its regulators and to other third parties.

Accommodation Services collects your personal data from the following sources:

- Personal details from the Falmouth University or University of Exeter Student Record System.
- The information contained on your Room Service application form.
- Information provided by you during the application process and whilst a resident in the accommodation.

How your personal data will be used

Here are some of the ways we will use your personal data. This list is not exhaustive, but is intended to provide you with an idea of the things that we may need to do, to manage the application and offer process and your provision of accommodation. We will not use your data for any purpose other than those listed and for maintaining your accommodation records and/or protecting your wellbeing.

- Administration of the application and allocation process. Allocations factor personal details to endeavor to meet the preferences and medical needs stated on your application.
- For the purpose of room moves or contract changes to another residence or room type e.g. moving from a shared room to single occupancy.
- Management of the move in process for arrivals. Personal data is used for verification of identity for room keys packs and arrival slots.
- Management of health and safety in halls. The medical information disclosed is processed by Accommodation Services to support your medical needs, including accessibility requirements such as adaptations and personal emergency evacuation plans.

This processing is necessary for:

- The performance of the contract between you and FX Plus for the provision of your accommodation.
- FX Plus's compliance with any statutory obligations; and/or to protect the interests of the data subject or another person.

Sensitive Personal Data

Some of the personal data FX Plus processes about you will be "sensitive personal data". This category of personal data will be subject to additional protections. Sensitive personal data for example is information about your racial or ethnic origin, religious or

similar beliefs, physical or mental health or condition. This information is processed for some of the reasons set out above.

Who your personal data is shared with

Information concerning your physical or mental health will be disclosed to the FX Plus Student Services - Living Support and Accessibility teams and to the Night Services team so that a proper level of facilities and support may be provided, this includes out of hours support. This personal data will only be sent to people who need to know this information to support you.

In processing your personal data and/or sensitive personal data, FX Plus may have reason to share this data with a third party:

- In exceptional circumstances where we are concerned about your safety/wellbeing or if we consider you to be a risk to yourself or others we may share limited information both internally and with relevant third parties (for example Ambulance, Police, NHS Trusts etc.) to ensure appropriate support is available.
- Your accommodation payments will be made through our financial service provider, Falmouth University Finance Department.
- Should you fall into arrears of payment of your accommodation fees, we may disclose your personal data to a third party (e.g. solicitors, debt recovery agents and Courts) to help pursue and recover the debt.
- We will disclose details of full-time registered students to the relevant Council if requested so that liability for Council Tax may be established.
- If you are allocated to a nominated accommodation provider such as The Sidings (CRM Students) or Maritime Studios (Hello Students) your personal details on your application will be shared with the property management companies to enable an offer of accommodation. The accommodation contract will be directly between you and CRM Students or Hello Student.
- Personal details will be shared with service providers who help with the administration and operational day-to-day running of the Halls of Residence e.g. site supervisors at Tuke House and Treiske Halls (Sanctuary Students).

What happens with your personal data

On departure of your accommodation at the end of your accommodation agreement, FX Plus will retain your personal details and accommodation record for a period of five years. This data is retained in order to provide a record of your accommodation offer and period and also to allow FX Plus to pursue debt recovery if required.

If you apply for accommodation but do not accept an offer of accommodation we will retain your personal details provided on the application as a record of the rejection/withdrawal of your offer. The data will be retained while you are registered as a student with Falmouth University or University of Exeter. Your personal data will not be shared elsewhere in this instance.

Some information may be retained for statistical purposes. This information will not contain information that will identify any individuals.

Our reasons for processing your data

What we do	Our legal basis under GDPR
Deliver our service to you with regards to accommodation during your student life with Falmouth University or the University of Exeter	Article 6(1)(b) – this is necessary for the performance of our contract with you Article 6(1)(f) – this is necessary for our legitimate interests.
Contact you with regard to your accommodation	Article 6(1)(b) – this is necessary for the performance of our contract with you. Article 6(1)(f) – this is necessary for our legitimate interests.
Share your details with other FX Plus teams to ensure the safety and wellbeing of you and other accommodation residents	Article 6(1)(f) – this is necessary for our legitimate interests

Your Rights

You are in complete control. You can object to the use of your personal data at any time. Though in some cases we may not be able to provide your requested service where the information processing is an integral part of the service, and in some cases we may not be able to stop processing your data as there is a legal basis for processing that we are meeting. We will tell you if this is likely to be the case.

Subject to some legal exceptions, you have the right to:

- request a copy of the personal information FX Plus Accommodation Services holds about you;
- to have any inaccuracies corrected;
- to have your personal data erased (if you have consented to your data being used);
- to place a restriction on our processing of your data;
- to object to processing; and
- to request your data to be ported (data portability).

To learn more about these rights please see the [ICO website](#).

Please address any such requests to the FX Plus Data Protection Officer.

What can you do if you are unhappy with the way your data is being processed

FX Plus is transparent about its processing of your personal data. However, should you have any queries about how FX Plus processes your personal data; you should contact our Data Protection Officer.

If you think that any of your personal data held by FX Plus is incorrect (for example if you change your contact details), please let us know so that we can update our records accordingly.

You have the right to complain to the Information Commissioner (<https://ico.org.uk>) if you are not satisfied with the handling of your personal data by FX Plus.

The Information Commissioner's Office can be contacted at the following address:

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