

10sure™ Privacy Policy: Data Protection and User Information Handling

1. Data Controller Information

10sure™ Ltd is the designated data controller for your personal information. We are registered with the Information Commissioner's Office (ICO) under registration number: xxxxxx.

Our Commitment to Privacy

At 10sure™ Limited ("10sure™", "us", "our" or "we"), we prioritize the protection of your data, privacy, and personal information. We are dedicated to ensuring our customers feel secure when using our Services.

Scope of This Policy

This privacy policy, in conjunction with our terms of use (<https://www.10sure.co.uk/terms-of-service>) and related documents, outlines:

- Types of information we collect
- How we use your information
- Circumstances under which we share information with third parties
- Your rights regarding the personal data you provide

We encourage you to read this policy carefully to understand our data practices.

Credit Reference Agencies

When providing our services, we may share your personal data with Credit Reference Agencies ("CRAs"), including Experian, Equifax, and TransUnion.

- These CRAs act as *independent data controllers* when they receive and process your data.
- They use your data to verify identity, prevent fraud, and maintain credit information files.
- Under Article 14 of the UK GDPR, CRAs are responsible for publishing information explaining how they process and share your data.
- You can access this information via their Credit Reference Agency Information Notices (CRAINs):
 - Experian: www.experian.co.uk/crain
 - Equifax: www.equifax.co.uk/crain
 - TransUnion: <https://www.transunion.co.uk/legal/privacy-centre>

We rely on you having read these notices before we share your data with CRAs, as they explain in detail how your information may be used and your rights under data protection law.

Acknowledgment and Consent

When you visit our website (<https://www.10sure.rent>), use our "10sure™" application, or utilize any of our services, you will be asked to acknowledge and, where applicable, consent to the practices described in this policy.

Third-Party Websites

Our Website may contain links to third-party websites. Please note:

- These third-party sites have their own privacy policies
- We are not responsible for their policies or how they process your personal information
- We recommend reviewing their policies before submitting any personal information

By using 10sure™'s services, you agree to the collection and use of information as outlined in this policy.

2. Data Collection and Processing

Information You Provide

When interacting with our Platform, you may be asked to provide information when you:

- Complete forms on our Website or App
- Register for our Services
- Subscribe to newsletters or marketing materials
- Use our Services
- Report issues
- Participate in surveys

This information may include:

- Personal details (name, address, date of birth, nationality)
- Contact information (email, phone number)
- Financial information (income, bank details)
- Identification documents (passport number, national insurance number)
- Tenancy-related information (previous addresses, landlord references)
- Other occupant details

Automatically Collected Information

During your visits to our Website or App, we may automatically collect:

- Device information (hardware model, operating system, unique identifiers)
- Technical data (IP address, browser type)
- Usage details (clickstream data, visit duration, page interactions)
- App store information

Third-Party Information

We may receive information about you from third parties to facilitate your use of our Services.

Consent for Third-Party Data

If you provide us with personal data of third parties, you must have their clear consent and provide them with a copy of this Privacy Policy.

Cookie Usage

By using our Platform, you agree to our use of cookies. For more information, please refer to our Cookie Policy: <https://www.10sure.co.uk/cookie-policy>

Record of Processing Activities

10sure™ maintains a comprehensive Record of Processing Activities (ROPA) as required by Article 30 of GDPR. This record includes detailed information about categories of personal data processed, purposes of processing, categories of data subjects, recipients of data, retention periods, and security measures implemented. We regularly update this record to reflect any changes in our data processing activities

3. Data Usage and Legal Basis

Legal Grounds for Data Processing

Under UK and EU data protection laws, 10sure™ processes your personal information based on the following legal grounds:

Consent

You provide explicit, informed, and freely given consent for specific data uses. You may withdraw this consent by notifying us as detailed below.

Contract Performance

We use your information when necessary to enter into or fulfill our contract with you.

Legal Obligation

We process your data to comply with our legal obligations.

Legitimate Interests

We use your information to achieve legitimate business interests, ensuring our reasons outweigh any potential prejudice to your data protection rights.

Legal Claims

Your information may be necessary for defending, prosecuting, or making claims against you or third parties.

Data Utilization

We use the information we hold about you (and information about others you've provided) in the following ways:

[List specific ways 10sure™ uses personal data]

For a comprehensive understanding of how we use your data, please refer to our detailed Privacy Policy.

4. Information Collection and Usage for All Users

Personal Identification Data

We collect your email address and name to:

- Provide access to our Website, App, and requested information
- Enable use of our Services

This data processing is necessary for contract performance.

Marketing Communications

We use your email address and name to:

- Market products and services we believe may interest you
- This is based on:
 - Legitimate interest for marketing our similar products/services and re-engagement campaigns
 - Your consent for marketing unrelated products/services or third-party offerings

Service Updates

We utilize your email address to:

- Notify you about changes to our Services

This is justified by our legitimate interests in keeping our Services up-to-date.

5. Data Collection and Usage for Renters

Personal Identification and Contact Information

We collect your email address, name, date of birth, current address, and previous addresses to:

- Provide access to our Website, App, and requested information
- Enable use of our Services

This data processing is necessary for contract performance.

Linked Account Information

We collect information from linked accounts such as social networking sites to:

- Administer our Services
- Suggest relevant support tools, not used for automated lending decisions

This processing is based on your consent.

Comprehensive Personal and Financial Data

We collect identity confirmation, right to reside in the UK, date of birth, current and previous addresses, gross income, pay slips, credit records, payment details, banking information, education history, employment history, legal and regulatory warnings, and global watch list appearances to:

- Provide our Services, specifically the Rent10
- Identify personalized insurance and non-insurance based services

This is justified by legitimate interests, consent (for open banking information), and contract performance (for rental payment tracking and income verification). Rent10 is not a credit profile completeness or lending recommendation.

Identity Verification Data

We collect your email address and name to:

- Provide Right to Rent identity verification services through [Identity Verification Provider]

This is based on consent and legal obligation.

We also collect identity documents, biometric data, mobile number, and supplementary information to prove right to rent in the UK.

Marketing Data

We use your email address and name for:

- Marketing products and services we believe may interest you

This is based on legitimate interest for our own similar products/services and re-engagement campaigns, and consent for unrelated or third-party offerings.

Tenancy and Utility Information

We collect move-to and move-from addresses, tenancy details, and council tax status to:

- Provide Services as described in our terms and conditions
- Share relevant data with [Service Provider] as contracting parties

This is based on consent, contract performance, and legitimate interest.

Payment and Service Administration Data

We collect email address, name, payment details, and bank account information to:

- Administer our Services, including payment processing through [Payment Processor]
- Conduct internal operations, research, data analysis, and statistics
- Create derived, anonymized, and aggregated data to improve our Services

This is justified by contract performance and legitimate interests.

Service Update Notifications

We use your email address to:

- Notify you about changes to our Services

This is based on our legitimate interests in keeping our Services up-to-date.

6. Data Usage for Landlords and Build to Rent (Institutional Landlords)

Account Access and Service Provision

Information collected: Email address, name

Usage: To provide access to our Website, App (including 10sure™ Account), requested information, and our Services

Justification: Contract performance

Marketing Communications

Information collected: Email address, name

Usage: To market relevant products and services

Justification:

- Legitimate interest (for similar products/services and re-engagement campaigns)
- Consent (for unrelated or third-party products/services)

Service Administration and Improvement

Information collected: Email address, name, payment details, bank account information

Usage:

- Administer Services including Renter Screening
- Process payments through [Payment Processor]
- Conduct internal operations, research, data analysis
- Create derived, anonymised, and aggregated data to enhance Services
- Justification:
- Contract performance (Renter screening, payment processing)
- Legitimate interests (service administration and improvement)

Service Updates

Information collected: Email address

Usage: Notify users about changes to our Services

Justification: Legitimate interests (to keep Services up-to-date)

By providing this information, landlords and Build to Rent institutions agree to its use as outlined above, in compliance with our Privacy Policy and applicable data protection laws.

7. Data Usage for Letting Agents and Build to Rent (Institutional Landlords)

Account Access and Service Provision

Information collected: Email address, name

Usage: To provide access to our Website, App (including 10sure™ Account), requested information, and our Services

Justification: Contract performance

Marketing Communications

Information collected: Email address, name

Usage: To market relevant products and services

Justification:

- Legitimate interest (for similar products/services and re-engagement campaigns)
- Consent (for unrelated or third-party products/services)

Service Administration and Improvement

Information collected: Email address, name, payment details, bank account information

Usage:

- Administer Services including Renter Screening
- Process payments through our payment processor
- Conduct internal operations, research, data analysis
- Create derived, anonymised, and aggregated data to enhance Services
- Justification:
- Contract performance (Renter screening, payment processing)
- Legitimate interests (service administration and improvement)

Service Updates

Information collected: Email address

Usage: Notify users about changes to our Services

Justification: Legitimate interests (to keep Services up-to-date)

Data Sharing and Ownership

We will not sell your personal data to third parties. However, we reserve the right to share anonymised and/or aggregated data. You acknowledge that we own all rights to any derived, aggregated, or anonymised data we collect or create.

By providing this information, letting agents and Build to Rent institutions agree to its use as outlined above, in compliance with our Privacy Policy and applicable data protection laws.

8. Data Usage for Guarantors

Personal Identification and Contact Information

We collect your email address, name, date of birth, current address, and previous addresses to:

- Provide access to our Website, App, and requested information
- Enable use of our Services

This data processing is necessary for contract performance.

Linked Account Information

We collect information from linked accounts such as social networking sites to:

- Administer our Services

- Suggest relevant support tools, not used for automated lending decisions

This processing is based on your consent.

Comprehensive Personal and Financial Data

We collect identity confirmation, right to reside in the UK, date of birth, current and previous addresses, gross income, pay slips, credit records, payment details, banking information from our banking service, education history, employment history, legal and regulatory warnings, and global watch list appearances to:

- Provide our Services, specifically the Rent10
- Support document-based profile completeness via Rent10 (not a credit profile completeness or verification) for renters to share with Landlords
- Process document data to reflect verification status only — not affordability or credit data overview

This is justified by legitimate interests, consent (for open banking information), and contract performance (for income verification required by Landlords/Agents). Rent10 is not a credit profile completeness or lending recommendation.

Identity Verification Data

We collect your email address, name, identity documents (UK/EU/International Passport, UK Drivers License, UK/EU Residence Card, UK Immigration document), biometric data, mobile number, and supplementary information to:

- Provide Right to Rent identity verification services through [Identity Verification Provider]

This is based on consent and legal obligation.

Payment and Service Administration Data

We collect email address, name, payment details, and bank account information to:

- Administer our Services, including payment processing through our payment processor
- Conduct internal operations, research, data analysis, and statistics
- Create derived, anonymized, and aggregated data to improve our Services

This is justified by contract performance and legitimate interests.

Service Update Notifications

We use your email address to:

- Notify you about changes to our Services

This is based on our legitimate interests in keeping our Services up-to-date.

Data Usage Limitation

Guarantor information will only be used for the purpose for which it was collected and will not be used for any additional purposes, such as marketing.

9. Referee Information Handling

Data Collection

We collect the following information from referees:

- Email address
- Name
- Telephone number
- Job title
- Employment details

Purpose and Usage

This information is used solely to administer our Services, including Renter Screening services.

Legal Basis

We process this data based on:

- Consent
- Legitimate Interest (to conduct necessary background checks)

Usage Limitation

Referee information is strictly used for its intended purpose and will not be utilized for additional purposes such as marketing.

If Rent10 progress is shown via UI cookies, add that no profile completeness or behavioural analysis is tied to it.

10. Marketing Communications

Types of Marketing

Service-Related Marketing

We may send newsletters and marketing emails about our own similar services and products.

Legal Basis: Legitimate interest (to market our products and services)

Opt-out: You have the right to unsubscribe at any time

Third-Party Offers

We may send details about unrelated services, products, special offers, or discounts from our selected business partners.

Legal Basis: Consent (which can be withdrawn at any time)

Consent and Opt-Out

Consent Collection

Where required by law, we will ask for your consent before conducting any marketing activities.

Unsubscribe Options

- An unsubscribe or opt-out option will be provided in all electronic marketing communications
- You may also opt out by contacting us directly

11. Data Storage and International Transfers

Storage Location

Personal data we collect, including email addresses for marketing purposes, is processed and stored within the European Economic Area (EEA).

Data Transfers

We transfer your data outside the EEA only with your consent, except for transfers to:

- Countries with a valid adequacy decision from the European Commission
- Organizations ensuring adequate protection levels in accordance with applicable data protection laws

International Processing

Your data may be processed outside the EEA for purposes outlined in this policy. For countries without equivalent safeguards, we will:

- Obtain your consent where possible
- Use appropriate safeguarding measures, such as Standard Contractual Clauses, in compliance with data protection legislation

Third-Party Sub-processors

A comprehensive list of our third-party sub-processors and their privacy policies is available at: <https://www.10sure.rent/sub-processor>

Password Security

- Passwords are stored in encrypted form on 10sure™'s servers
- We do not disclose your account details
- You are responsible for maintaining password security

Data Transmission Security

While we implement strict security measures, internet data transmission is not entirely secure. We cannot guarantee the absolute security of data transmitted to our Website. You transmit information at your own risk.

Further Information

For specific details on safeguards applied to your personal information exported outside the EEA, please contact us.

12. Information Sharing and Disclosure

Third-Party Service Providers

We may disclose your personal information to our service providers and business partners, including:

- Payment processors
- Database tool providers
- Analytics providers (to improve and optimize our Website)
- Members of our group (subsidiaries as defined in section 1159 of the UK Companies Act 2006)

These disclosures are made to assist us in performing our contractual obligations and providing our Website and Services.

Payment Processing

We share your personal information with our third-party payment processor, Stripe, which manages rent payments, bill splitting between tenants, and facilitates pay-as-you-go services for Renters. For more details about Stripe, please refer to our terms of service.

Business Transfers

If we sell or buy any business or assets, or if 10sure™ or substantially all of its assets are acquired by a third party, we may disclose your personal information to the prospective buyer or seller. Your data would be one of the transferred assets in such cases.

Legal Obligations

We may disclose your personal data if required to comply with any legal obligation or to protect the rights, property, or safety of 10sure™, our customers, or others. This includes exchanging information with other companies and organizations for fraud protection purposes.

Fraud Prevention

We and other organizations may access and use your personal information to conduct credit checks and prevent fraud. If false or inaccurate information is provided and fraud is identified or suspected, details may be passed to fraud prevention agencies.

Information Sharing with Rental Parties (Note: Rent10 is not a credit profile completeness or financial rating)

As a Renter, we will share your name, email address, previous and current addresses (up to three years), nationality, and Rent10 information with Letting Agents and Landlords.

As a Landlord, we will share your name, email address, and bank account information for payments with Renters and Letting Agents.

As a Letting Agent or Operator, we will share your name, email address, and bank account information for payments with Renters and Landlords.

Additional Services

As part of our Services, we offer Renters additional features. Details about these services and related data sharing will be provided separately.

All information sharing is conducted in accordance with applicable data protection laws and based on appropriate legal grounds such as contract performance, legitimate interest, consent, or legal obligation.

13. Data Retention Policy

Duration of Data Storage

We retain your personal information for as long as necessary to provide our Services, typically 12 months, or as required by law or relevant regulatory bodies. Certain documents, such as identity verification or financial records, may be held for extended periods to comply with legal obligations.

Account Termination and Data Deletion

Upon account termination or deactivation, we delete personal data associated with your account within 72 hours. For inactive accounts, we may contact you after 2 years to confirm your continued interest in our Services.

Extended Retention for Compliance

Some personal data may be retained longer to ensure 10sure™'s compliance with applicable laws and internal procedures. This includes retaining email addresses for marketing suppression if you've opted out of further communications.

Multi-Purpose Data Retention

For information used for multiple purposes, we retain it until the expiration of the longest applicable retention period. However, we cease using it for purposes with shorter retention periods once those periods expire.

Data Access Restrictions

We limit access to your personal information to individuals who require it for relevant purposes.

Retention Period Determination

Our retention periods are based on business needs. Once information is no longer needed, it is either irreversibly anonymized (with the anonymized data potentially retained) or securely destroyed.

14. Your Data Protection Rights

Under the UK General Data Protection Regulation (UK GDPR), you have several rights regarding your personal data. These include:

- **Right to Rectification** – You can request correction of inaccurate or incomplete personal data.
- **Right to Erasure** – You can ask us to delete your personal data where there is no lawful reason for us to continue processing it.
- **Right to Restrict Processing** – You can request that we limit the way we use your personal data.
- **Right to Data Portability** – You can request a copy of your data in a structured, commonly used, and machine-readable format and ask us to transfer it to another controller where technically feasible.
- **Right to Object** – You can object to certain types of processing, including direct marketing and automated decision-making.
- **Right to Lodge a Complaint** – You have the right to complain to a supervisory authority such as the Information Commissioner’s Office (www.ico.org.uk).

Please note that exercising some of these rights may impact our ability to provide you with certain services.

To exercise any of your rights, please contact us at support@10sure.co.uk.

15. Credit Reference Agencies (CRAs)

When you use 10sure™, we may share your rental payment information and tenant history with Credit Reference Agencies (“CRAs”), specifically **Experian, Equifax, and TransUnion**.

- These CRAs act as **independent data controllers** when they receive and process your information.
- They are responsible for making available clear information about how they use and share your data, as required under Article 14 of the UK GDPR.
- You should review their **Credit Reference Agency Information Notices (CRAINs)** before we share your information, as these explain in detail how your personal data may be used and your rights:
 - [Experian CRAIN](#)
 - [Equifax CRAIN](#)
 - [TransUnion Privacy Centre / CRAIN](#)

10sure™ does not generate affordability scores, credit ratings, or lending recommendations. Data shared with CRAs is limited to the information required for verification, identity checks, and rental reporting purposes.

We and the CRAs will ensure your information is treated in accordance with UK data protection law, kept secure, and not used for marketing purposes.

16. Policy Updates and Notifications

We may periodically update our privacy policy. Any changes will be:

- Posted on this page
- Communicated to you via email or in-app notifications, where appropriate

We encourage you to review this policy regularly to stay informed about how we process your information.

Regular Review

We conduct annual reviews of our data processing activities and consent records to ensure ongoing compliance with GDPR and other relevant data protection regulations. These reviews include assessing the necessity and proportionality of our data processing, evaluating the effectiveness of our security measures, and updating our practices as needed. Any significant changes resulting from these reviews will be communicated to our users as outlined in our policy update procedures

17. Contact Information and Data Protection

For questions, comments, or requests regarding this privacy policy, please contact:
support@10sure.co.uk

Data Controller:

10sure™ Limited is the data controller for the purposes of relevant data protection legislation.

Data Protection Officer:

To discuss this Privacy Policy or inquire about the processing of your personal data, contact our Data Protection Officer at:
[Data Protection Officer Email]

18. Cookie Usage and Management

10sure™ uses cookies to:

- Distinguish you from other users
- Enhance your browsing experience
- Improve our Services

You can disable cookies through your browser settings, but this may affect website performance and feature availability.

For detailed information on our cookie usage and purposes, please refer to our Cookie Policy at:
<https://www.10sure.rent/cookie-policy>

If Rent10 progress is shown via UI cookies, add that no profile completeness or behavioural analysis is tied to it.

Clarification on Rent10

The Rent10 system does not calculate a credit or affordability score. It displays verification status of documents with user consent. Agents and landlords see status indicators (e.g. 'Verified') only. No data is used for automated decision-making or profiling without express consent.