

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 landlords, tenants and guarantors.

Global Property Ventures Limited trades as Zero Deposit. We are an insurance intermediary. We sell the Zero Deposit Guarantee, insured by Great Lakes Insurance SE. We control the data of our customers who are introduced to us, get quotes for and take out a Zero Deposit Guarantee.

Data Controllers

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

Munich Re Digital Partners

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

For more information, visit the website: [click here](#).

To read Munich Re Digital Partners' privacy notice: [click here](#).

Great Lakes Insurance SE

Address: Great Lakes Insurance SE, 10 Fenchurch Avenue, London, EC3M 5BN, United Kingdom.

For more information, visit the website: [click here](#).

To read Great Lakes Insurance SE's privacy notice: [click here](#).

Credit Kudos

(where details are shared using
Open Banking)

Address: 4 Bath Place, London, EC2A 3DR to visit their website [click here](#).

To read Credit Kudos' Privacy Notice [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	To have your data removed or deleted from our records.
Rectification	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.

If you have any questions about your data rights, please contact our Data Protection Officer at dpo@zerodeposit.com.

Data Protection Officer

Name of DPO	Joseph Minney
Address	Business and Technology Centre, Bessemer Way, Stevenage, SG1 2DX
Email	dpo@zerodeposit.com

If you are unhappy with any response, you may raise a complaint with 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 to 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's: 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. Great Lakes Insurance SE. If you need more information on how Great Lakes handles your data, its privacy notice is here .	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's: 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. Great Lakes Insurance SE.	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.
When you give us access via Open Banking	When we sell a Zero Deposit Guarantee, we will ask you for access to your spending details via Open Banking. This will give us read-only access to the accounts you specify. The information we will be able to access will include the name, date and amount of any transactions. It will not include any of your log-in information or passwords. When you link an account, through Credit Kudos they will request that your Account Provider provides us with up to 2 years' worth of transactions data. You will be asked to reconfirm you are happy for us or Credit Kudos to access your accounts every 90 days. If you don't provide such confirmation, our access to your transaction data	You and Credit Kudos whose privacy notice can be found here .	Great Lakes Insurance SE. Munich Re Digital Partners Limited.	To assess the likelihood of a claim. We and our partners use this data, to carry out various underwriting, claims and financial assessments, research and analysis activities <ul style="list-style-type: none"> In circumstances where we required additional evidence to assess the appropriateness of our products. To make sure we're meeting our obligations, To prevent and detect fraud To regularly review and improve the products and services we or our partners provide and To carry out analytic research. 	<i>Initial Access</i> Performance of our contract with you. <i>Storing Historic Data</i> Compliance with our legal obligations.

	<p>will expire. This means that we will not receive any further transaction data from your Account Provider unless you reconnect your account.</p> <p>However, we will continue to hold transaction data that you have already given us access to, in accordance with the “Keeping your data” section below, unless you ask us to delete this data. This enables us to carry out research and analysis and to link your previous transaction data to you if you reconnect your accounts in the future.</p> <p>We will also store the outcome of any checks on our system to ensure we can demonstrate that we have acted fairly.</p>				
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.	<p>We ask Stripe Inc, who provide online payment services, to process and store your card data.</p> <p>Stripe are worldwide leader payment service provider. If you need more information on how Stripe handles personal data, follow this link.</p> <p>We use GoCardless Limited to process your direct debit details. The privacy notice for Go Cardless is here.</p>	To take payment for a guarantee.	<p>Performance of our contract with you.</p> <p>Compliance with our legal obligations.</p> <p>Legitimate Interests.</p>
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.	<p>Any other tenants, any guarantors under your assured shorthold tenancy agreement and the landlord, the letting agent.</p> <p>Great Lakes Insurance SE.</p>	To keep the Guarantee details up to date and make sure everyone’s covered.	<p>Performance of our contract with you.</p> <p>Compliance with our legal obligations.</p> <p>Legitimate Interests.</p>
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	You, and the people who live with you, your letting agent, inventory clerk or your landlord.	<p>The Dispute Service Limited. If you want more information about how TDS will handle your data, follow this link</p> <p>Great Lakes Insurance SE.</p>	To enable TDS to make a fair decision on the claim.	<p>Performance of our contract with you.</p> <p>Compliance with our legal obligations.</p> <p>Defence of legal claims.</p>

	make. We also process any information TDS generates on you.		Munich Re Digital Partners (MRDP).		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.	You, and the people who live with you, your letting agent, inventory clerk or your landlord.	Wright Hassall LLP. If you want more information about how Wright Hassall handle personal data you can find it using this link . Great Lakes Insurance SE. Your letting agent.	To enable Wright Hassall 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.
When you give us access via Open Banking to validate a payment plan application.	When you ask for a payment plan we will ask you to complete an Open Banking check, using Credit Kudos. We will ask you for access to your spending details via Open Banking. This will give us read only access to your bank account. We will be able to see the name, date and amount of any transactions. We will not see your login details or passwords. When you link an account through Credit Kudos we can see up to 2 years' worth of transaction data. You will be asked to provide confirmation for our access every 90 days, this is not necessary but if you ask for a change to your payment plan we may need you to re-apply. There is no cost to you when doing this. The data we gather about you will not be transferred onto our system, except for statistical analysis purposes.	You provide us with permission to access your personal data via the Credit Kudos System.	We will share your data with MRDP or GLISE. We may also need to share your data with the Financial Ombudsman Service if you make a complaint.	To help us establish that the payment plan that is the most efficient and fair way to pay back the money you owe us. We also use this data to help us, MRDP and GLISE establish whether or not we are operating this scheme fairly and efficiently.	Consent Compliance with our legal obligations
Ending the Guarantee	Your tenancy end date.	You, and the people who live with you, your letting agent or your landlord.	We send this data to Great Lakes Insurance SE and Munich Re Digital Partners.	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,	Handling your complaint.	Performance of our contract with you. Compliance with our legal obligations.

			Wright Hassall and the body you have complained to – the Financial Ombudsman Service or the Information Commissioner’s Office.		Legitimate Interests.
Keeping Great Lakes Insurance SE 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.	We send this data to Great Lakes Insurance SE and Munich Re Digital Partners.	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.	Dealing with your enquiries about our services and product.	Compliance with our legal obligations.
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.	Great Lakes Insurance SE and Munich Re Digital Partners. 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 [obtain access to open banking when setting up a payment plan 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 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 by the tenant or their guarantor 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 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 sub-contractors 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.

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 the 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 or end our claims and recoveries process, including any payment plan, whichever is later.

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.

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.