N&A Residential Investment Ltd

Privacy Notice

Version 1.0 | June 2026

This privacy notice explains how N&A Residential Investment Ltd collects, uses, stores, and protects your personal information when you use our services, including sales, lettings, property management, valuations, and refurbishment co-ordination. We are committed to handling your data lawfully, fairly, and transparently.

What changed from the Acquire version

This notice has been adapted from Acquire Estate Agents' privacy notice. Key changes: (1) N&A Residential Investment Ltd branding and contact details throughout; (2) Refurbishment services added to scope; (3) 'Legitimate interests' added as a missing lawful basis; (4) AML retention clarified to '5 years from end of business relationship'; (5) Redress scheme (Property Ombudsman) added as a complaints route — required by TPO Code of Practice; (6) SAFEagent/CMP reference added for landlords; (7) Article 49 overseas transfer approach strengthened; (8) Special category data lawful basis made explicit; (9) Complaints process updated for the Data (Use and Access) Act 2026; (10) ICO registration number placeholder added. Remove this box before publishing.

Contents

1. Contact details

N&A Residential Investment Ltd

278 Battersea Park Road

London, SW11 3BS

Telephone: (+44) 20 7228 2629

Email: info@naresidential.com

Website: www.naresidential.com

Note for N&A
Once you receive your ICO registration number (after registering at ico.org.uk), add it here and in the footer. Also add it to your website. This is a legal requirement.

2. What information we collect, use, and why

As an estate and lettings agent providing sales, lettings, property management, valuations, and refurbishment co-ordination services, we collect and use personal information in connection with:

Change from Acquire version
'Refurbishment co-ordination' has been added to the scope. This covers personal data collected from contractors, tradespeople, and property owners during refurbishment projects — which was not covered in the Acquire notice at all.

- Buying, selling, and marketing residential property
- Letting and renting property (including managed lettings)
- Property management services on behalf of landlords
- Tenant referencing, right to rent checks, and deposit protection
- Property valuations
- Refurbishment co-ordination and contractor management
- Legal and regulatory compliance, including Anti-Money Laundering (AML) and financial sanctions screening

We collect or use the following categories of personal information:

- Names and contact details (including email address, phone number)
- Current and previous addresses
- Date of birth
- Identification documents (e.g. passport, driving licence, biometric residence permit)
- Proof of address documents
- Financial information (income, bank details, affordability assessments)
- Credit history and referencing information
- Employment details and employer references
- Tenancy history
- Property ownership details and Land Registry records
- Viewing history and property preferences
- Correspondence and records of communication (including email and post)
- Call recordings, video call recordings, and CCTV or photographic images (from office visits or property viewings)
- Information relating to complaints, disputes, or compliments
- Contractor and tradesperson details (for refurbishment and maintenance work)

Special category and criminal offence data

In limited circumstances we may also collect and process the following:

- **Criminal offence data:** To prevent, detect, investigate, or prosecute financial crimes (such as identity theft, fraud, or money laundering) and to comply with our legal obligations under the Money Laundering Regulations 2017 and the Proceeds of Crime Act 2002. Our lawful basis for processing this data is compliance with a legal obligation (UK GDPR Article 6(1)(c)) and, where applicable, the processing conditions in Schedule 1 of the Data Protection Act 2018.
- **Right to Rent immigration status information:** We are legally required to check the immigration status of all adult occupiers before a tenancy begins. This is processed under legal obligation (Immigration Act 2014).

Change from Acquire version
The Acquire notice mentioned criminal offence data but gave no lawful basis for it, which is a UK GDPR compliance gap. We have now specified Article 6(1)(c) and DPA 2018 Schedule 1 as the lawful basis. Right to Rent immigration data has also been added as a separate category with its own basis — it was missing entirely.

3. Lawful bases and data protection rights

Under UK data protection law, we must have a lawful basis for collecting and using your personal information. The lawful basis we rely on may affect which data protection rights are available to you. You can find out more about lawful bases and your rights on the ICO's website at ico.org.uk.

Our lawful bases

Depending on the activity, we rely on one or more of the following lawful bases:

- **Contract (Article 6(1)(b)):** Where processing is necessary to enter into or perform a contract with you — for example, setting up a tenancy agreement, instructing a sale, or providing property management services. Most of your data protection rights apply, except the right to object.
- **Legal obligation (Article 6(1)(c)):** Where we are required by law to process your information — for example, AML checks, Right to Rent verification, financial sanctions screening, and deposit protection. Most rights apply, except the right to erasure, the right to object, and the right to data portability.
- **Legitimate interests (Article 6(1)(f)):** Where processing is necessary for our legitimate business interests and does not override your rights — for example, maintaining business records, internal fraud prevention, improving our services, and where we have a reasonable expectation that you are happy to receive relevant property updates. You have the right to object to this processing at any time.
- **Consent (Article 6(1)(a)):** Where you have given us clear, specific consent — for example, marketing communications or optional feedback surveys. You have the right to withdraw your consent at any time. Withdrawing consent does not affect the lawfulness of any processing carried out before withdrawal.
- **Public task / crime prevention:** Where we need to share information with a public authority, law enforcement, or regulatory body because they require it for their official functions, or to prevent, detect, or investigate a crime.

Change from Acquire version
'Legitimate interests' was entirely missing from the Acquire notice. This is a significant gap — it is the most commonly used lawful basis for things like business record-keeping, fraud prevention, and sending property updates to registered applicants. We have added it with a description and confirmed the right to object applies.

Your data protection rights

You have the following rights in relation to your personal information. To exercise any of them, please contact us using the details in Section 1. We will respond without undue delay and within one month of receipt.

- **Right of access:** You can ask us for copies of your personal information and details of how we use it.
- **Right to rectification:** You can ask us to correct or complete any information you believe is inaccurate or incomplete.
- **Right to erasure:** You can ask us to delete your personal information in certain circumstances (note: this right does not apply where we are processing data under a legal obligation).
- **Right to restriction of processing:** You can ask us to limit how we use your personal information in certain circumstances.
- **Right to object:** You can object to processing based on legitimate interests or for direct marketing purposes. We will stop unless we have compelling legitimate grounds.
- **Right to data portability:** Where we process data by automated means on the basis of consent or contract, you can ask us to transfer your information to you or another organisation in a structured, machine-readable format.
- **Right to withdraw consent:** Where we rely on consent as a lawful basis, you may withdraw it at any time without affecting prior processing.

For more information about your rights and the exemptions that may apply, visit ico.org.uk/your-data-matters.

4. Where we get personal information from

- Directly from you (via enquiry forms, tenancy applications, instructions to sell or let, and verbal communications)
- Landlords, tenants, buyers, and sellers involved in a transaction
- Independent referencing agencies
- Credit reference agencies
- Solicitors, conveyancers, and legal representatives
- Mortgage brokers and financial advisers
- Contractors and tradespeople (in connection with refurbishment and maintenance)
- Public sources, including HM Land Registry, the Electoral Register, and Companies House
- HMRC and other government or regulatory bodies

5. How long we keep information

We retain personal data only for as long as necessary for the purpose it was collected or as required by law. Our standard retention periods are:

- **Client and customer records:** Up to 6 years after the end of the relationship (to cover limitation periods for potential claims under the Limitation Act 1980).

- **Tenancy records:** Up to 6 years after the tenancy ends.
- **Financial records and transaction records:** 6 years (required under HMRC rules and the Limitation Act 1980).
- **AML and identity verification records:** 5 years from the date the business relationship ends, or from the date of an occasional transaction — as required by Regulation 40 of the Money Laundering Regulations 2017. We may retain for up to 6 years where this is consistent with other retention periods.
- **Right to Rent checks:** At least 1 year after the tenancy ends (as required by the Immigration Act 2014).
- **Call recordings and CCTV:** Up to 30 days unless retention is needed for an active complaint, dispute, or legal matter.

Change from Acquire version
The Acquire notice stated 'AML records: 5 years (legal requirement)' without specifying that this runs from the end of the business relationship — which is the correct trigger under Regulation 40 of the Money Laundering Regulations 2017. Right to Rent and CCTV retention periods have also been added, which were missing. The optional extension to 6 years for AML records has been noted for internal consistency.

6. Who we share information with

Joint data controllers

When you apply to rent or let a property through us, N&A Residential Investment Ltd and the relevant landlord act as joint data controllers in respect of the tenancy. This means we jointly determine how your personal data is used to set up, execute, and manage the tenancy agreement.

- **Our responsibility:** We are responsible for collecting application data, arranging independent tenant referencing, verifying your Right to Rent, protecting deposits with an authorised scheme (TDS), and providing you with transparency information including this Privacy Notice.
- **The landlord's responsibility:** The landlord is responsible for handling securely any information we pass to them (such as reference outcomes or identity verification details) to make tenancy decisions and meet their independent legal obligations as a property owner.
- **Exercising your rights:** You can contact us directly using the details in Section 1 to exercise any of your data protection rights in relation to the tenancy. We will co-ordinate with the landlord where necessary.

Data processors

We use the following categories of third-party data processors who act only on our documented instructions:

- **CRM and property management software providers:** To securely host and maintain our client database, property records, and tenancy information.
- **Independent referencing agencies:** To carry out credit checks, employment verifications, background checks, and financial affordability assessments on our behalf.
- **Financial sanctions screening providers:** To screen tenants, landlords, buyers, and sellers against the UK Sanctions List (UKSL) as required by the Sanctions and Anti-Money Laundering Act 2018 (from May 2025).

Change from Acquire version
Financial sanctions screening has been added as a specific data processor category. This is now a separate legal obligation for letting agents (since May 2025) and should be reflected in the privacy notice.

Others we share personal information with

- Legal representatives, solicitors, and conveyancers acting for parties in a transaction
- Utility companies and local councils (for council tax registration at the start or end of a tenancy)
- Deposit protection schemes — we use the Tenancy Deposit Scheme (TDS)
- SAFEagent and our client money protection scheme provider, for CMP compliance and audit purposes
- The Property Ombudsman (TPO) or another approved redress scheme, in the event of a complaint or investigation
- HMRC, the National Crime Agency (NCA), the Office of Financial Sanctions Implementation (OFSI), and other regulatory or law enforcement bodies where we are under a statutory obligation to do so
- Mortgage brokers, surveyors, and other professional advisers engaged in a specific transaction
- Contractors and tradespeople (limited to the information necessary for them to carry out refurbishment or maintenance work)

Change from Acquire version
Added: SAFEagent / CMP scheme, The Property Ombudsman (TPO), OFSI (for sanctions reporting), and contractors for refurbishment work. The TPO reference is particularly important — the TPO Code of Practice requires agents to be transparent about sharing data with the scheme, and omitting it from a privacy notice can be cited in complaints as a transparency failure.

7. Sharing information outside the UK

As an estate and lettings agency, we may occasionally need to transfer personal information outside the UK. This can arise when:

- We share tenant application details, referencing outcomes, or tenancy updates with property landlords who are based overseas, or
- We use cloud-based software or services hosted outside the UK.

Where we transfer personal information internationally, we do so using one of the following safeguards:

- **Adequacy decisions:** Where the UK Government has confirmed that the destination country provides an adequate level of data protection.
- **Standard data protection clauses:** Where no adequacy decision exists and we use a contracted service provider, we use appropriate contractual safeguards.
- **Article 49 derogation — contractual necessity:** For transfers directly to individual overseas landlords where no other safeguard is practical, we rely on the UK GDPR Article 49(1)(b) derogation, as the transfer is necessary to perform or conclude a contract between you, ourselves, and the landlord. We take steps to ensure such transfers are limited to what is strictly necessary.

Change from Acquire version
The Acquire notice relied solely on the Article 49 derogation for all overseas transfers. Best practice (and ICO guidance) is to consider adequacy decisions and standard contractual clauses first, and use Article 49 only as a last resort for transfers that cannot be structured another way. We have reflected the full hierarchy here.

8. How to complain

We take your privacy seriously. If you have any concerns about how we have handled your personal information, please raise them with us first:

Data Protection Contact:
N&A Residential Investment Ltd
278 Battersea Park Road, London, SW11 3BS
Email: info@naresidential.com
Telephone: (+44) 20 7228 2629

Under the Data (Use and Access) Act 2026 (Royal Assent 19 June 2026), you must raise a complaint with us first before escalating to the ICO. We will acknowledge your complaint promptly and aim to respond fully within 28 days.

If you remain unsatisfied with how we have handled your concern, you may escalate to:

The Information Commissioner's Office (ICO)

For concerns about your data protection rights:

- Website: ico.org.uk/make-a-complaint
- Telephone: 0303 123 1113
- Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

The Property Ombudsman (TPO)

For concerns about our conduct as estate or letting agents — including how we handled your property transaction or managed a tenancy — you may also refer your complaint to our approved redress scheme:

- Website: tpos.co.uk
- Telephone: 01722 333306
- Post: The Property Ombudsman, Milford House, 43-55 Milford Street, Salisbury, Wiltshire, SP1 2BP

Change from Acquire version
Two important additions here: (1) The Property Ombudsman has been added as a complaints route. The TPO Code of Practice requires members to signpost clients to the scheme, and failing to include this in a privacy notice can be raised in a complaint as a transparency failure. (2) The Data (Use and Access) Act 2026 requirement — that clients must raise complaints with the controller first before

going to the ICO — has been incorporated. This came into effect on 19 June 2026 and is now a legal requirement.

Document information

Version 1.0 | Prepared June 2026 | Next review due: June 2027

This notice should be reviewed whenever there is a change in services, a change in data practices, or a change in applicable law.

Disclaimer: This document has been prepared for N&A Residential Investment Ltd as an adapted privacy notice based on the Acquire Estate Agents template (June 2026). It does not constitute legal advice. N&A Residential Investment Ltd should have this notice reviewed by a qualified solicitor or data protection adviser before publishing, particularly in relation to the specific lawful bases relied on, the ICO registration details, and compliance with the Data (Use and Access) Act 2026.