



dwell Student Living and its affiliates (“dwell”)

External Privacy Policy

Last Updated: 28 Feb 2018

Protection of your Personal Data is important to us. dwell’s Privacy Policy outlines how we manage the Personal Data we collect, use and disclose. This Privacy Policy applies to all departments and business units across dwell.

dwell is committed to complying with the General Data Protection Regulation (“GDPR”). Please read this Privacy Policy so that you know and understand the purposes for which we collect, use and disclose your Personal Data.

Centurion Student Services UK Ltd operating under the brand name dwell student living , and/or its related corporations (each, “dwell”, the “Company”, the “Group”, “we”, “us” or “our”) collectively or singularly as the context requires, recognises the importance of protecting Personal Data.

dwell adopts a pragmatic approach in our business conduct.

dwell collects Personal Data only for what is required in business or in activities conducted by our organisation and will properly destroy the Personal Data once there is no business or legal purpose for retaining it. We do not collect Personal Data randomly or indiscriminately without purpose.

dwell does not disclose your Personal Data unless prior consent has been obtained and we have administrative, physical and Information Technology (IT) security measures to protect your Personal Data.

This does not affect any rights which Centurion may have at law in connection with the collection, use or disclosure of your Personal Data.

1. Your Personal Data

1.1 “Personal Data” as defined in the GDPR means refers to any data or information about you from which you can be identified either (a) from that data; or (b) from that data and other information to which we have or are likely to have access. Examples of such Personal Data which you may provide us include, but is not limited to (depending on the nature of your interaction with us):

- i. your name, NI number, passport number or other identification number, telephone number(s), mailing address, email addresses and any other information relating to you which you have provided us in any form you may have submitted to us (i.e. student



accommodation application forms, job application forms, etc.), or in our other forms of interaction with you;

- ii. information about your use of our websites and services, including cookies, IP addresses, email subscription and membership details (where applicable);
- iii. your Curriculum Vitae, employment history, testimonials and referrals, previous drawn income, education background, , medical history and disabilities and legal and bankruptcy history (if applicable); and
- iv. your payment related information, such as your bank account details (where applicable).

2. Collection of Personal Data

2.1 Generally, dwell collects your Personal Data in the following ways:

- i. when you submit soft or hard copy forms relating to any of our products or services;
- ii. when you register for or use any of our services on websites owned or operated by dwell or when you register as a member of websites owned or operated by us;
- iii. when you interact with dwell's employees and staff, including during face-to-face meetings or by way of the telephone;
- iv. when you enter into a contract with us or use or purchase our services or products;
- v. when you establish any online accounts with us;
- vi. when you submit a request for us to contact you;
- vii. when you respond to our request to submit additional Personal Data;
- viii. when you subscribe or ask to be included in an email or other mailing list;
- ix. when you respond to our promotions and other marketing and publicity initiatives;
- x. when you respond to our market surveys;
- xi. when you submit a job application or a scholarship application;
- xii. when we receive references from business partners and third parties;
- xiii. when you submit your Personal Data to us for any other reason; and
- xiv. when you browse our website. Please refer to the Cookie Policy for more information.

2.2 If you provide Personal Data of a third party (e.g. information of your dependent, spouse, children and/or parents) to us, you represent and warrant that you have obtained the consent



of that third party for the collection, use and disclosure of their Personal Data for the purposes set out above.

3. How do we use Personal Data and to whom we disclose it?

3.1 dwell's goal is to understand your needs and provide you with products and services that you require. To do this effectively, dwell needs to collect certain Personal Data.

3.2 In general, dwell may collect, use and disclose your Personal Data for the following purposes:

- a. to provide you with the products or services that have been purchased or requested;
- b. to help manage the delivery of and enhance our products and services, including analysing current customer needs and identifying potential future needs;
- c. updating your records in our databases; monitoring and maintaining a copy of your record of previous transactions with dwell;
- d. to communicate and respond to your queries, requests and complaints;
- e. to provide ongoing marketing and publicity information about our products and services and upcoming events which may be of interest to you;
- f. to ascertain security clearances and access controls at dwell facilities;
- g. for security, surveillance and employee monitoring purposes;
- h. to handle disputes and complaints and conduct and facilitate investigations and proceedings when required;
- i. to protect and enforce dwell's contractual and legal rights and obligations;
- j. to prevent, detect and investigate crime, and to analyze and manage other commercial risks;
- k. to manage the infrastructure and business operations of dwell and to comply with other dwell internal policies and procedures;
- l. to facilitate business asset transactions (which may extend to any merger, acquisition or asset sale) involving dwell; and
- m. to comply with any applicable rules, laws and regulations, codes of practice or guidelines or to assist in law enforcement and investigations by relevant authorities.

3.3 In addition, Centurion may collect, use and disclose your Personal Data for the following purposes, depending on the nature of our relationship with you:



a. If you have a customer account with us, are a prospective customer or a customer:

- i. to process your application for a dwell account;
- ii. to maintain and administer your dwell account with us;
- iii. to verify your personal particulars and process payment requests in relation to provision of products and services, which you may be entitled to, or which you may have requested for;
- iv. to provide you with the products and services which you have may have entered into a contract with dwell for or purchased from dwell;
- v. to communicate changes and developments to dwells policies, terms and conditions and other administrative information, including for the purposes of servicing you in relation to products and services offered to you;
- vi. to send marketing and publicity emails which may of interest to you;
- vii. to resolve complaints and handle requests and enquiries;
- viii. to conduct market research for statistical, profiling, statistical analysis and planning for the improvement of dwell's products and services provided to you; and
- ix. to process your Personal Data in relation to any of the purposes stated above.

b. If you use download or use any of our mobile applications ("apps"):

- i. to process your application for subscription services if such services provided for in the apps;
- ii. to administer and maintain your account with us;
- iii. to verify and process your personal particulars and process payment requests in relation to provision of products and services connected to the app;
- iv. to provide you with the goods and services which you have purchased or signed up for via the app;
- v. to communicate changes and developments to dwell's policies, terms and conditions and other administrative information, including for the purposes of servicing you in relation to products and services offered to you;
- vi. to resolve complaints and handling requests and enquiries;
- vii. to conduct market research for statistical, profiling, statistical analysis and planning for the improvement of dwell's products and services provided to you; and
- viii. to process your Personal Data in relation to any of the purposes stated above.

c. If you are a prospective tenant/resident or a tenant/resident:

- i. to administer and conduct appropriate due diligence checks;
- ii. to prepare the relevant dwell lease and/or licence documentation and any other documents as may be required;
- iii. to administer the relevant leases or licences ;
- iv. to administer and perform financial transactions such as rental payments;
- v. to resolve complaints and handling requests and enquiries;
- vi. to communicate changes and developments to dwell's policies, terms and conditions and other administrative information; and



- vii. any other purpose related to any of the above.
- d. **If you are a vendor, a prospective vendor or a contractor:**
 - i. to evaluate your proposals for working with dwell and to conduct relevant background checks on you;
 - ii. to communicate with your deployed staff, after award of contract, who are in our properties to carry out work or services, and for any emergency or security concerns; and
 - iii. any other purpose relating to any of the above.
- e. **If you submit a job application to us as a candidate for employment:**
 - i. to evaluate your suitability for employment with dwell, including pre-recruitment checks and checking on provided references for more detailed background screening/vetting;
 - ii. to organise training and staff development programs;
 - iii. to maintain and manage employee relations, including annual performance assessments/appraisals;
 - iv. to administer and manage benefits and payroll processing;
 - v. to provide you with the relevant/correct tools as required for you to do carry out your job responsibilities;
 - vi. to resolve complaints and handling requests and enquiries;
 - vii. to communicate dwell's policies and processes, codes of conduct and standard operating procedures, including for business continuity purposes; and
 - viii. any other purposes relating to the aforesaid.

3.4 When you apply for or hold a co-brand product which is offered jointly by dwell and its co-brand partner, dwell may also collect, use and disclose your Personal Data with the co-brand partners for offering, marketing and promoting any products, services, offers or events which the co-brand partner thinks may be of interest to you.

3.5 In relation to particular products or services or during your interactions with dwell, we may also notify or have specifically notified you of other purposes for which dwell collects, uses or discloses your Personal Data. If so, we will collect, use and disclose your Personal Data for these additional purposes as well, unless we have specifically notified you otherwise.

3.6 Your Personal Data will be protected and kept confidential, but subject to the provisions of any applicable law, your Personal Data may, depending on the products or services concerned, be disclosed to the following third parties:

- a. other divisions, business units or entities within the dwell;
- b. dwell's joint venture/alliance partners;
- c. agents, contractors, sub-contractors, third party service providers and specialist advisers contracted by dwell to provide administrative, financial, research, operational or other



- services, such as telecommunications, information technology, payment, payroll, processing, training, market research, storage and archival;
- d. any third party business partners who offer goods and services or sponsor contests or other promotional programmes, whether in conjunction with dwell or not;
 - e. insurers or insurance investigators and credit providers;
 - f. in the event of default or disputes, any debt collection agencies or dispute resolution centres;
 - g. any business partner, investor, assignee or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any merger, acquisition or asset sale) involving the whole dwell or entities within the dwell;
 - h. dwell's professional advisors such as our auditors and lawyers;
 - i. relevant government regulators or authority or law enforcement agency to comply with any laws or rules and regulations imposed by any governmental authority;
 - j. anyone to whom we may transfer our rights and obligations;
 - k. banks, credit card companies and their respective service providers; and
 - l. any other party as may be consented to by you, as specified by that individual or in the applicable contract.

dwell requires that third party organisations which handle or obtain Personal Data, such as service providers to dwell, acknowledge the confidentiality and sensitivity of this personal data, undertake to respect any individual's right to privacy and comply with the GDPR. dwell also requires that these organisations use this information only for limited purposes which have been agreed upon and follow dwell's reasonable directions with respect to this information.

4. Keeping Your Personal Data Accurate and Up-To-Date

4.1 dwell endeavours to ensure that Personal Data stored by us is accurate and up-to-date. dwell also understands that Personal Data may change frequently, such as changes of address and other personal circumstances. As such, dwell encourages you to contact the DPO at dpo@dwellstudent.co.uk to update your Personal. Incomplete or outdated Personal Data may result in our inability to provide you with products and services you have requested.

5. Use of cookies

5.1 The use of cookies on dwell websites are governed by our Cookie Policy. The Cookie Policy may be updated from time to time and we encourage you to check back regularly for updates to the same.

5.2 By interacting with us on our websites, you acknowledge and consent to the terms of our Cookie Policy. Should you wish to disable the use of cookies, you may do so by changing the settings on your browser. However, you may not be able to enter or use certain part(s) of our websites.



6. Third-Party Sites

6.1 Our website may contain links to other websites operated by third parties, such as our business partners. We are not responsible for the privacy practices of websites operated by third parties that are linked to our website. We encourage you to learn about the privacy policies of such third party websites. Once you have left our website, you should check the applicable privacy policy of the third-party website to determine how they will handle any Personal Data they collect from you. Please contact the owner of the respective websites should you have any questions on their privacy policies.

7. Storing of Personal Data

7.1 We will safeguard the confidentiality of your Personal Data, whether you interact with us personally, by telephone or mail, over the Internet or through forms of other electronic media. We hold Personal Data in a combination of secure computer storage facilities and paper based files and other records and take steps to protect the Personal Data we hold from misuse, loss, unauthorised access, modification or disclosure. Where we no longer require any Personal Data that we hold, that Personal Data would be destroyed or have particulars or information which may identify individuals removed.

Your Personal Data will only be disclosed for the express purpose of delivering the product or service requested and shall not be sold or disclosed to any other company for any other reason whatsoever without your consent.

All electronic storage and transmission of personal data is secured and encrypted with appropriate security technologies.

Although every reasonable effort has been made to ensure that all personal data will be so protected, dwell cannot be responsible for any unauthorised use or misuse of such information and from risks which are inherent in all internet communications.

8. Access Requests and Withdrawal of Consent

8.1 Please contact us via dpo@dwellstudent.co.uk should you wish to have access to or withdraw the consent to collect and use your Personal Data.

Your email should identify yourself and state which Personal Data and information about its use and / or disclosure is requested.. If you withdraw your consent to any or all purposes and depending on the nature of your request, dwell may not be in a position to continue to provide our products or services to you.



9. Management and Security

9.1 We have appointed Data Protection Officers to oversee our management of your Personal Data in accordance with this Privacy Policy and the GDPR. dwell trains our employees who handle Personal Data to respect the confidentiality and sensitivity of your Personal Data and views breaches of the GDPR very seriously.

10. How to contact us

10.1 If you have any questions about this Policy or any complaints relating to your Personal Data, or you would like to obtain access and make corrections to your Personal Data records (for which we may charge a fee to cover the cost of verifying the application and locating, retrieving and copying any material requested), please contact the designated Data Protection Officers for the respective business units as follows:

S/No	Business Entity	Name of Data Protection Officer (DPO)	Contact Number	Email Address
1	dwell Student Living	Data Protection Officer	+44 (0) 161 200 5540	dpo@dwellstudent.co.uk

11. Review of the Policy

11.1 This Policy will be reviewed from time to time by dwell. dwell may also from time to time update this Privacy Policy to take account of new laws and technology, changes to our operations and practices and the changing business environment. If you are unsure whether you are reading the most current version, please contact us.

Cookie Policy

This Cookie Policy applies to any websites which are operated by or on behalf of Centurion Corporation Limited and its subsidiaries ("Websites").

By using and accessing our Websites, you are consenting to our use of cookies in accordance with this Cookie Policy. This Cookie Policy may be updated from time to time. Updates to the Cookie Policy will be posted on our Websites.

If you do not agree to our use of cookies as set out in this Cookie Policy you should disable the cookies associated with our Websites by changing your browser settings accordingly.

However, you may not be able to enter certain part(s) of the Websites, and some of the functions and services may not be able to function without cookies. This may also impact your user experience while on our Websites.



What are cookies?

Cookies are small files containing a string of characters that is sent to your computer when you visit our Websites.

Depending on the type of cookies, they may store user preferences and other information.

What do we use cookies for?

We use cookies to track information such as the number of users and their frequency of use, profiles of users and their preferred sites.

We use cookies to make the Websites easier to use and to better tailor our products and services to your interests and needs. Cookies may also be used to help speed up your future activities and experience on our Websites.

When you interact with us on our Websites, we may collect for the purposes of analysis statistical information from which individuals cannot be identified ("Aggregate Information"), such as number of users, their frequency of use, the number of page views (or page impressions) that occur on the Websites and common entry and exit points into and out of the Websites.

We use such statistical information to understand how people use our Websites and to help us improve their structure and contents. We cannot identify you personally from this information.