

RentWallet Privacy Policy and Cookies

1. About this Policy

- 1.1. This Privacy Policy and Cookies ("**Privacy Policy**") explains what information Rentwallet.net Limited ("**we**", "**our**", "**us**", "**RentWallet**") will collect about you ("**Personal Data**"), the purpose and legal basis for that processing and the circumstances where it could be provided to third parties. We are acting as a controller under the Data Protection Act 2018 ("**DPA**") in relation to the Service, except to the extent we are acting as an agent of Moneyhub Financial Technology Limited ("**Moneyhub**") for the provision of the Payment Services, in which case Moneyhub's privacy policy and cookies applies which can be found at <https://www.moneyhub.com/privacy-policy-and-cookies>.
- 1.2. Capitalised terms used in this Privacy Policy that are not otherwise defined where they first appear shall have the meaning given to them in the RentWallet Service Terms of which this Privacy Policy forms part ("**Service Terms**"), or the DPA. The corporate information about us and Moneyhub are in Clause 2 of the Service Terms.
- 1.3. The Service Terms and this Privacy Policy determine our responsibilities under the DPA to protect your personal data provided to us via the Service. Please read this Privacy Policy and Moneyhub's privacy policy and cookies carefully as they contain important information about the use of your personal data.
- 1.4. If you have any queries about this Privacy Policy or how we use your Personal Data, please contact us at connected@rentwallet.net.
- 1.5. You may also complain to the Information Commissioner's Office if you consider there has been a breach of the DPA in connection with your Personal Data.
- 1.6. We aim to keep your personal data up-to-date, so please advise us of any changes by e-mailing connected@rentwallet.net or by updating the Service promptly if there is any change in your name, residential address, telephone number, e-mail address or any other details that are important for our dealings with you in relation to the Service.

2. Collection, purpose and legal basis for Processing

We may collect and process the Personal Data for the purposes, and on the legal basis, specified in specified in Annex A to this Privacy Policy. Moneyhub's privacy policy and cookies explains this in relation to the Payment Services.

3. Sharing of information with third parties

We may need to share information about you with certain service providers, who help us to deliver the Service to you, such as third party technology companies who may provide elements of the Service functionality, and our group of companies ("**Third Party Service Providers**"). We only disclose Personal Data to Third Party Service Providers for the purposes explained in Annex A to this Policy.

4. Storing your Personal Data

- 4.1. The Personal Data described in Annex A of this Privacy Policy is stored in the United Kingdom ("**UK**"). We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.
- 4.2. Once we have received your information, we will use appropriate technical and organisational measures and procedures to protect your personal data from unauthorised or unlawful processing and against accidental loss, destruction or damage. We use encryption technology to reduce the risk of your data being accessed by unauthorised persons via the Service, but as the Internet and mobile networks are not completely secure we cannot guarantee the security of your Personal Data while it is being transmitted to or from us, so any transmission is at your own risk.
- 4.3. Your Personal Data will be stored for the duration of the Service Terms and for such time thereafter as required by Applicable Law or the limitation period for bringing contractual claims under or in relation to the Service Terms.

5. Processing of personal data not provided to us by you

- 5.1. As required by Applicable Law, we will also check your identity and other personal details with a fraud prevention agency/agencies and credit reference agencies. If you give false or inaccurate information and we identify fraud, this will be recorded and may be shared by those agencies with other organisations, so that we and those other organisations, including law enforcement agencies and debt collection agencies, may access, use and search these records to:
 - (a) help make decisions about credit and credit related services, for you and members of your household;
 - (b) help make decisions on motor, household, credit, life and other insurance proposals and insurance claims, for you and members of your household;

- (c) trace debtors, recover debt, prevent fraud, and to manage your accounts or insurance policies;
 - (d) prevent fraud and money laundering, for example, when:
 - Checking details on applications for credit and credit related or other facilities;
 - Managing credit and credit related accounts or facilities;
 - Checking details on proposals and claims for all types of insurance; and
 - Checking details of job applicants and employees.
- 5.2. More information about credit reference agencies, their role as fraud prevention agencies, the data they hold, for how long, your rights and how they use personal data is available at the following links to each agency's Credit Reference Agency Information Notice:
- Call Credit at www.callcredit.co.uk/crain
- Equifax at www.equifax.co.uk/crain
- Experian at www.experian.co.uk/crain

6. Cookies and how we use them

- 6.1. A cookie is a small text file of letters and numbers that we store on your browser or digital device. Cookies send information back to the originating website on each subsequent visit, or to another website which recognises that cookie.
- 6.2. Generally, there are four types of cookies:
- Necessary cookies, required for the operation of the Service. They enable you to log into secure accounts and use interactive features, for example.
 - Analytical/performance cookies, which allow us to recognise and count the number of visitors and users and how they use the Service. This helps us improve how the Service works, by ensuring users find what they are looking for more easily, for example.
 - Functionality cookies, which recognise when you return to the Service, so we can greet you by name and associate you with your stored preferences.
 - Targeting cookies, which record your visit to our Service and potentially other sites, the pages you have visited and the links you have followed so that we or third parties could make the Service and the information displayed on it more relevant to your interests and/or serve advertisements.
- 6.3. The information in Annex A covers any use of cookies by us that involves us collecting and processing personal data about you.

- 6.4. Please note that third parties (including, for example, providers of external services like web traffic analysis services) may also use cookies, over which we have no control. You should refer to their Privacy Policies or Cookie Policies for the relevant information about those cookies.
- 6.5. You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. All browsers provide tools that allow you to control how you handle cookies: accept, reject or delete them. These settings are normally accessed via the 'settings', 'preferences' or 'options' menu of the browser you are using, but you could also look for a 'help' function or contact the browser provider. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of the Service.

7. Your rights

The table in Annex B to this Privacy Policy explains your rights under the DPA and how to exercise them. This Privacy Policy provides confirmation of the details required in relation to your right of access.

8. Changes to Privacy Policy

We reserve the right to add to or change the terms of this Privacy Policy on the same conditions as we may vary the RentWallet Service Terms (see Clause 17). If we change this Privacy Policy, we will post the new Privacy Policy on the Service.

9. Links to third parties

The Service may contain links to other websites and services. Please be aware that we shall not be held responsible for the privacy policies of such other sites and services.

10. How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at connected@rentwallet.net.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF, United Kingdom

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

Annex A

Personal Data Collected	Purpose	Basis for processing
<p>(a) Information that you provide by filling in forms on the Service. This includes information provided at the time of registering to use the Service, posting material or requesting further services. We may also ask you for information when you report a problem with the Service;</p> <p>(b) Your personal and contact details, including your name and surname, date of birth, e-mail address, home address and telephone numbers;</p> <p>(c) Records of any correspondence between you and RentWallet;</p> <p>(d) Details of actions you carry out through the Service;</p> <p>(e) Details of your visits to the Service and the resources that you access;</p> <p>(f) payment account and payment transaction data;</p> <p>(g) details of the properties each Landlord has registered with the Service, including property image, property name, property address, tenancy term, rent amount, tenancy agreement and other</p>	<ul style="list-style-type: none"> • To manage and administer the Service; • To enable you to use the Service; • To enable tenants to pay landlords using the Service; • To enable landlords to request their tenants to use the Service to make rental payments; • To enable landlords to see that rent has been paid by tenants; • To deal with enquiries, complaints and feedback from you; • To give you any notices under the Service Terms; • To keep you informed about payments you initiate or information that you allow access to via the Service; • To categorise payment transactions according to the type or purpose of goods or services purchased; • To update RentWallet's records; • To identify, prevent, detect or tackle fraud, money laundering and other crime; • To carry out checks required by applicable regulation or regulatory guidance; • To carry out our obligations arising from and exercise our rights under, any agreements between you and us, 	<p>The processing is necessary for:</p> <ul style="list-style-type: none"> • The performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract; • Compliance with a legal obligation to which we are subject; • The purposes of the legitimate interests pursued by us or a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data.

<p>documents uploaded by the Landlord onto the Service;</p> <p>(h) details of the tenants Landlord has registered with the Service, including tenant's photo, tenant's name and surname, tenant's email address and tenant's mobile phone number.</p>	<p>including tracing and recovering payments and debts;</p> <ul style="list-style-type: none"> • To check any instructions given to us, for training purposes, for crime prevention and to improve the quality of our customer service. <p>To disclose to third parties:</p> <ul style="list-style-type: none"> • If it is under a duty to disclose or share your personal data in order to comply with any legal obligation; • To enforce this Privacy Policy or RentWallet Service Terms; • To a credit reference agency to check your identity and to prevent fraud, (it will also keep a record of your request and use it whenever anyone applies to be authenticated in your name); • To Third Party Service Providers, agents and subcontractors, acting for us, to use for the purpose of operating the Service; • To anti-fraud agencies, for the purpose of preventing and detecting fraud; • To debt collectors and other third parties to trace you and recover any debt; • In the event that RentWallet sells any business or assets, in which case it may disclose your personal data to the prospective seller or buyer of such business or assets; • To protect the rights, property, or safety of it, its customers, or others (which includes exchanging information with other companies and organisations for the purposes of fraud protection); 	
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	<ul style="list-style-type: none"> • To investigate, prevent or detect fraud or carry out checks against money laundering; • For audit purposes and to meet obligations to any relevant regulatory authority or taxing authority. 	
Information about the device(s) you use to access the Service and your visits to and use of the Service (including your Internet Protocol address, location, browser/platform type and version, internet service provider, operating system, referral source, exit pages, length of visit, page views, website navigation and search terms used)	<ul style="list-style-type: none"> • To improve your browsing experience by personalising the Service; • To develop and improve the Service; • To ensure that content on the Service is presented in the most effective manner for you and for your computer; <p>To disclose to third parties:</p> <ul style="list-style-type: none"> • To comply with a current judicial proceeding, a court order or legal process served on us, any request by the FCA or any other regulator who may have jurisdiction over us from time to time or for audit purposes and to meet obligations to any relevant regulatory authority or taxing authority; • To enforce this Privacy Policy or RentWallet Service Terms; 	<p>The processing is necessary for:</p> <ul style="list-style-type: none"> • The performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract; • The purposes of the legitimate interests pursued by us or a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data.
Copies of passports or other identification evidence that you provide for anti-money laundering and anti-fraud purposes;	<ul style="list-style-type: none"> • To identify, prevent, detect or tackle fraud, money laundering and other crime; • To carry out checks required by applicable regulation or regulatory guidance; <p>To disclose to third parties for:</p> <ul style="list-style-type: none"> • To comply with a current judicial proceeding, a court order or legal process served on us, any request by the FCA or any other regulator who may have 	<p>The processing is necessary for:</p> <ul style="list-style-type: none"> • The performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract;

	<p>jurisdiction over us from time to time or for audit purposes and to meet obligations to any relevant regulatory authority or taxing authority;</p> <ul style="list-style-type: none"> • To enforce this Privacy Policy or RentWallet Service Terms; • To a credit reference agency to check your identity and to prevent fraud, (it will also keep a record of your request and use it whenever anyone applies to be authenticated in your name); • To anti-fraud agencies, for the purpose of preventing and detecting fraud. 	<ul style="list-style-type: none"> • Compliance with a legal obligation to which we are subject; • The purposes of the legitimate interests pursued by us or a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data.
<p>Records of any surveys that you may be asked to complete;</p> <p>Your e-mail address.</p>	<ul style="list-style-type: none"> • To provide you with information, products or services that you request or which RentWallet decides may interest you; • For statistical analysis; • To identify which elements of the Service or other products might interest you. 	<p>With your consent</p>

Annex B

Your Rights

Your Rights and How to Exercise Them	Exception
<p><u>Right of Access:</u> To obtain from us confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data and the following information: (a) the purposes of the processing; (b) the categories of personal data concerned; (c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations; (d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period; (e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning you or to object to such processing; (f) the right to lodge a complaint with a supervisory authority; (g) where the personal data are not collected from you, any available information as to their source; (h) the existence of automated decision-making, including profiling, referred to in Article 22(1) of the GDPR and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for you.</p> <p><u>How to exercise:</u></p> <p>This Privacy Policy provides confirmation of the details required in relation to your right of access.</p> <p>Under the DPA, you have a right to access certain personal records that RentWallet holds about you. Any access request may be subject to a fee to meet RentWallet's costs in providing you with details of the information they hold about you if the request is unfounded or excessive. You can exercise the right at any time by contacting RentWallet at connected@rentwallet.net</p>	
<p><u>Right to rectification:</u> to obtain from us without undue delay the rectification of inaccurate personal data concerning you.</p>	

<p>We must communication to each recipient to whom the rectified personal data have been disclosed, unless this proves impossible or involves disproportionate effort.</p> <p>We shall inform you about those recipients if you request it.</p> <p>You can exercise the right at any time by contacting RentWallet at connected@rentwallet.net</p>	
<p>Right to erasure: to obtain from us the erasure of personal data concerning you without undue delay where:</p> <p>(a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;</p> <p>(b) you object to the processing based on legitimate interest where there are no overriding legitimate grounds for the processing;</p> <p>(c) the personal data have been unlawfully processed;</p> <p>(d) the personal data have to be erased for compliance with a legal obligation to which we are subject.</p> <p>We must communication to each recipient to whom the erased personal data have been disclosed, unless this proves impossible or involves disproportionate effort.</p> <p>We shall inform you about those recipients if you request it.</p> <p>You can exercise the right at any time by contacting RentWallet at connected@rentwallet.net</p>	<p>Processing is necessary for</p> <ul style="list-style-type: none"> • Compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in us; or • The establishment, exercise or defence of legal claims.
<p>Right to request the restriction of processing concerning you: to obtain from us restriction of processing where:</p> <p>(a) the accuracy of the personal data is contested by you, for a period enabling us to verify the accuracy of the personal data;</p> <p>(b) the processing is unlawful and you oppose the erasure of the personal data and request the restriction of its use instead;</p> <p>(c) we no longer need the personal data for the purposes of the processing, but it is required by you for the establishment, exercise or defence of legal claims;</p>	<p>Where processing has been restricted under this right, such personal data shall, with the exception of storage, only be processed:</p> <p>(a) with your consent; or</p> <p>(b) for the establishment, exercise or defence of legal claims; or</p> <p>(c) for the protection of the rights of another natural or legal person; or</p>

<p>(d) you object to the processing based on legitimate interest pending the verification whether our legitimate grounds override yours.</p> <p>We must communication to each recipient to whom the restricted personal data have been disclosed, unless this proves impossible or involves disproportionate effort.</p> <p>We shall inform you about those recipients if you request it.</p> <p>You can exercise the right at any time by contacting RentWallet at connected@rentwallet.net</p>	<p>(d) for reasons of important public interest of the Union or of a Member State.</p>
<p><u>The right to data portability:</u> to receive the personal data concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from us, where:</p> <p>(a) the processing is based on consent or is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract; and</p> <p>(b) the processing is carried out by automated means.</p> <p>The exercise of this right shall be without prejudice to the right to erasure.</p> <p>You have the right to have the personal data transmitted directly from us to another controller, where technically feasible.</p> <p>You can exercise the right at any time by contacting RentWallet at connected@rentwallet.net</p>	<p>That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.</p>
<p><u>The right to object to processing:</u> to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on processing necessary for the purposes of the legitimate interests pursued by us or a third party (except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data), including profiling.</p> <p>You can exercise the right at any time by contacting RentWallet at connected@rentwallet.net</p>	<p>Where:</p> <p>(a) we demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject; or</p> <p>(b) for the establishment, exercise or defence of legal claims.</p>

<p><u>The right to ask us not to process your personal data for direct marketing purposes:</u> to object at any time to processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing.</p> <p>You have the right to ask RentWallet not to process your personal data for marketing purposes. RentWallet will usually inform you (before collecting your data) if it intends to use your data for such purposes or if it intends to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms used to collect your data.</p> <p>You can also exercise the right at any time by contacting RentWallet at connected@rentwallet.net</p>	
<p><u>The right not to be subject to automated individual decision-making, including profiling:</u> to not be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.</p> <p>You can exercise the right at any time by contacting RentWallet at connected@rentwallet.net</p>	<p>If the decision:</p> <p>(a) is necessary for entering into, or performance of, a contract between you and us;</p> <p>(b) is authorised by Union or Member State law to which we are subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or</p> <p>(c) is based on the data subject's explicit consent.</p> <p>In the cases referred to in points (a) and (c) we shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on our part, to express his or her point of view and to contest the decision.</p>

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<Amendment history>