



LET-BUY-INVEST PROPERTIES

Data Protection & GDPR Policy

Effective Date: 01/07/2026 | Version: 1.0 | Policy Owner: LBI-JN

© 2026 Let-Buy-Invest Properties Ltd. All rights reserved. This document is confidential and proprietary to Let-Buy-Invest Properties Ltd. No part of it may be copied, reproduced, distributed, or transmitted in any form without prior written permission.

1. Purpose

Let-Buy-Invest Properties ("the Company", "we", "us", "our") is committed to protecting the personal data of our tenants, landlords, clients, employees, and any other individuals we deal with. This policy sets out how we collect, use, store, share, and protect personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, and explains the rights individuals have over their own data.

2. Scope

This policy applies to all personal data processed by the Company, in any format, including data relating to tenants, landlords, temporary accommodation clients placed with us by local authorities, prospective tenants, contractors, employees, and website or enquiry contacts. It applies to all staff, directors, and anyone processing personal data on our behalf.

3. The Data Protection Principles

We process personal data in line with the six data protection principles set out in UK GDPR. Personal data must be:

- Processed lawfully, fairly, and in a transparent manner
- Collected for specified, explicit, and legitimate purposes, and not processed in a way incompatible with those purposes
- Adequate, relevant, and limited to what is necessary (data minimisation)
- Accurate and, where necessary, kept up to date
- Kept for no longer than necessary (storage limitation)
- Processed securely, protecting against unauthorised or unlawful processing, loss, damage, or destruction (integrity and confidentiality)

We are also accountable for demonstrating compliance with these principles, which this policy, along with our internal records of processing, supports.

4. Roles and Responsibilities

- Let-Buy-Invest Properties Ltd is the Data Controller for personal data processed in relation to our lettings, sales, and temporary accommodation management services
- Our designated Data Protection Lead is responsible for overseeing this policy, advising on data protection matters, and acting as the main point of contact for data protection queries and requests
- All staff are responsible for handling personal data in line with this policy and completing any data protection training provided to them
- Directors and Senior Managers are responsible for ensuring adequate resources and processes are in place to support compliance

5. What Personal Data We Collect

Depending on our relationship with you, we may collect and process the following categories of personal data:

- Identity data — name, date of birth, photographic ID, right to rent documentation
- Contact data — address, email address, telephone number
- Financial data — income, bank details, rent payment history, references
- Tenancy and placement data — tenancy agreements, correspondence, inspection and inventory reports, complaints, and ASB records
- Special category data — such as health information or details of vulnerabilities, where relevant to a placement, a repair, or a safeguarding concern, and only where necessary
- Technical data — such as IP address and browsing data, where you use our website

We only collect data that is necessary for the purpose it is being collected for.

6. Our Lawful Basis for Processing

We rely on the following lawful bases, depending on the purpose of processing:

- Contract — where processing is necessary to perform a tenancy agreement or provide our services to you
- Legal obligation — where we must process data to comply with the law, for example Right to Rent checks, gas safety records, or anti-money laundering checks
- Legitimate interests — where processing is necessary for our legitimate business interests, such as managing our properties and services, provided this does not override your rights and interests
- Consent — where we ask for your specific consent, for example for certain marketing communications, which you may withdraw at any time
- Vital interests — in rare cases, to protect someone's life or immediate wellbeing, for example in a safeguarding emergency

Where we process special category data (such as health information), we will also identify a specific condition permitting this under Article 9 UK GDPR, such as it being necessary for reasons of substantial public interest, or with your explicit consent.

7. How We Share Your Data

We only share personal data where necessary, and with organisations who have a legitimate need to receive it, including:

- Local authorities, where you have been placed with us as temporary accommodation, or where we have statutory or contractual reporting obligations to them
- Contractors and tradespeople carrying out repairs or maintenance at your property
- Deposit protection schemes and redress schemes, such as the Property Redress Scheme
- Reference and credit checking agencies, and right to rent verification services
- Utility companies and local councils, where relevant to setting up or transferring accounts
- Professional advisers, such as solicitors, accountants, or insurers
- Regulators, law enforcement, or the courts, where required by law

We do not sell personal data to third parties. Where a third party processes data on our behalf (a data processor), we have a written contract in place requiring them to protect that data to the same standard as we do.

8. Data Retention

We keep personal data only for as long as necessary for the purposes it was collected for, and in line with legal and regulatory requirements. Typical retention periods are set out below; some records may be kept for longer where required by law or an ongoing dispute.

Type of Record	Typical Retention Period
Tenancy and placement records	6 years after the tenancy or placement ends
Right to Rent check records	For the duration of the tenancy, and for 1 year after it ends, in line with Home Office guidance
Financial and accounting records	6 years, in line with HMRC requirements
Complaints and ASB records	6 years after the matter is closed
Recruitment records (unsuccessful candidates)	6 months after the recruitment process ends
Employee records	6 years after employment ends
CCTV footage (where in use)	Typically 30 days, unless required for an ongoing investigation

9. Data Security

We take appropriate technical and organisational measures to protect personal data against unauthorised access, loss, damage, or disclosure, including:

- Restricting access to personal data to staff who need it to carry out their role
- Using secure, password-protected systems, with access controls and regular password changes
- Storing physical documents containing personal data securely, with restricted access
- Encrypting sensitive data where appropriate, both in transit and at rest
- Providing data protection training to staff and requiring compliance with this policy
- Requiring data processors we work with to have appropriate security measures in place

10. Your Rights

Under UK GDPR, individuals have the following rights in relation to their personal data:

Right	What It Means
Right to be informed	To know how and why your data is used — set out in this policy and any privacy notice we provide
Right of access	To request a copy of the personal data we hold about you
Right to rectification	To have inaccurate or incomplete data corrected
Right to erasure	To request deletion of your data in certain circumstances
Right to restrict processing	To limit how we use your data in certain circumstances
Right to data portability	To receive your data in a portable format, where processing is based on consent or contract and carried out by automated means
Right to object	To object to processing based on legitimate interests, or to direct marketing at any time
Rights related to automated decision-making	To not be subject to a decision based solely on automated processing that has a significant effect on you

To exercise any of these rights, please contact us using the details in Section 14. We will normally respond within one month of receiving a valid request. Some rights are not absolute and may not apply in every circumstance — where this is the case, we will explain why.

11. Data Breaches

We take data security incidents seriously. If a personal data breach occurs, we will investigate promptly, take steps to contain and remedy it, and assess whether it is likely to result in a risk to individuals' rights and freedoms. Where required, we will report the breach to the Information Commissioner's Office (ICO) within 72 hours of becoming aware of it, and will notify affected individuals without undue delay where the breach is likely to result in a high risk to them. All staff are required to report any suspected data breach to the Data Protection Lead immediately.

12. International Data Transfers

Where personal data is transferred outside the UK — for example, where we use a service provider based overseas — we will ensure appropriate safeguards are in place, such as an adequacy decision, UK International Data Transfer Agreement, or standard contractual clauses, to ensure your data continues to receive an equivalent level of protection.

13. Marketing Communications

Where we send marketing communications by email or text, we do so in line with the Privacy and Electronic Communications Regulations (PECR) and UK GDPR, and only where we have a lawful basis to do so. You can opt out of marketing communications at any time by contacting us or using the unsubscribe link provided.

14. Contact Us and Complaints

If you have any questions about this policy, wish to exercise any of your data protection rights, or want to raise a concern about how we handle your data, please contact:

- Data Protection Lead: Jelena Nasi
- Email: jelena.nasi@let-buy-invest.co.uk
- Telephone: 0800 158 3548 (24 hours)
- Address: 200b Mitcham Road, CR0 3JG
- Website: www.let-buy-invest.co.uk

If you remain unhappy with our response, you have the right to complain to the Information Commissioner's Office (ICO):

- Website: www.ico.org.uk
- Telephone: 0303 123 1113

15. Policy Review

This policy will be reviewed at least annually, or sooner if required by changes in data protection law, regulatory guidance, or our own processing activities, to ensure it remains effective and compliant.

Approved by: JN Date: 01/07/2026 Next Review Date: 01/07/2027