

# Zero Deposit Customer Privacy Notice

## Introduction

This notice is here to help you understand how we collect, use and protect your personal information when you interact with us. It covers how we process data about employees, landlords, tenants and guarantors.

Global Property Ventures Limited trades as Zero Deposit. We are an insurance intermediary. We sell the Zero Deposit Guarantee/Zero Deposit Flex and/or a Deposit+ policy, insured by Equitable Rental Insurance Limited. We control the data of our customers who are introduced to us, get quotes for and take out a Zero Deposit Guarantee/Zero Deposit Flex and/or a Deposit+ policy.

## Data Controllers

Alongside Zero Deposit, the data controllers under your Zero Deposit are:

### Equitable Rental Insurance Limited

**Address:** Suite 2, Grange Place, The Grange, St Peter Port, Guernsey, GY1 2QA.

For more information [click here](#). To read Equitable's Privacy Policy, [click here](#).

### Munich Re Digital Partners

**Address:** Munich Re Digital Partners, 10 Fenchurch Avenue, London, EC3M 5BN.

For more information [click here](#). To read Munich Re Digital Partners' Privacy Policy, [click here](#).

### Great Lakes Insurance SE

**Address:** 10 Fenchurch Avenue, London, EC3M 5BN

For more information [click here](#). To read Great Lakes Insurance SE's privacy policy, [click here](#).

Your letting agent will also be a data controller.

## Your Data Rights

You can contact the Data Protection Officer if you have any questions about this Privacy Notice or using your rights under data protection laws. This includes any:

### Subject Access Request

to access your personal data and the information around its processing.

### Data Portability

to transfer your data from us to another Data Controller.

### Erasure Rectification

to have your data removed or deleted from our records.  
to have your data corrected if it is inaccurate.

### Restrict Processing

To restrict processing if your data is inaccurate or processing is unlawful.

### Objection

To object to our processing of your data, including direct marketing.

### Automated decision making and profiling

You are not subject to solely automated decisions, including those based on profiling, that have a legal or similarly significant effect. All automated decisions you make have human influence.

If you have any questions about your data rights, please contact our Data Protection Officer at [dpo@zerodeposit.com](mailto:dpo@zerodeposit.com).

### Data Protection Officer

<b>Name of DPO</b>	Joseph Minney
<b>Address</b>	Business and Technology Centre, Bessemer Way, Stevenage, SG1 2DX
<b>Email</b>	<a href="mailto:dpo@zerodeposit.com">dpo@zerodeposit.com</a>

If you have a complaint regarding this policy, how we handle data or are unhappy with any response, we ask that you contact us in the first instance. You also have the right to complain to the Information Commissioner’s Office:

The Information Commissioner  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

### What Information do we hold and how do we use it?

We hold personal data about you. This data is used to set up your Zero Deposit Guarantee and administer and perform that contract.

Stage of the Process	Type of Information Used	Who gives us the data	Who do we share the data with	Reason for Processing	Lawful Basis of Processing
Introduction by an agent to Zero Deposit.	Each landlord, tenant and guarantor: name, address, date of birth, email address and telephone number and the address of the rental property. The amount of money you pay in rent.	Your letting agent, your landlord or your agent.	Some of the information is required to provide a quote. Some of this information, such as your name, is also shared with your landlord.	The estate agent will only pass us your information if you tell them you want a Zero Deposit Guarantee	Consent.
Providing you a Quote	Each landlord, tenant and guarantor: name, address, date of birth, email address and telephone number and the address of the rental property. The amount of money you pay in rent. The cost of the guarantee. Whether you appear on an official sanctions list.	You or any other tenant(s) and Your Letting Agent	Any other tenants, any guarantors under your assured shorthold tenancy agreement, the landlord and the letting agent.  For all new quotes Equitable Rental Insurance.	To offer a quote, to make sure we’re meeting our obligations.	Performance of our contract with you.  Compliance with our legal obligations.  Legitimate Interests.

			Previously this would have been Great Lakes Insurance SE or Munich Re Digital Partners.		
Taking out or renewing a Zero Deposit Guarantee	Premiums and fees paid. Your bank details.	We record information about when you've paid. We don't store your bank details.	We ask Stripe Inc, who provide online payment services, to process and store your card data. Stripe is a worldwide leader in providing payment services. If you need more information on how Stripe handles personal data, please follow this <a href="#">link</a> .  We use GoCardless Limited to process your direct debit details. The privacy policy for GoCardless <a href="#">is here</a> .	To take payment for a guarantee.	Performance of our contract with you.  Compliance with our legal obligations.  Legitimate Interests.
Mid-term adjustments	Information about changes to your guarantee, including the names, dates of birth, address, telephone number and email addresses of tenants coming into the property.	You, and the people who live with you, your letting agent or your landlord.	Any other tenants, any guarantors under your assured shorthold tenancy agreement and the landlord, the letting agent.  The insurer listed in your schedule.	To keep the Guarantee details up to date and make sure everyone's covered.	Performance of our contract with you.  Compliance with our legal obligations.  Legitimate Interests.
During a claim	All the information we've previously used to provide the guarantee. Any evidence relating to the claim specifically, this can include items that were in the property, inventories, your tenancy agreement, photographs and any statements you make. We also process any information TDS generates on you.	You, and the people who live with you, your letting agent, inventory clerk or your landlord.	The Dispute Service Limited. If you want more information about how TDS will handle your data, follow this <a href="#">link</a> .  The insurer listed in your schedule.	To enable TDS to make a fair decision on the claim.	Performance of our contract with you.  Compliance with our legal obligations.  Defence of legal claims  Legitimate Interests.
If money is owed after a claim	All the information we've used during the claim. Further information gathered in pursuing any debt. We may also contact your letting agent to assist us with recovery.	Experian PLC  Advantis Credit Ltd  Hunter Tracing Services	Experian PLC  Advantis Credit Ltd  Hunter Tracing Services  The insurer listed in your schedule.  Your letting agent.	To enable Our legal partner, Wilkin Chapman to pursue any debt owed following a determination by TDS.	Performance of our contract with you.  Compliance with our legal obligations.  Defence of legal claims

					Legitimate Interests.
Ending the Guarantee	Your tenancy end date.	You, and the people who live with you, your letting agent or your landlord.	The insurer listed in your schedule.	Administering your Guarantee	Performance of our contract with you.  Compliance with our legal obligations.  Legitimate Interests.
If there is a complaint.	If there is a complaint we will review all the information we hold about you.	As above.	We may share your data with your tenants, guarantors, landlord or letting agent. We may also share information with Great Lakes, TDS, Advantis Credit Ltd and the body you have complained to – the Financial Ombudsman Service or the Information Commissioner's Office.	Handling your complaint.	Performance of our contract with you.  Compliance with our legal obligations.  Legitimate Interests.
Keeping Great Lakes Informed	Your name, the dates of cover and the amounts you've paid, as well as any claims you've been involved with and their value.	The records we keep from sales and claims.	The insurer listed in your schedule.	To make sure that Great Lakes are aware of who they are insuring.	Performance of our contract with you.  Compliance with our legal obligations.  Legitimate Interests.
Marketing	Your name, telephone number and email address.	You, your landlord or your letting agent.	Marketing agencies who we work with.	Advertising to you	Consent
When you call to ask a question	Your name, telephone number and email address.  Call recordings, emails and text messages you send to us.	You, your landlord or your letting agent.	No one.	Advertising to you	Consent
Where we suspect or find evidence of fraud.	Your credit history, credit score, sanctions and information from anti-fraud databases concerning you.	Credit reference agencies, anti-fraud databases, sanctions lists, court judgments and other government agencies.	The insurer listed in your schedule.  Anti-fraud databases. Credit reference agencies.	Preventing fraud and complying with our legal obligations.	Performance of our contract with you.  Compliance with our legal obligations.

### Use of Consent

We ask for your consent to provide an initial quote and to contact you to keep you informed of developments here at Zero Deposit. You can withdraw your consent at any time, by getting in touch with our Data Protection Officer.

### Terms of the Contract

Once you have taken a guarantee with us, we hold your data to allow the performance of the contract that we have with you.

### Compliance with Our Obligations

As an FCA (Financial Conduct Authority) regulated business we must comply with a variety of legal and regulatory obligations, which may involve processing your personal data.

### Our Legitimate Interests

Our legitimate interests overlap with some of the compliance and contractual terms. We have a legitimate interest in pursuing any debts owed to us following the payment of a claim to a landlord. We also have a legitimate interest in completing statistical analysis and using your data to help us understand trends in how customers use this product. When we do this, we will – where we can – anonymise your data. We use this data to improve the service we provide and the products we sell.

### Protecting Your Information

Your privacy is important to us and we follow strict security procedures to make sure we only process your data when we need to. Your data is stored and disposed of securely.

We will deal with anyone named on the policy. It is not our policy to deal with your spouse, partner or parent without your written or verbal consent. If you would like someone else to deal with your policy on your behalf on a regular basis please let us know.

If you give us information about another person, in doing so you confirm that they have given you permission to provide it to us to be able to process their personal data (including any special personal data) and also that you have told them who we are and what we will use their data for, as set out in this privacy statement.

### Confidentiality

We treat your personal information as private and confidential. We would like to bring to your attention our obligations to disclose information in the following four exceptional cases permitted by law, and the other situations as set out below. These are:

- Where we are legally compelled to do so;
- Where there is a duty to the public to disclose;
- Where disclosure is required to protect our interest;
- Where disclosure is made at your request or with your consent.

Also, from time to time we will employ agents and subcontractors to process your personal information on our behalf. The same duty of confidentiality and security will apply to them and all processing will be carried out under our instruction.

If you make a complaint about the service we have provided, we may be obliged to forward details about your complaint, including your personal information to the relevant Ombudsman, the insurer and to Lloyds.

In the unfortunate event that you have to make a claim then we will need to disclose information with any other party involved in that claim. This may include:

Third parties involved with the claim, their insurer, solicitor or representative;

Medical teams, the police or other investigators and Courts.

### Call Monitoring and Recording

We record all calls. For the purposes of quality control, ensuring compliance with our legal obligations, handling complaints and defending legal claims, we may review and share that information.

### Keeping Your Data

We will only keep your data for as long as it is needed.

Data	Length of Time
Introduction	We will keep all information for 90 days after date where the tenancy is supposed to begin. Data will be anonymised at this point.
Once a guarantee has been taken out.	We will keep all information, personal or otherwise, for seven years following the end of the guarantee.

### Transfer of Data

We will not transfer your personal data to any countries that do not provide an adequate level of data protection. Your personal data may be disclosed to companies within the Group outside the EEA and to Service Providers outside the EEA. We ensure an adequate level of data protection is provided before transferring you data outside of the EEA.

### Changes to this information notice

If we make changes to this information notice that affects how we process your information, we will let you know and publish any changes on our website.