



OXFORD STUDENT HOMES · OXFORD STUDENT
HMO SPECIALISTS

PRIVACY POLICY

Your data, looked after.

What we collect, why we collect it, how we keep it safe, and the rights you hold over it — in plain English, and to the standard the UK GDPR and the Data Protection Act 2018 require.

Effective **June 2026** · Version 1.0 · UK GDPR & Data Protection Act 2018
oxfordstudenthomes.co.uk · info@oxfordstudenthomes.co.uk



Written to be useful, not to tick a box

Letting and managing student HMOs means we look after a great deal of personal information — yours, your tenants', and sometimes your guarantors'. We take that seriously.

This policy explains what we collect, why, how we keep it safe, and the rights you have. Where the law gives you a right, we say so. Where we share information with a third party, we say which party and why. Where we make a judgement call, we explain it. If anything is unclear, our contact details are at the end.

About us

Oxford Student Homes is a specialist student-HMO lettings and management agency based in Oxford. We act as the **data controller** for the personal information described in this policy.

Website	oxfordstudenthomes.co.uk
Email	info@oxfordstudenthomes.co.uk
Postal address	48 Bagley Wood Road, Kennington, Oxford, Oxfordshire, OX1 5LY
Phone	+44 (0) 7957 410132
ICO registration	ZC141643

We are certified and accredited by **Propertymark**, a member of **The Property Ombudsman** (TPO), and hold **Propertymark Client Money Protection** (Propertymark CMP). We do not charge VAT on our management fees.

Who this policy applies to

This policy applies if you are a **landlord** who instructs us, is considering instructing us, or whose property we manage; a **tenant** or prospective tenant of a property we let or manage; a **guarantor** named on a tenancy we set up; a **contractor** or supplier we work with; or a **visitor** to our website. If you are acting on someone else's behalf — for example, signing as a guarantor for a student — we treat your information with the same care.



01 Information we collect

We only collect what we need to do the job you have asked us to do. It falls into three groups.

1 — Information you give us directly

- **Identity details** — name, date of birth, nationality, photo ID (passport, driving licence, BRP), and National Insurance number where required.
- **Contact details** — address, email, phone number, emergency contact.
- **Financial details** — income, employment status, bank account for rent or commission settlement, credit history via referencing.
- **Right-to-Rent documents** — passport, visa, share code or other Home Office documentation.
- **Tenancy and household details** — names of other tenants, course details, student status, university, length of stay, special requirements.
- **Property information** (landlords) — ownership documents, mortgage consent, leasehold details, EPC, gas and electrical certificates, HMO or selective licence details.
- **Anything else you choose to give us** when you call, email or send us a form.

2 — Information we receive from others on your behalf

- **Referencing providers** — identity, employment, credit history and previous-landlord references.
- **Property portals** (Rightmove, OpenRent, SpareRoom and similar) when you enquire about a listing.
- **Guarantors and joint tenants** providing information relating to your tenancy.
- **Universities or colleges** where we verify student status with your permission.
- **Inventory clerks, contractors, HMRC, the Home Office, local authorities** and **previous letting agents** in the course of compliance, maintenance, tax, immigration and handover.

3 — Information we collect automatically on our website

When you visit oxfordstudenthomes.co.uk we collect technical information so the site works and stays secure: IP address, browser and device type, pages visited, links clicked, and referrer URL. We do **not** use website tracking to build a personal profile of you, and we do not sell website data to advertisers.



02 How & why we use it

We use your information to let and manage property, find tenants, meet compliance duties, administer finances, run the client portal, provide customer service, send marketing (only with consent), improve our service, protect our business, and meet our legal duties. Each use is tied to one of four lawful bases under the UK GDPR — and we never bundle them together to be vague.

Lawful basis	When we rely on it
Contract	Letting or managing your property, and administering the tenancy you signed.
Legal obligation	Right-to-Rent checks, deposit protection, NRL reporting, anti-money-laundering checks, and licensing.
Legitimate interests	Good record-keeping, debt recovery, complaints handling, IT security and service improvement. We have weighed these against your rights and will share the balancing logic on request.
Consent	Anything needing active permission — most obviously marketing emails and optional cookies. You can withdraw consent at any time.

For **special category data** (such as health information relevant to a reasonable adjustment), we rely on your **explicit consent** or, where it applies, the **legal claims** basis under UK GDPR Article 9.



03 Who we share it with

We do not sell your personal information. Ever. We share it only with those who need it to deliver the service you have asked for, or where the law requires it. Each party is itself responsible for handling your information in line with the UK GDPR.

People involved in the tenancy — landlords and tenants (relevant information exchanged between the two sides), guarantors, and joint tenants or householders.

Our service partners — referencing providers; inventory clerks; the **Deposit Protection Service (DPS)** or another government-approved scheme where appropriate; contractors; our maintenance-

reporting platform; accountants, auditors and solicitors; software and hosting providers; and payment providers and banks.

Authorities and regulators — HMRC, the Home Office, local authorities, The Property Ombudsman, Propertymark, the ICO, and the police, courts and other lawful authorities where required.

WHEN WE ARE REQUIRED TO SHARE

We may share your information where we are legally compelled to (for example, in response to a court order), or where it is necessary to defend or pursue a legal claim, prevent fraud, or protect someone's safety.



04 International transfers & security

International transfers

Most of your information stays in the UK or the European Economic Area. Where a provider (typically a software vendor) processes data outside the UK/EEA, we make sure the transfer is protected by a **UK adequacy regulation**, an **International Data Transfer Agreement** or the **UK Addendum to the EU Standard Contractual Clauses**, or **Binding Corporate Rules**. We carry out a Transfer Risk Assessment before approving any new overseas processor, and will tell you about the relevant safeguard on request.

How we keep it safe

- ✓ **Encrypted communications** — our website and landlord portal use HTTPS / TLS.
- ✓ **Access controls** — only OSH team members who need a piece of information can access it; each landlord has their own portal login.
- ✓ **Multi-factor authentication** on every system that holds personal data where the provider supports it.
- ✓ **Strong passwords** and a password manager across the business.
- ✓ **Up-to-date software**, **staff training** on data protection, and **vettred suppliers** required to handle data lawfully.
- ✓ **Paper records** kept locked when not in use and shredded when no longer needed.
- ✓ **Incident plan** — we notify the ICO within 72 hours and tell you directly where a breach is likely to affect your rights.

No system is completely secure. If we ever spot something that affects your data, we will tell you honestly, quickly and fully.



05 How long we keep it

We keep your information only for as long as we need it. These are our default retention periods; they may extend if a dispute, claim or regulatory matter is open.

What	How long	Why
Active landlord and tenant records	Life of the relationship	To run the tenancy / instruction
Tenancy agreements and inventories after end of tenancy	6 years	Limitation period for contract claims
Right-to-Rent records	12 months after the tenancy ends	Immigration Act 2014 statutory minimum — we do not keep identity documents beyond this
Deposit registration records	6 years after deposit return	Deposit-scheme audit trail
Gas Safety, EICR, EPC, PAT, Legionella records	6 years	Compliance evidence
HMO and selective licensing records	Licence period + 6 years	Local-authority audit
Anti-money-laundering documentation	5 years after relationship ends	Money Laundering Regulations 2017
Financial records, rent statements, invoices	6 years	Companies Act / HMRC
Complaint files	6 years after closure	TPO / our legal interests
CCTV or inspection photos	Up to 12 months	Proportionality, unless a dispute is open
Marketing consent records	Until you withdraw, plus a short audit log	Demonstrating consent under UK GDPR
Website analytics	Aggregate statistics only — no personal data is collected or retained	Cookieless trend analysis (Plausible)
Enquiries that do not lead to a tenancy	12 months	Following up genuine interest

DATA MINIMISATION

Right-to-Rent documents include copies of passports and visas. In line with the UK GDPR principle of data minimisation, we delete these **12 months after the tenancy ends** — the Immigration Act 2014 statutory minimum — rather than holding them for the life of the wider tenancy file.



06 Your rights

The UK GDPR gives you a set of rights over your personal information. We will help you exercise them — there is no cost, and we usually respond within **one calendar month**.

- ✓ **To be informed** — what you are reading now.
- ✓ **Of access** — a copy of the information we hold (a subject access request).
- ✓ **To rectification** — correct anything wrong or out of date.
- ✓ **To erasure** — delete information no longer needed (some records we must keep by law).
- ✓ **To restrict processing** — pause our use while something is sorted out.
- ✓ **To data portability** — receive the data you gave us in a common format.
- ✓ **To object** — including to direct marketing, which we always honour.
- ✓ **Not to be subject to automated decision-making** — see below.
- ✓ **To withdraw consent** — at any time, for anything you previously consented to.

To exercise any right, email us with **"Data Protection"** in the subject line. We may ask you to verify your identity before releasing information.

Automated decision-making

We do not use automated decision-making (including profiling) to take decisions with legal or similarly significant effects. Tenant referencing involves an automated credit-scoring step, but the **decision to offer a tenancy is always made by a human** — usually the landlord. You may request a human review of any referencing outcome.



07 Cookies, images & marketing

Cookies and website tracking

We use **strictly necessary cookies only** — the ones required for the website and portals to work, such as keeping you signed in. Our visitor statistics come from **Plausible Analytics**, a privacy-first service that sets **no cookies** and collects **no personal identifiers**: it produces aggregate counts (pages viewed, where visits came from) that cannot be traced to any individual, which is why the site carries no cookie consent banner — there is nothing to consent to. We do **not** use third-party advertising or retargeting cookies, social-media tracking pixels, or behavioural-profiling cookies.

Photographs, virtual tours and CCTV

- **Property photographs, floor plans and 360° tours** are taken on the landlord's instruction and used to market the property on portals and our website; tours may remain visible until the property is let.
- Where a tenant is in occupation, we ask permission before any new photo or tour and do not include personal belongings in marketing images.
- **CCTV** at HMO common parts is occasionally used by landlords for security; the landlord (not OSH) is the data controller, and signage will tell you so.
- **Inspection photographs** are used internally to evidence property condition and kept only as long as proportionate — typically up to 12 months unless a dispute is open.

Marketing

We send occasional updates to landlords and prospective landlords. We **only** send marketing emails where you have opted in, or where you are an existing client and the message is closely related to the service we already provide (the "soft opt-in" under PECR). Every email carries a one-click unsubscribe. We never sell your contact details, and we never send tenants marketing about commercial property services.

Children's information

Most of the people we deal with are over 18. Where we deal with anyone under 18 — for example a tenant joining their first university tenancy — we apply the same protections. We do not knowingly collect information from anyone under 13.



08 Complaints, changes & contact

Complaints

If you are unhappy with how we have handled your information, please tell us first — we would rather put it right. If we cannot resolve it, you have the right to complain to the **Information Commissioner's Office (ICO)**: ico.org.uk · 0303 123 1113 · Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. If your complaint relates to our broader service, you can also raise it with **The Property Ombudsman** at tpos.co.uk.

Changes to this policy

We review this policy at least once a year, and whenever the law, our service or our suppliers change in a way that affects how we use your information. The current version and effective date are on the cover; we keep previous versions on file. If we make a material change, we will tell affected landlords and tenants by email before it takes effect.

Contact us

Email	info@oxfordstudenthomes.co.uk — put "Data Protection" in the subject line for any rights request
Phone	+44 (0) 7957 410132
Post	Oxford Student Homes, 48 Bagley Wood Road, Kennington, Oxford, Oxfordshire, OX1 5LY
Web	oxfordstudenthomes.co.uk

We aim to acknowledge within 3 working days and respond fully within one calendar month.





Handled honestly. Held securely.

Oxford Student Homes · Oxford student HMO specialists
oxfordstudenthomes.co.uk · info@oxfordstudenthomes.co.uk



THE PROPERTY OMBUDSMAN
Approved Redress Scheme

This policy supersedes any previous privacy policy issued by Oxford Student Homes.
Provided in plain English and governed by the law of England and Wales. Member of The
Property Ombudsman · Client Money Protection registered. Effective June 2026 · Version 1.0.