PRIVACY NOTICE

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Goodacres Bedford Limited – trading as Austin Belle Lettings ("Austin Belle", "we", "us" or "our") respects your privacy and is committed to protecting your personal information.

This Privacy Notice explains how we collect, use, store and share personal information when we provide residential letting, rent collection and property management services, operate our website, communicate with landlords, tenants and applicants, and otherwise carry out our business.

This Privacy Notice applies to landlords, prospective landlords, tenants, prospective tenants, applicants, guarantors, occupiers, contractors, suppliers, website visitors and other individuals whose personal information we process.

We process personal information in accordance with applicable UK data protection law, including the UK GDPR, the Data Protection Act 2018, the Data (Use and Access) Act 2025 ("DUAA"), the Privacy and Electronic Communications Regulations 2003 ("PECR"), and other applicable legislation.

The data protection framework was amended by the DUAA, with the relevant data protection provisions now in force. We will keep this Privacy Notice and our data protection practices under review as regulatory guidance develops.

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1. WHO WE ARE

The organisation responsible for your personal information is:

Goodacres Bedford Limited – trading as Austin Belle Lettings

Company number: 16730772

Registered office: 27 St. Cuthberts Street, Bedford, England, MK40 3JG

Trading address: 27 Castle Road, Bedford, Bedfordshire MK40 3PL

Telephone: 01234 866775

Email: Lauren@simongoodacreproperty.co.uk

Website: www.simongoodacreproperty.co.uk

For most of the processing described in this Privacy Notice, Austin Belle acts as the data controller.

We are registered with the Information Commissioner's Office as a data controller (registration number: [to confirm]).

If you have questions about how we use your personal information, or wish to exercise your data protection rights, please contact:

Data Protection Contact: Lauren Goodacre

Email: Lauren@simongoodacreproperty.co.uk

Address: 27 Castle Road, Bedford, Bedfordshire MK40 3PL

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2. WHAT PERSONAL INFORMATION DO WE COLLECT?

Depending on our relationship with you and the services involved, we may collect and process the following categories of personal information.

2.1 Identity and contact information

This may include:

- full name;
- previous names;
- date of birth;
- postal address;
- previous addresses;

- email address;
- telephone number;
- nationality;
- identification documents;
- signatures;
- photographs where relevant; and
- correspondence and communication records.

2.2 Landlord information

If you are a landlord or prospective landlord, we may collect:

- property ownership information;
- mortgage information;
- lender details;
- freeholder or superior landlord information;
- insurance information;
- bank account details;
- tax-related information where relevant;
- company or trust information;
- beneficial ownership information;
- anti-money laundering information;
- identification documents;
- correspondence;
- property information;
- tenancy information;
- payment information; and
- records of instructions you give us.

2.3 Tenant and applicant information

If you are a tenant, prospective tenant or applicant, we may collect:

- identity information;
- date of birth;
- current and previous addresses;
- contact details;
- employment information;
- employer details;
- income information;

- financial information;
- bank details;
- credit and referencing information;
- previous landlord information;
- tenancy history;
- Right to Rent information;
- immigration-status information where legally required;
- information about guarantors;
- information about intended occupiers;
- information about pets;
- correspondence and communications;
- information relating to maintenance or tenancy issues; and
- information concerning complaints, disputes or possession matters.

3. HOW WE COLLECT PERSONAL INFORMATION

We may collect personal information:

- directly from you;
- through our website;
- by telephone;
- by email;
- through online application forms;
- through property portals;
- from landlords;
- from tenants;
- from prospective tenants;
- from guarantors;
- from employers;
- from previous landlords or letting agents;
- from referencing providers;
- from credit reference agencies;
- from government departments and public authorities;
- from Companies House;
- from HM Land Registry;
- from local authorities;
- from contractors and suppliers;
- from insurers;
- from solicitors and other professional advisers; and
- from other lawful sources.

Where we receive personal information about you from another organisation, we will provide the privacy information required by applicable data protection law, subject to any lawful exemption.

The ICO confirms that privacy information should generally be provided when personal information is collected and, where information is obtained indirectly, the applicable transparency requirements must also be considered.

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4. WHY WE USE YOUR PERSONAL INFORMATION

We may use personal information for the following purposes:

Letting and property management

- marketing properties;
- arranging viewings;
- communicating with applicants and tenants;
- assessing applications;
- carrying out referencing;
- arranging tenancies;
- managing existing tenancies;
- collecting rent;
- managing arrears;
- dealing with repairs and maintenance;
- arranging inspections;
- managing tenancy deposits;
- dealing with check-in and check-out;
- managing tenancy changes;
- dealing with pet requests;
- communicating with landlords and tenants;
- dealing with complaints;
- managing possession matters; and
- providing other services requested by our clients.

Legal and regulatory compliance

We may process personal information to:

- comply with our legal obligations;
- comply with Right to Rent requirements;
- comply with anti-money laundering requirements;
- comply with client-money requirements;

- comply with tenancy deposit legislation;
- comply with housing and property legislation;
- comply with tax requirements;
- comply with court orders;
- respond to requests from government bodies and regulators;
- prevent and detect fraud;
- prevent unlawful activity; and
- establish, exercise or defend legal claims.

Business administration

We may use personal information to:

- manage our accounts;
- process payments;
- maintain business records;
- manage our relationships with clients and suppliers;
- administer insurance;
- manage complaints;
- maintain professional and regulatory records;
- improve our services;
- maintain our IT systems;
- maintain security; and
- protect our business and property.

Marketing

Where legally permitted, we may use your contact information to send you information about our services, properties, market updates and other relevant communications.

We will comply with applicable direct marketing requirements, including PECR.

You can opt out of marketing communications at any time.

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5. OUR LAWFUL BASES FOR PROCESSING

We will only process personal information where we have a lawful basis to do so.

Depending on the circumstances, our lawful bases may include:

5.1 Performance of a contract

We may process personal information where this is necessary to enter into or perform a contract with you.

For example:

- managing a landlord's property;
- arranging a tenancy;
- collecting rent;
- communicating with a tenant;
- arranging repairs; and
- administering our services.

5.2 Legal obligation

We may process personal information where necessary to comply with a legal obligation.

Examples include:

- Right to Rent checks;
- anti-money laundering checks;
- tenancy deposit requirements;
- client-money requirements;
- tax and accounting requirements;
- court orders;
- regulatory requirements; and
- responding to lawful requests from public authorities.

5.3 Legitimate interests

We may process personal information where this is necessary for our legitimate interests, or those of a third party, provided those interests are not overridden by your rights and interests.

Our legitimate interests may include:

- operating and administering our lettings business;
- managing properties;
- communicating with landlords and tenants;
- preventing fraud;

- recovering unpaid sums;
- managing disputes;
- maintaining records;
- improving our services;
- protecting our business;
- managing security;
- enforcing contractual rights; and
- maintaining appropriate business and professional records.

Where we rely on legitimate interests, we will consider the impact of the processing on individuals and whether our interests are appropriately balanced against their rights.

In addition, the Data (Use and Access) Act 2025 recognises certain "recognised legitimate interests" (such as preventing crime, safeguarding, and responding to emergencies) for which the balancing test does not apply. We will rely on these only where the relevant statutory conditions are met.

5.4 Consent

In certain circumstances we may rely on your consent.

Where we rely on consent, you may withdraw your consent at any time.

Withdrawal of consent will not affect the lawfulness of processing carried out before you withdrew your consent.

We will not rely on consent where another lawful basis is more appropriate.

5.5 Vital interests

In exceptional circumstances, we may process personal information where necessary to protect someone's vital interests.

5.6 Public task

Where applicable, we may process information where necessary for a task carried out in the public interest or in the exercise of official authority.

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6. SPECIAL CATEGORY INFORMATION

Special category information receives additional protection under data protection law.

Depending on the circumstances, we may process information which could reveal:

- health information;
- disability information;
- racial or ethnic origin;
- religious or philosophical beliefs;
- biometric information used for identification; or
- other special category information.

For example, a tenant may voluntarily provide health or disability information relevant to a reasonable adjustment, accessibility requirement, repair or property-management issue.

We will only process special category information where a lawful condition for doing so applies.

Where appropriate, this may include:

- explicit consent;
- employment or social protection law;
- substantial public interest;
- legal claims;
- vital interests; or
- another applicable condition under UK data protection law.

We will only collect and use special category information where reasonably necessary for the relevant purpose.

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7. CRIMINAL OFFENCE INFORMATION

We may process information relating to criminal convictions or offences where this is necessary and permitted by law.

We will only process such information where the applicable legal requirements are satisfied.

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8. TENANT REFERENCING AND CREDIT CHECKS

When assessing a prospective tenant, we may use third-party referencing providers and credit reference agencies.

This may involve processing:

- identity information;
- address history;
- employment information;
- income;
- financial information;
- credit history;
- previous tenancy information;
- publicly available information; and
- information provided by referees.

Referencing information may be used to assess suitability for a tenancy and to assist landlords in making informed decisions.

Austin Belle does not guarantee that a tenant will pay rent, comply with their tenancy or maintain a property.

Where automated processing or profiling is used, we will comply with applicable legal requirements and safeguards.

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9. RIGHT TO RENT

Where applicable, we process personal information to carry out Right to Rent checks.

This may include:

- identity information;
- immigration-status information;
- passport or immigration-document information;
- Home Office share-code information;
- copies or records of relevant documents; and
- records of the outcome of checks.

We may share relevant information with the Home Office or other authorities where required or permitted by law.

Right to Rent information will be retained only for as long as necessary to comply with the applicable legal and regulatory requirements.

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10. ANTI-MONEY LAUNDERING

As a letting agent, we may be required to comply with anti-money laundering legislation.

We may therefore collect and process:

- identity documents;
- proof of address;
- ownership information;
- company information;
- beneficial ownership information;
- source-of-funds information;
- transaction information; and
- other information required for customer due diligence.

Where required by law, we may report information to the relevant authorities.

Where the law prevents us from telling you that a report has been made, we will not disclose that information.

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11. WHO WE SHARE PERSONAL INFORMATION WITH

We may share personal information where necessary and lawful with:

Property-related organisations

- landlords;
- tenants;
- prospective tenants;
- guarantors;
- freeholders;
- superior landlords;
- contractors;
- tradespeople;
- inventory providers;
- inspection providers;
- property-management providers;

- utility providers; and
- insurers.

Referencing and tenancy providers

- tenant referencing companies;
- credit reference agencies;
- identity verification providers;
- Right to Rent service providers;
- tenancy deposit schemes;
- property portals; and
- tenancy-management software providers.

Professional advisers

- solicitors;
- barristers;
- accountants;
- insurers;
- surveyors;
- compliance advisers; and
- other professional advisers.

Public authorities and regulators

Where legally required or permitted, information may be shared with:

- HM Revenue & Customs;
- Home Office;
- local authorities;
- courts and tribunals;
- police;
- regulators;
- the Information Commissioner's Office;
- redress schemes;
- Client Money Protection providers; and
- other government or regulatory bodies.

We do not sell personal information to third parties.

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12. PROPERTY PORTALS

Where you enquire about a property through a property portal, your personal information may be provided to us by that portal.

We may use the information to:

- respond to your enquiry;
- arrange a viewing;
- assess your application;
- provide property information;
- arrange referencing; and
- progress a potential tenancy.

The relevant property portal may also process your information under its own privacy notice.

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13. CONTRACTORS AND MAINTENANCE

If you are a tenant or occupier, we may provide relevant information to contractors where necessary to arrange repairs or maintenance.

This may include:

- your name;
- property address;
- telephone number;
- email address;
- details of the reported issue;
- access arrangements; and
- other information reasonably required to complete the work.

We will only provide information reasonably necessary for the contractor to carry out the relevant service.

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14. INTERNATIONAL DATA TRANSFERS

Some of our service providers may process personal information outside the United Kingdom.

Where personal information is transferred outside the UK, we will ensure that the transfer is carried out in accordance with applicable UK data protection law.

Depending on the circumstances, this may involve:

- a UK adequacy regulation;
- appropriate safeguards;
- applicable contractual protections;
- an approved transfer mechanism; or
- another lawful basis for the transfer.

Where required, we will provide further information about relevant safeguards.

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15. HOW LONG WE KEEP PERSONAL INFORMATION

We will not keep personal information for longer than is reasonably necessary for the purposes for which it was collected, unless we are legally required or permitted to retain it for longer.

Retention periods vary depending on the type of information.

For example:

Type of information	Typical retention period
Landlord records	Duration of relationship + appropriate statutory limitation/record-keeping period
Tenancy records	Duration of tenancy + appropriate statutory limitation/record-keeping period
Applicant information where no tenancy proceeds	Normally deleted/anonymised when no longer required, subject to legal and legitimate business requirements
Referencing information	In accordance with our retention schedule and applicable legal requirements
Financial/accounting records	In accordance with applicable tax and accounting requirements
Anti-money laundering records	In accordance with applicable AML requirements
Right to Rent records	In accordance with applicable Home Office requirements
Complaints	For as long as reasonably necessary to investigate, resolve and defend the complaint
Legal claims	Until the matter and applicable limitation period have expired
Marketing information	Until you unsubscribe or it is otherwise no longer required

We maintain an internal data retention schedule which determines specific retention periods.

Where information is no longer required, we will securely delete it, anonymise it or otherwise dispose of it securely.

16. SECURITY OF YOUR PERSONAL INFORMATION

We take appropriate technical and organisational measures to protect personal information against:

- unauthorised access;
- accidental loss;
- destruction;
- alteration;
- disclosure;
- misuse; and
- other unlawful processing.

Depending on the circumstances, our security measures may include:

- access controls;
- passwords and authentication;
- encryption;
- secure cloud systems;
- restricted staff access;
- staff training;
- secure document disposal;
- supplier due diligence;
- backups;
- anti-malware and security controls; and
- appropriate incident-response procedures.

No electronic transmission or storage system can be guaranteed to be completely secure.

17. DATA BREACHES

If Austin Belle becomes aware of a personal data breach, we will assess the incident and take appropriate action in accordance with applicable data protection law.

Where notification to the Information Commissioner's Office or affected individuals is legally required, we will make the necessary notification within the applicable timeframe.

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18. YOUR DATA PROTECTION RIGHTS

Subject to applicable legal conditions and exemptions, you may have the right to:

Right to be informed

You have the right to understand how and why we process your personal information.

This Privacy Notice provides that information.

Right of access

You may request a copy of the personal information we hold about you.

Right to rectification

You may ask us to correct inaccurate or incomplete personal information.

Right to erasure

In certain circumstances, you may ask us to delete your personal information.

This right is not absolute and does not apply where we have a lawful reason to retain the information.

Right to restriction

In certain circumstances, you may ask us to restrict the processing of your personal information.

Right to object

You may have the right to object to certain processing, including processing based on legitimate interests and certain forms of direct marketing.

Right to data portability

In certain circumstances, you may have the right to receive personal information you have provided to us in a structured, commonly used and machine-readable format and/or request that it is transferred to another organisation.

Rights concerning automated decision-making

Where applicable, you may have rights relating to decisions based solely on automated processing which produce legal or similarly significant effects.

These rights are subject to statutory conditions and exceptions.

The DUAA has amended aspects of the UK's data protection framework, including provisions concerning automated decision-making and individual rights. We will apply the rights applicable to the processing concerned at the time of your request.

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19. HOW TO EXERCISE YOUR RIGHTS

To exercise any of your rights, contact:

Email: Lauren@simongoodacreproperty.co.uk

Post: 27 Castle Road, Bedford, Bedfordshire

Please provide sufficient information to allow us to identify you and understand your request.

We will deal with requests within the applicable statutory timeframe.

Following changes made by the Data (Use and Access) Act 2025, we are required to carry out reasonable and proportionate searches when responding to a request, and where we reasonably need to clarify your request the statutory response period may be paused until you respond.

We will not normally charge a fee for exercising your data protection rights. However, where permitted by law, we may charge a reasonable fee or refuse a request which is manifestly unfounded or excessive.

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20. DATA PROTECTION COMPLAINTS

If you are unhappy about the way Austin Belle has handled your personal information, we ask that you contact us first so that we have an opportunity to investigate and resolve your concerns.

Please contact:

Data Protection Complaints Contact: Lauren Goodacre, Director

Email: Lauren@simongoodacreproperty.co.uk

Address: 27 Castle Road, Bedford, Bedfordshire MK40 3PL

We will maintain an appropriate process for receiving and handling data protection complaints.

We will acknowledge your complaint and keep you informed of the outcome within a reasonable period.

The DUAA introduced a statutory requirement for organisations to have a data protection complaints process, which is now part of the current data protection framework.

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21. COMPLAINING TO THE INFORMATION COMMISSIONER'S OFFICE

You also have the right to complain to the Information Commissioner's Office ("ICO") if you believe that your personal information has been handled unlawfully.

The ICO is the UK's independent data protection regulator.

Under the Data (Use and Access) Act 2025 the ICO is being reconstituted as the Information Commission; references to the ICO in this notice include its successor body.

Information Commissioner's Office

Website: https://ico.org.uk

Telephone: 0303 123 1113

We would, however, encourage you to contact Austin Belle first so that we can attempt to resolve your concerns.

22. DIRECT MARKETING

We may contact you by telephone, email, SMS or other electronic means about our services where legally permitted.

We will comply with the Privacy and Electronic Communications Regulations and applicable data protection law.

You can unsubscribe from marketing emails by using the unsubscribe facility provided in the relevant communication or by contacting us.

You may also object to direct marketing at any time.

Your objection to marketing will not affect processing carried out for other lawful purposes.

23. TELEPHONE CALLS

We may record or monitor telephone calls where necessary for:

- training;
- quality control;
- security;
- complaint handling;
- record keeping; or
- establishing what was communicated.

Where required, we will provide appropriate information about call recording.

24. WEBSITE AND COOKIES

Our website may use cookies and similar technologies.

Some cookies are necessary for the website to operate.

Other cookies may be used for purposes such as:

- analytics;

- performance;
- functionality;
- advertising; or
- understanding website usage.

Where consent is legally required, we will obtain consent before placing or accessing the relevant cookies or similar technologies.

The current PECR framework requires organisations to tell users about relevant storage/access technologies and, subject to applicable exceptions, obtain consent before using them.

Our website will provide further information through our Cookie Notice / Cookie Settings.

Cookie Notice: [link to be added once the website Cookie Notice is live]

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25. ANALYTICS AND TRACKING

Where we use analytics, tracking pixels, advertising technologies or similar technologies, we will ensure that their use complies with applicable PECR and data protection requirements.

The ICO's current guidance expressly covers cookies, tracking pixels, device fingerprinting and other storage/access technologies.

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26. AUTOMATED DECISION-MAKING AND PROFILING

We may use automated systems as part of our business, including for:

- identity verification;
- referencing;
- fraud prevention;
- affordability assessment;
- credit assessment; and
- property or marketing analytics.

Where automated processing amounts to a decision producing legal or similarly significant effects, we will comply with the applicable requirements concerning safeguards, information and individual rights.

Where decisions involve human review, that will be carried out in accordance with our internal procedures.

27. CHILDREN'S INFORMATION

Our services are generally directed towards adults.

However, because a tenancy may include children or information concerning children, we may process children's personal information where necessary to provide our services or comply with legal obligations.

We will only collect and use children's information where reasonably necessary and lawful.

28. THIRD-PARTY WEBSITES

Our website or communications may contain links to third-party websites.

We are not responsible for the privacy practices or content of third-party websites.

You should review the privacy notice of any third-party website you visit.

29. SOCIAL MEDIA

Austin Belle may operate social-media accounts and may receive or process personal information through those platforms.

Social-media providers operate their own privacy policies and may process information independently from Austin Belle.

We recommend reviewing the privacy information provided by the relevant platform.

30. CCTV AND PROPERTY SECURITY

Where CCTV, video doorbells or other security systems are installed at a property, the relevant controller will depend upon the circumstances.

Austin Belle may process information obtained from security systems where necessary to manage the property, investigate incidents, protect people or property, or comply with legal obligations.

Where Austin Belle operates or controls such systems, we will provide appropriate privacy information.

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31. LANDLORDS PROVIDING INFORMATION ABOUT OTHER PEOPLE

If you provide Austin Belle with personal information about another individual, such as:

- a joint landlord;
- tenant;
- guarantor;
- occupier;
- contractor;
- family member;
- employee; or
- other person,

you should ensure, where appropriate, that the individual knows that their information has been provided to Austin Belle.

We may provide them with our Privacy Notice or otherwise provide the privacy information required by law.

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32. TENANTS PROVIDING INFORMATION ABOUT OTHER OCCUPIERS

If you provide information about other occupiers, including children or family members, you confirm that you are authorised to provide that information where required.

We will process the information only for lawful and necessary purposes.

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33. DATA ACCURACY

We aim to keep personal information accurate and up to date.

You should tell us if your personal information changes or if you believe information we hold about you is inaccurate.

We may periodically ask you to confirm or update relevant information.

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34. DATA MINIMISATION

We will seek to collect only information which is reasonably necessary for the purposes for which it is processed.

We will not deliberately collect personal information which is irrelevant to the services we provide.

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35. ACCOUNTABILITY AND DATA PROTECTION GOVERNANCE

Austin Belle maintains appropriate data protection policies and procedures proportionate to the nature and scale of our business.

These may include:

- data protection policies;
- information-security procedures;
- data retention procedures;
- data breach procedures;
- access-control procedures;
- supplier due diligence;
- staff training;
- data-sharing procedures; and
- procedures for handling individual rights requests.

Where appropriate, we will maintain records of our processing activities and undertake data protection impact assessments for processing which is likely to result in a high risk to individuals.

The ICO's accountability framework requires organisations to consider and document their processing activities and apply appropriate governance measures.

36. DATA PROCESSORS

We use third-party organisations to provide certain services on our behalf.

Examples may include:

- property management software;
- CRM systems;
- email providers;
- cloud storage;
- referencing providers;
- accounting software;
- payment providers;
- website hosting providers;
- IT providers;
- document-signing platforms;
- communications providers; and
- other specialist service providers.

Where a third party processes personal information on our behalf, we will take appropriate steps to ensure that the processing is subject to appropriate contractual and data protection safeguards.

37. CHANGES TO THIS PRIVACY NOTICE

We may update this Privacy Notice from time to time to reflect:

- changes in legislation;
- regulatory guidance;
- changes to our services;
- changes to our technology;
- changes to the way we process information; or
- other relevant developments.

The latest version will be published on our website.

We recommend checking this Privacy Notice periodically.

Last updated: 22 September 2026.

38. CONTACT US

If you have any questions about this Privacy Notice or how Austin Belle uses your personal information, please contact us.

Austin Belle Lettings — Goodacres Bedford Limited

Address: 27 Castle Road, Bedford, Bedfordshire MK40 3PL

Email: Lauren@simongoodacreproperty.co.uk

Telephone: 01234 866775

Website: www.simongoodacreproperty.co.uk

39. DATA PROTECTION REGULATOR

If you wish to contact the ICO:

Information Commissioner's Office

Website: https://ico.org.uk

Telephone: 0303 123 1113

END OF PRIVACY NOTICE