

PRIVACY NOTICE – FOUR CORNERS PROPERTY MANAGEMENT LIMITED

Table of Contents:

1.	Introduction	1
2.	How does Four Corners use your personal data?	1
3.	How does Four Corners share your personal data?	5
4.	Transfer of personal data outside the UK	6
5.	How long does Four Corners keep your personal data?	7
6.	Your privacy rights	7
7.	Changes to this privacy notice	8
8.	Contact information.....	8

1. Introduction

This privacy notice explains how Four Corners Property Management Limited (“**Four Corners**”, “**we**”, “**us**” or “**our**”) collects, uses, stores and shares your personal data when you visit our website at fourcorners.com (the “**Website**”), submit an enquiry through the Website or selected property portals, enquire about or apply for a rental property, interact with our leasing team, are a prospective or existing business contact, or otherwise engage with us.

It also describes your data protection rights, including the right to object to some of the processing which we carry out. More information about your rights, and how to exercise them, is set out in the “Your privacy rights” section.

2. How does Four Corners use your personal data?

The table below lists the personal data that Four Corners typically processes about you, the purposes for which Four Corners processes it, Four Corners’ typical sources of such data, and the lawful basis on which Four Corners relies.

Purpose	Categories of data	Source	Legal basis
To manage enquiries from prospective tenants and administer the leasing process, including lead generation, property matching, arranging and conducting	Full name, email address, telephone number, information about pets and children (including age), sharer information, whether you intend to request to run a business from home, property preferences (including preferred location, number of bedrooms, parking requirements, budget range, anticipated move-in date and any stated accessibility or pet	From you (including through the Website and selected property portals) and our external referencing provider.	It is necessary for us to process your personal data in order to perform our contract with you, or to take steps at your request prior to entering into a contract with you. Otherwise, Four Corners relies on its legitimate interest in managing the leasing process, responding to prospect enquiries

Four Corners

viewings, and progressing prospects through the pre-leasing process.	requirements), source of enquiry, communications with you, viewing arrangements and outcomes, and referencing outcome (pass/fail) returned by our external referencing provider.		and administering its rental property portfolio.
To establish customer relationships and carry out due diligence where applicable.	Name, address, date of birth, place of birth, nationality, gender, tax identification number, government-issued identity documents, proof of address, proof of source of funds, source of wealth or income, and related due diligence information where applicable. Four Corners may also collect additional data if you are a politically exposed person, subject to sanctions screening, or linked to any such person.	From you and public sources.	Four Corners' legitimate interest in conducting proportionate due diligence and managing legal, financial crime and reputational risk.
To carry out pre-screening and affordability assessments to determine whether you are eligible to proceed to tenant referencing.	Salary and affordability information, information regarding any county court judgments (CCJs), individual voluntary arrangements (IVAs) or bankruptcy (past or present), and guarantor details where required (including the guarantor's name, contact information and confirmation of their understanding of the guarantor obligations).	From you and, where applicable, from your proposed guarantor.	It is necessary for us to process your personal data in order to perform our contract with you, or to take steps at your request prior to entering into a contract with you. Otherwise, Four Corners relies on its legitimate interest in assessing the suitability and affordability of prospective tenants before proceeding to tenant referencing.
To monitor our relationship with counterparties and mitigate legal and financial crime risks in transactions.	Name, address, date of birth, place of birth, nationality, gender, tax identification number, government-issued identity documents, proof of address, proof of source of funds, source of wealth or income, sanctions screening results, politically exposed person information and other due diligence information where applicable.	From you and public sources.	Four Corners' legitimate interest in ensuring compliance with applicable law and standards of proper business conduct, and in mitigating legal, financial crime and reputational risk. Where it is necessary to process personal data to prevent, detect, or investigate a crime, we rely on our recognised legitimate interests.
To record telephone conversations for quality assurance and	Audio recordings of telephone conversations, call metadata (including date, time, duration and telephone numbers), the identity of the leasing adviser	From you, generated during telephone conversation	Four Corners' legitimate interest in monitoring and improving customer service, supporting quality assurance and staff

Four Corners

reference purposes, including complaint and dispute handling, staff training, fraud prevention, general reference, follow-up actions and business analytics. Four Corners may use AI-assisted technologies, including automated transcription, call summaries, and other analysis to process call recordings for the purposes described above. Any AI-generated outputs derived from call recordings are used solely to support the leasing team and improve operational efficiency and are not used to make automated decisions regarding prospective tenants.	handling the enquiry, transcripts and summaries derived from recordings, CRM notes and follow-up activities generated from the call, and customer communications relating to the enquiry. We have implemented safeguards to limit the inadvertent processing of more sensitive personal data.	s with our leasing team.	training, resolving disputes and improving operational efficiency.
To operate, maintain and improve the Website, and to understand how	IP address, browser type and version, device information, operating system, pages visited, referring URL, date and time of visit, and cookie and tracking	Collected automatically when you visit the Website, and via cookies and	Four Corners' legitimate interest in operating and improving the Website and understanding how visitors use it.

Four Corners

visitors use the Website.	data (subject to your cookie preferences).	similar technologies (subject to your cookie preferences).	Where non-essential cookies are used, Four Corners relies on your consent. For further information about the cookies we use and how to manage your cookie preferences, please refer to our Cookie Policy.
To respond to requests submitted through the Website, email, telephone or other contact channels.	Contact data such as name, email address and phone number, and any personal data included in the request or attached documents.	From you.	Four Corners' legitimate interest in following up customer requests and other enquiries concerning our business.
To carry out surveys.	Contact data such as name, email address and phone number, survey responses, and any other personal data included in your response.	From you.	Four Corners' legitimate interests in understanding more about residents' experiences and improving our business.
Send you marketing and promotional communications by email, telephone and WhatsApp in relation to our relevant products and services and to provide you with tailored content and ads on this and other sites, apps or social media platforms based on your interactions on the Website and other sites or apps or social media platforms (including measuring the effectiveness of our advertising campaigns).	Name, email address, phone number, IP address, browser type and version, device information, operating system, pages visited, referring URL, date and time of visit, and cookie and tracking data (subject to your cookie preferences).	From you.	Your consent when required under law. Otherwise, we have a legitimate interest in promoting our products and services, and in keeping you informed about updates and offerings that may be relevant to you.
Monitor customer	All of the above data.	From you.	When we have a legal obligation under UK law, we process the

Four Corners

accounts to prevent, detect, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime, in accordance with applicable law.			data in order to comply with applicable law and regulations. When we have a legal obligation under laws outside the UK or our processing is not pursuant to a legal obligation, we have a legitimate interest in protecting our business interests and legal rights, and the interests and legal rights of our users. In the UK, where it is necessary to process personal data to prevent, detect, or investigate a crime, we rely on our recognised legitimate interests.
To identify prospective business contacts.	Name, email address, phone number, position, employer and publicly available professional information.	From public sources.	Four Corners' legitimate interest in marketing our business and identifying relevant prospective business contacts.

For the purposes of administering the leasing process and carrying out pre-screening and affordability assessments, the provision of certain information (such as your full name, contact details, salary and affordability information) is mandatory: if relevant data is not provided, then we will not be able to process your enquiry, progress your application or enter into a tenancy agreement with you. The provision of all other information is optional; however, failure to provide certain optional information may limit our ability to tailor our services to your requirements or to contact you with relevant property updates.

There are instances where we have a legitimate interest to use your data. Our legitimate interest will vary depending on what we are using your data for, and we explain above what the interest is and how it relates to the processing operations that we are carrying out. Where we process personal data on the basis of a legitimate interest, then – as required by data protection law – we have carried out a balancing test to document our interests, to consider what the impact of the processing will be on individuals and to determine whether individuals' interests outweigh our interests in the processing taking place. In the UK, we do not need to conduct a balancing test if we process personal data for a "recognised legitimate interest. You can obtain more information about this balancing test by using the contact details at the end of the notice.

3. How does Four Corners share your personal data?

We share your data with the following categories of recipients:

Data Category	Category of Recipient	Why?
All relevant data	Third party service providers	We employ other companies and individuals to perform functions on our behalf. Examples include our CRM platform provider, our cloud telephony and messaging provider, AI-assisted processing providers, our payment service provider, external tenant referencing provider, providers of IT systems, website hosting, accounting,

		payroll, compliance, legal, audit, insurance and other administrative services
All relevant data	Public authorities, regulators, courts, tribunals, tax authorities, law enforcement bodies, financial institutions or other third parties	To prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime, in accordance with applicable law. In the UK, this is a recognised legitimate interest when we do this to prevent, detect, or investigate a crime.
All relevant data	Professional advisers, auditors, insurers, banks and business partners	Where this is necessary for the operation, administration, financing, audit, insurance or legal protection of Four Corners' business.
Full name, Email address, Telephone number, Pets and Children	Ascend (our current property management partner)	During the current transitional operating phase, Four Corners manages marketing activities and engagement with prospective tenants. Ascend currently manages the leasing process itself, including lead generation, property matching, coordinating viewings, and tenant referencing, except for prospective tenants handled directly by the Four Corners leasing team as this function is progressively insourced. Lease execution and ongoing tenancy administration currently remain with Ascend and will gradually be insourced by Four Corners. Where Ascend handles your leasing process, we transfer your full name, email address, telephone number, and information about pets and children to Ascend to administer the leasing process. Where your application is handled by the Four Corners leasing team and is successful, we transfer this information to Ascend for the purpose of executing your lease and administering your tenancy. Ascend processes this personal data as an independent controller. Please see their privacy notice here: https://ascendproperties.com/privacy-policy.
All relevant data	Prospective Buyer/Seller	In the event of any actual or proposed restructuring, sale, transfer, merger, financing or other transaction relating to Four Corners' business, your details will be disclosed to our advisers and any prospective purchaser's adviser and will be passed to the new owners of the business.

4. Transfer of personal data outside the UK

Some of Four Corners' service providers may process your personal data outside the United Kingdom. Four Corners will ensure that any such transfers are made in accordance with UK GDPR, including by relying on adequacy regulations, the UK International Data Transfer Agreement, the UK Addendum to the EU Standard Contractual Clauses, or another appropriate safeguard where required. Four Corners

intends, where practicable, to select providers that offer UK or EU-hosted storage for recordings and AI-generated outputs, while recognising that limited international processing may occur depending on the selected provider and supporting infrastructure. If you would like further details about international data transfers or wish to obtain a copy of the relevant safeguards, please contact us using the details set out below.

5. How long does Four Corners keep your personal data?

Four Corners retains your personal data for as long as necessary for the purposes for which it was collected, and in accordance with its internal retention guidelines. The table below sets out the applicable retention periods for the main categories of personal data processed by Four Corners. Personal data may be retained for a longer period where this is necessary to comply with legal obligations, resolve disputes, or establish, exercise or defend legal claims.

Category of personal data	Retention period
Prospect records that do not result in a tenancy (excluding salary, affordability information, guarantor information and similar pre-screening information)	18 months following the last meaningful interaction
Salary, affordability information, guarantor information and similar pre-screening information (where the application does not progress)	30 days
Prospect records relating to successful applicants	6 months following transfer to the operational property management (Ascend)
Referencing outcomes (pass/fail)	12 months
Call recordings and AI-generated transcripts	12 months
AI-generated summaries and CRM notes	In accordance with Four Corners' internal CRM retention policy
Marketing preferences	Until you ask us to stop and for a short period after this (to allow us to implement your requests). We also keep a record of the fact that you have asked us not to send you direct marketing or to process your data so that we can respect your request in future.

6. Your privacy rights

You have a number of rights in relation to the processing of your personal data under UK GDPR. Such rights include:

Right	Description
Access	To receive further information on how Four Corners processes your personal data and to receive a copy of the personal data Four Corners holds about you.
Rectification	To request rectification and completion of the personal data Four Corners holds about you.

Erasure	To request erasure of your personal data in certain circumstances
Restriction	To ask that Four Corners restrict the processing of your personal data in certain circumstances.
Data portability	To request that your personal data is transferred to you or to a third party in a structured, commonly used and machine-readable format, where technically feasible.
Objection	To object to Four Corners' processing of your personal data where we rely on our legitimate interests (or those of a third party), including processing for direct marketing purposes. Where you object, we will cease processing your personal data unless the processing is based on compelling legitimate grounds or is needed for the establishment, exercise or defence of legal claims.

Please note that these rights are subject to conditions and limitations under applicable law. For example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law or have compelling legitimate interests to keep.

If you would like to exercise your rights, please contact Four Corners using the details set out below.

Wherever we rely on your consent, you have the right to withdraw that consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal. We may however have other legal grounds for processing your data for other purposes, such as those set out above.

In some cases, we are able to send you direct marketing without your consent, where we rely on our legitimate interests. You have an absolute right to opt-out of direct marketing, or profiling we carry out for direct marketing, at any time. You can do this by following the instructions in the communication where this is an electronic message, or by contacting us using at marketing@fourcorners.com.

If you have unresolved concerns, you have the right make a complaint to us and to the Information Commissioner's Office (ico.org.uk).

7. Changes to this privacy notice

Four Corners may change this privacy notice from time to time, when deemed necessary or appropriate to ensure Four Corners' compliance with the UK GDPR, the Data Protection Act 2018 and other applicable UK data privacy law. The latest version will always be available on our website, and we will update the date at the bottom of this notice when we do so. We will notify you directly of any significant changes if we hold contact details for you.

8. Contact information

Please contact Four Corners if you have any questions, comments or would like to exercise your rights, including the right to withdraw your consent. You can contact us at dataprotection@fourcorners.com.

This Privacy Notice was last updated: September 2026