



Protecting Your Privacy

Introduction

This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle that data, and keep it safe.

We hope the following sections will answer any questions you have but if not, please do get in touch with us via the contact details at the end.

What is the John Lewis Partnership?

The John Lewis Partnership – which we'll refer to as 'the Partnership' in this document – is made up of a number of related businesses:

- **John Lewis plc, and its subsidiaries including:**
 - **John Lewis Properties plc**
 - **Waitrose Limited**
 - **Waitrose Jersey Limited**
 - **Waitrose Guernsey Limited**

For simplicity throughout this notice, 'we' and 'us' means the Partnership. The controller for your specific tenancy agreement information is identified in your tenancy agreement.

The legal basis we rely on

The law on data protection sets out a number of different reasons for which a company may collect and process your personal data, including:

Contractual obligations

In certain circumstances, we need your personal data to comply with our contractual obligations. This will be the case for example when we process your details to ensure rent payment and deposit refunds are appropriately processed.

Legal compliance

If the law requires us to, we may need to collect and process your data. This will be the case for example when we process your data for deposit guarantees purposes.



Legitimate interest

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests. For example, when we undertake repairs to your building or premises, we may pass on your contact details to the contractor.

When do we collect your personal data?

- Tenancy agreements, onboarding forms and documentation
- Via utility meters, including gas, electricity, and water
- CCTV Cameras and ANPR in car parks
- Maintenance visits made to the premises

What sort of personal data do we collect?

We collect:

- Names, surnames of tenant and other occupants of the premises, telephone number, mobile number, email address of the tenants, via tenancy agreements and relating documentation to ensure appropriate processing of your tenancy agreement and compliance with our contractual obligations.
- Physical address and postcode - this includes your prior address, the Partnership's premise that you are leasing, and future addresses for final billing purposes. We do so to fulfil our contractual obligation to you, for the final billing purposes and maintenance of the Partnership property you lease, and to properly identify tenants in their lease agreements, which is required notably for purposes of exercising our legal and contractual rights in case of tenants' non-compliance.
- Bank Details to enable refunds.
- In order to facilitate the running of the properties some, utilities usage information is collected from meters, including water and sewage. Your image may be recorded on CCTV used in our properties - signage will be displayed where this takes place.

How and why do we use your personal data

Here's why we'll use your personal data and why

- To enable us to carry out property management services, for example: when we conduct improvement works on the property we may require data to be collected from the water and other utility meters. We do so to ensure we comply with our tenancy agreement obligations and connected legal obligations.



- To maintain our own accounts and records. We do so to comply with our legal obligations.
- To protect our customers, premises, assets, and Partners from crime, we operate CCTV systems in our stores and car parks which record images for security. We do this on the basis of our legitimate interest and to enable protection of our visitors and tenants.
- To process payments and to prevent fraudulent transactions. We do this on the basis of our legitimate interest. This also helps to protect our tenants from fraud.
- If we discover any criminal activity or alleged criminal activity through our use of CCTV, we will process this data for the purposes of preventing or detecting unlawful acts. Our aim is to protect the individuals we interact with from criminal activities.
- To comply with our legal obligations to share data with law enforcement on their request.

How long will we keep your personal data?

- Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected. This means:
 - At the end of that retention period, your data will either be deleted completely or anonymised.
 - CCTV footage is held for 30 days and, unless it is required for legal reasons, it is then deleted.
 - Tenancy agreements are held for the duration of the tenancy, and subsequently for up to 12 years before they are deleted.
 - The remainder of the data related to tenants is kept for up to 6 years before it is deleted or anonymised.

Who do we share your personal data with?

We sometimes need to share your personal data with our third parties.

Here's the policy we apply to the organisations that process the data on our behalf, aimed at keeping your data safe and protect your privacy:

- We provide the information they need to perform their specific services.
- They should use your data for the exact purposes we specify in our contract with them.
- We work with them to ensure that your privacy is respected and protected at all times.
- If we stop using their services, your data held by them will either be deleted or rendered anonymous.



Examples of the kind of third parties we work with are:

- Property Management Companies
- External Legal Firms
- Contractors & Sole Traders doing works on site
- Credit checking agencies

Sharing your data with third parties for their own purposes:

We will only do this in very specific circumstances, for example:

- For fraud management, we may share information about fraudulent or potentially fraudulent activity in our premises or systems. This may include sharing data about individuals with law enforcement bodies.
- We may also be required to disclose your personal data to the police or other enforcement, regulatory or government body, upon a valid request to do so. These requests are assessed on a case-by-case basis and take the privacy of our tenants into consideration.
- We may, from time to time, expand, reduce or sell the Partnership and this may involve the transfer of individual buildings, divisions or the whole business to new owners. If this happens, your personal data will, where relevant, be transferred to the new owner or controlling party, under the terms of this Privacy Notice.

What processing/profiling is done with your data?

- Prior to commencement of the tenancy, the letting agent used by the Partnership will perform a credit check, using an accredited reference agency.
- The Purpose of the check is as a standard credit reference, confirmation of the identity of the previous landlord (unless the tenant to be was / is the homeowner), and a financial reference to confirm the tenant's financial suitability, i.e., that they will be able to pay the rent and expenses connected with the let property on time.
- The letting agent will then report back the result of the checks.

The rights

An overview of your different rights.

You have the right to request:

- Access to the personal data we hold about you, free of charge in most cases.



- The correction of your personal data when incorrect, out of date or incomplete.
- The deletion of the data we hold about you, in specific circumstances. For example, when you withdraw consent or object and we have no legitimate overriding interest, or once the purpose for which we hold the data has come to an end (e.g. 12 years after the end of your tenancy).
- A computer file in a common format (e.g. CSV or similar) containing the personal data that you have previously provided to us and the right to have your information transferred to another entity where this is technically possible.
- Restriction of the use of your personal data, in specific circumstances, generally whilst we are deciding on an objection you have made.
- That we stop processing your personal data, in specific circumstances. For example, when you have withdrawn consent, or object for reasons related to your individual circumstances.
- That we stop any consent-based processing of your personal data after you withdraw that consent.
- Review by a Partner of any decision made based solely on automatic processing of your data (i.e. where no human has yet reviewed the outcome and criteria for the decision).

You can contact us to request to exercise these rights at any time by emailing the Partner Rights Team at the following: partnersubjectaccessrequest@johnlewis.co.uk

If we choose not to action your request we will explain to you the reasons for our refusal.

Where we rely on our legitimate interest

In cases where we are processing your personal data on the basis of our legitimate interest as above described, you can ask us to stop for reasons connected to your individual situation.

We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

Checking your identity

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice.

If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

Contacting the Regulator



If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the relevant Regulator, such as the UK Information Commissioner's Office, or Jersey's Office of the Information Commissioner.

For the ICO, you can contact them by calling **0303 123 1113**.

For the Jersey's Office of the Information Commissioner, you can contact them by calling **01534 716530**.

Any questions?

We hope this Privacy Notice has been helpful in setting out the way we handle your personal data and your rights to control it.

If you have any questions that haven't been covered, please contact our Data Protection Officer who will be pleased to help you:

- Email us at **DPO@johnlewis.co.uk**
- Or write to us at:

**Data Protection Officer
Partnership House
1st Floor
Carlisle Place
London SW1P 1BX**

*This notice was last updated on **16 May 2018**.*