

PRIVACY NOTICE – ACCOMMODATION SERVICES 2025/26

The purpose of this notice is to explain how Falmouth Exeter Plus ('FX Plus') Accommodation Services will collect and process your personal data. This notice also tells you which third parties we may share your personal data with.

FX Plus is a data controller and will only process your personal data in accordance with the current data protection legislation. We will process your personal data in accordance with the United Kingdom General Data Protection Regulation (or UK GDPR for short), and in accordance with the Data Protection Act (2018) (or DPA for short).

The Data Protection Officer for FX Plus is Jonathan Hocking, who can be contacted by:

dataprotection@fxplus.ac.uk

01326 259431 Data Protection Officer, Falmouth Exeter Plus, Penryn Campus, Treliever Road, Penryn, Cornwall, TR10 9FE

This notice will be reviewed annually to ensure continued compliance with current data protection legislation and to reflect best practice.

By applying for university owned, managed or approved accommodation, you agree to FX Plus processing your personal data (including sensitive personal data), for the purposes and in the manner set out in this notice and for other legitimate purposes connected with the application and offer process and your accommodation agreement.

What information is being processed about you

The type of personal data and sensitive personal data we may process about you consists of:

- Your full name and your student number
- Student photograph held on file
- Your home and term time addresses
- Your contact details including email and telephone number
- Your date of birth
- Your nationality
- Your gender
- Your course of study
- Personal details of your guarantor
- Any disability or other medical information that has been provided to FX Plus

How and why your information is processed

Your personal data is processed by FX Plus for the purpose of managing your application for accommodation and to fulfil its contractual obligations to you in the provision of your accommodation. It may also be collected to fulfil legal obligations and/or regulatory duties that it owes to its regulators and to other third parties.

Accommodation Services collects your personal data from the following sources:

- Personal details from the Falmouth University or University of Exeter Student Record System
- The information contained on your Room Service application form
- Information provided by you during the application process and whilst a resident in the accommodation

How your personal data will be used



Here are some of the ways we will use your personal data. This list is not exhaustive but is intended to provide you with an idea of the things that we may need to do, to manage the application and offer process and your provision of accommodation. We will not use your data for any purpose other than those listed and for maintaining your accommodation records and/or protecting your wellbeing.

- Management of the application and offer process. To allocate the accommodation personal details are a factor used to endeavor to meet medical needs and living preferences selected on your application.
- Administration of the accommodation agreement and guarantor agreement.
- Payments associated with your accommodation and services such as catering or gym membership will be made through our financial service provider, Falmouth University Finance Department.
- For the purpose of room moves or contract changes to another residence or room type e.g. moving from a shared room to single occupancy.
- Management of the move-in process for arrivals. Personal data is used for verification of identity for room key packs and arrival slots.
- Management of health and safety in halls. The medical information disclosed by you is
 processed by Accommodation Services to support your medical needs and allocation,
 including accessibility requirements such as adaptations and personal emergency
 evacuation plans.

This processing is necessary for:

- The performance of the contract between you and FX Plus for the provision of your accommodation.
- FX Plus's compliance with any statutory obligations; and/or to protect the interests of the data subject or another person.

Sensitive Personal Data

Some of the personal data FX Plus processes about you will be 'sensitive personal data'. This category of personal data will be subject to additional protections. Sensitive personal data for example is information about your racial or ethnic origin, religious or similar beliefs, physical or mental health condition. This information is processed for some of the reasons set out above.

Who your personal data is shared with

- Information concerning your physical or mental health will be disclosed to the FX Plus Student Services Living Support and Accessibility teams and to the Night Services team so that a proper level of facilities and support may be provided, including out of hours support. This personal data will only be sent to people who need to know this information to support you.
- If you purchase a gym membership when accepting your offer of accommodation, we may share your personal details with the FX Plus Sports Centre for the purpose of administering this service to you.

In processing your personal data and/or sensitive personal data, FX Plus may have reason to share this data with a third party (this list is not exhaustive):

- In exceptional circumstances where we are concerned about your safety/wellbeing or if we consider you to be a risk to yourself or others we may share limited information both internally and with relevant third parties (for example next of kin, Ambulance, Police, NHS Trusts etc.) to ensure your wellbeing.
- Should you fall into arrears of payment of your accommodation fees, we may disclose your personal data to a third party (e.g. your nominated guarantor, solicitors, debt recovery agents and Courts) to help pursue and recover the debt.
- We will disclose details of full-time registered students to the relevant Council if requested so that liability for Council Tax may be established.
- If you are allocated to a nominated accommodation such as The Sidings, Armyn house, The View, Maritime Studios or Treliske Halls your personal details on your application will

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be shared with the nominated accommodation providers to enable them to enter into a contract with you and subsequently provide you with accommodation services and facilities. This purpose may include processing sensitive personal data you choose to disclose regarding health conditions or disabilities relevant to your accommodation. At present our nominated accommodation providers include, but are not limited to, CRM Students, Hello Student and Sanctuary Students.

- Personal details will be shared with third party providers who help with the • administration and operational day-to-day running of the Halls of Residence. At present our nominated providers include, but are not limited to, Sanctuary Students (Henry Scott Tuke House).
- If you have accepted an offer for catered accommodation, we will share your personal details with Catering Services so that the catered package can be delivered to you.
- To deliver externally hosted IT services or products to FX Plus. Data will only be used to provide the contracted services. Our current approved IT and infrastructure provider is Occam Systems Ltd (part of Kinetic Solutions Ltd).
- Any data collected as part of the ResLife programme will be handled directly by The Student's Union and will be covered by their privacy notices, please check on https://www.thesu.org.uk/tac/datasharing/.
- If you enter into an agreement with FX Plus to show your room for events such as University open days, we will share your personal details with Falmouth University or the University of Exeter so that vouchers can be provided as arranged.

What happens with your personal data

On departure of your accommodation at the end of your accommodation agreement, FX Plus will retain your personal details and accommodation record for a period of six years. This data is retained in order to provide a record of your accommodation offer and period and also to allow FX Plus to pursue debt recovery if required.

If you apply for accommodation but do not accept an offer of accommodation, we will retain your personal details provided on the application as a record of the rejection/withdrawal of your offer. The data will be retained while you are registered as a student with Falmouth University or University of Exeter. Your personal data will not be shared elsewhere in this instance. Some information may be retained for statistical purposes.

Our reasons for processing your data

What we do	Our legal basis under UK GDPR
Deliver our service to you with regards to	Article 6(1)(b) – this is necessary for the
accommodation during your student life with	performance of our contract with you
Falmouth University or the University of	Article $6(1)(f)$ – this is necessary for our
Exeter	legitimate interests.
Contact you with regard to your accommodation	Article 6(1)(b) – this is necessary for the performance of our contract with you.
	Article $6(1)(f)$ – this is necessary for our
	legitimate interests.
Share your details with other FX Plus teams	Article $6(1)(f)$ – this is necessary for our
to ensure the safety and wellbeing of you and other accommodation residents	legitimate interests

Your Rights

You are in complete control. You can object to the use of your personal data at any time. Though in some cases we may not be able to provide your requested service where the information processing is an integral part of the service. We will tell you if this is likely to be the case.

Subject to some legal exceptions, you have the right to:





- request a copy of the personal information FX Plus Accommodation Services holds about you;
- to have any inaccuracies corrected;
- to have your personal data erased;
- to place a restriction on our processing of your data;
- to object to processing; and
- to request your data to be ported (data portability).

To learn more about these rights please see the **ICO website**.

Please address any such requests to the FX Plus Data Protection Officer.

What you can do if you are unhappy with the way your data is being processed FX Plus is transparent about its processing of your personal data. However, should you have any queries about how FX Plus processes your personal data; you should contact our Data Protection Officer by emailing <u>dataprotection@fxplus.ac.uk.</u>

If you think that any of your personal data held by Falmouth Exeter Plus is incorrect (for example if you change your contact details), please let us know so that we can update our records accordingly.

You have the right to complain to the Information Commissioner (<u>https://ico.org.uk</u>) if you are not satisfied with the handling of your personal data by FX Plus.

The Information Commissioner's Office can be contacted at the following address: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF