

Privacy Notice For Tenants and Prospective Tenants of Kennedy Wilson Europe Properties

Last updated: December 2025

I. Introduction

Kennedy Wilson Europe (“**KW**”, “**Kennedy Wilson**”, “**we**”, “**us**” or “**our**”) respects the privacy rights of individuals and is committed to handling personal information responsibly and in accordance with applicable law, including the EU General Data Protection Regulation (“**EU GDPR**”) and the UK General Data Protection Regulation (“**UK GDPR**”).

This Notice explains how we collect, use, and disclose personal information about:

- **Prospective tenants** who enquire about or apply for a tenancy; and
- **Tenants**, authorised occupants, and, where applicable, household members,

in relation to properties owned, operated, or managed by Kennedy Wilson Europe or its affiliates (the “**Properties**”) and associated services, amenities, digital platforms, and communications (together, the “**Services**”).

The owner of the relevant Property and certain Kennedy Wilson group companies (including Kennedy Wilson Europe) act as data controllers of your personal information. Managing agents typically also act as controllers for day-to-day tenancy management (and will have their own separate privacy notices that set out how they handle your personal information), and Kennedy Wilson Europe acts as a controller for asset management and oversight as further described in this Notice.

2. Contact Details

If you have any questions about this Notice, would like a list of Kennedy Wilson group companies that may process your personal information, or wish to exercise your privacy rights, please contact us at:

- Via the “Contact Us” page at www.kennedywilson.com; or
- By email at privacy@kennedywilson.com.

3. Personal Information We Collect and Process

We may collect personal information about you directly, indirectly, and automatically when you:

- Enquire about a potential tenancy;
- Submit a tenancy application or enter into a lease;
- Communicate with us or with the managing agent;
- Use websites, portals, or mobile applications relating to the Property; or
- Use amenities or services provided in connection with your tenancy.

We collect personal information from the following sources:

- **Information you provide directly** – For example, by filling in tenancy enquiry or application forms, signing a lease, interacting with us or the managing agent in person, by email, phone, post, or through websites or apps relating to the Property.
- **Information collected automatically** – When you use Property websites or apps, we may collect device and usage information (as described above), and in some cases geolocation data where you have consented to collection via your device settings.
- **CCTV and access control systems** – CCTV cameras and access control infrastructure (e.g., keycard systems, car park gates) may capture images and registration details where such systems are in place.
- **Information from the managing agent or other third parties** – We may receive information from managing agents, property managers, credit reference agencies, identity verification providers, payment service providers, and other service providers involved in your tenancy or application.

The table below describes the categories of personal data we collect from and about you in relation to our Properties and Services

Personal Data Description	Source
Basic information – Title, first name, middle name, last name, date of birth, postal address, email address, phone number(s), nationality.	Directly from you Indirectly from you Third parties
Tenancy information – Tenant details, key holder names, reasons for moving, emergency contacts, pet details, car ownership and registration details, details of defects or maintenance issues you report, incident reports or descriptions, requests for replacement keys/fobs/parking cards, and enquiries about your tenancy.	Directly from you Indirectly from you Third parties
National identifiers and immigration information – National ID/passport number, nationality, immigration/visa status, social security/PPS or national insurance number, driver's licence details, where required by law (for example, right-to-rent checks, anti-money laundering, or other regulatory requirements).	Directly from you Indirectly from you Third parties
Financial information – Salary/income, employment verification, bank account details, rental amounts owing/paid/in arrears, deposits, service charges, and related financial history.	Directly from you Indirectly from you Third parties
Employment information – Country, employer, job title, employment status and duration, employer's address and telephone number, and prior employers.	Directly from you Indirectly from you Third parties
Background check information – References from employers or landlords, prior leasing history, prior residential addresses, creditworthiness/financial history, information regarding dependents or household members (including whether children will reside at the Property), and pet ownership.	Directly from you Indirectly from you Third parties

Online account and portal information – Usernames and passwords for portals or apps; usage logs; bookings and reservations (e.g., amenities, meeting rooms); building access events; package delivery preferences and notifications; and survey responses.	Directly from you Indirectly from you Third parties
CCTV and access control data – Images and video from CCTV cameras located in and around common areas at KW premises or Properties; building access logs and car park entry/exit records, including car registration details.	Indirectly from you Third parties
Device and website/app usage information – Device identifiers (e.g., IP address, device ID), browser type, operating system, pages viewed, features used, and timestamps when you access Property websites or portals.	Indirectly from you
Geolocation data – Where you enable location services on a smartphone or other device to access Property-related websites or apps.	Indirectly from you

You are not obliged to provide the personal information listed above; however, if you choose not to provide information that is necessary to assess eligibility for tenancy, comply with legal requirements, or provide certain Services, we may be unable to proceed with your application or provide those Services.

5. How We Use Your Personal Information (Our Purposes) and Legal Bases

The following table provides details on our purposes for processing your personal data and the related legal bases. The legal basis under which your personal data is processed will depend on the data concerned and the specific context in which we use it.

Purpose/Activity	Type of personal data	Lawful basis for processing including basis of legitimate interest

<p>To manage your tenancy or prospective tenancy</p> <ul style="list-style-type: none"> Assessing your suitability and eligibility for tenancy; Processing tenancy applications and performing credit, affordability, and reference checks; Entering into and administering your lease, including rent collection, deposit handling, and service charge billing; Managing repairs, maintenance, and access to the Property; Providing tenant services and amenities (including concierge, booking systems, event notifications, and building communications). 	<p>Basic Information</p> <p>Tenancy Information</p> <p>National Identifiers and immigration information</p> <p>Financial Information</p> <p>Employment Information</p> <p>Background Check Information</p> <p>Online Account and Portal Information</p>	<ul style="list-style-type: none"> Performance of a contract with you or steps prior to entering into a contract. Compliance with legal obligations. Otherwise, as necessary for our legitimate interests (to ensure the proper management of Properties and Services).
<p>To communicate with you and provide information you request</p> <ul style="list-style-type: none"> Responding to enquiries or complaints; Providing information about the Property, works, or changes to services; Providing information that may enhance your tenancy (for example, amenities, events, or building updates). 	<p>Basic Information</p> <p>Tenancy Information</p> <p>Online Account and Portal Information</p>	<ul style="list-style-type: none"> Performance of a contract with you. Consent (where required under applicable law). Otherwise, as necessary for our legitimate interests (effective communication with tenants and prospective tenants).

<p>To provide marketing communications (where permitted)</p> <ul style="list-style-type: none"> Providing information about similar properties, services, or offerings that may be of interest (for example, other Kennedy Wilson properties or services), in accordance with your preferences. 	<p>Basic Information Online Account and Portal Information Device and Website/App Usage Information Geolocation data</p>	<ul style="list-style-type: none"> Consent (where required under applicable law). Otherwise our legitimate interests (to promote our products and services and to use insights to improve or develop marketing activities).
<p>Manage our use of tracking technologies such as cookies</p> <ul style="list-style-type: none"> enabling you to manage your cookie preferences conduct analysis to learn about our Property websites and Apps; operating and improving Property-related websites, portals, and apps. 	<p>Basic Information Online Account and Portal Information Device and Website/App Usage Information Geolocation data</p>	<ul style="list-style-type: none"> Consent (where required under applicable law – see cookie consent tool on our website). Otherwise (for strictly necessary cookies) our legitimate interests to operate, provide and improve our business including our Property websites and apps or use the insights to improve or develop marketing activities and promote our products and services.

<p>To comply with legal and regulatory obligations</p> <ul style="list-style-type: none"> Conducting right-to-rent, identity, anti-money laundering, and other regulatory checks where required; Maintaining records and documentation required by law; Establishing, exercising, or defending legal claims, including in relation to disputes or enforcement of legal rights. 	<p>Basic Information</p> <p>Tenancy Information</p> <p>National Identifiers and immigration information</p> <p>Financial Information</p> <p>Employment Information</p> <p>Background Check Information</p> <p>Online Account and Portal Information</p> <p>CCTV and Access Control Data</p> <p>Device and Website/App Usage Information</p> <p>Geolocation Data</p>	<ul style="list-style-type: none"> Compliance with legal obligations. Otherwise, our legitimate interests (establishing, exercising, or defending legal claims and to protect our business interests).
<p>For our legitimate business interests</p> <ul style="list-style-type: none"> Managing and improving Properties, Services, and tenant experience; Performing analytics and reporting for asset management, budgeting, and forecasting (including aggregated and anonymised analyses); Monitoring compliance with building rules and policies; Investigating and responding to incidents, accidents, or security issues. 		<ul style="list-style-type: none"> Compliance with legal obligations. Consent (where required under applicable law – see cookie consent tool on our website). Otherwise, our legitimate interests (efficient operation of Properties and Services, security, and service improvement).

<p>CCTV and security: Where CCTV systems are in place, we use footage for:</p> <ul style="list-style-type: none"> • Keeping staff, tenants, visitors, and property safe and secure; • Ensuring compliance with health and safety procedures; • Detecting and preventing crime and assisting law enforcement with investigations; • Supporting insurance claims and incident investigations. 		<ul style="list-style-type: none"> • Legitimate interests (security and safety of people and property); compliance with legal obligations; protection of vital interests in limited cases. Notices are displayed where CCTV is in operation.
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6. Sharing Your Personal Information

We share your personal information with the following category of recipients:

- **Kennedy Wilson group companies, owners, and affiliates** – For purposes consistent with this Notice, including asset management, reporting, and oversight.
- **Managing agents and property managers** – Who manage Properties on our behalf and provide services such as maintenance, repairs, inspections, amenity management, and tenant communications.
- **Third-party service providers, suppliers, and partners** – Including payment processors, IT and hosting providers, identity verification providers, credit reference agencies, maintenance contractors, security providers, building amenity vendors, and concierge or delivery service providers.
- **Utility companies and other suppliers** – As necessary to arrange utilities and related services for the Property.
- **Credit or reference providers and debt collection companies** – For credit checks, rent recovery, and enforcement of contractual rights.
- **Law enforcement, regulators, government authorities, and courts** – Where we believe disclosure is necessary to comply with law or regulation, protect rights and safety, prevent fraud, or support legal proceedings.
- **Potential buyers, investors, financiers, or replacement owners or operators** – In connection with sale, financing, or restructuring of Properties or related businesses, so they can evaluate and complete the transaction and subsequently manage the Property.
- **Any other person with your consent.**

We do not sell your personal information.

7. International Transfers

As we operate internationally, in some cases, where your personal data is transferred to another Kennedy Wilson company or third party, it is processed in countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country

(and, in some cases, may not be as protective).

Specifically, our group companies are based in the UK, Ireland and the USA. Our third-party service providers and partners operate are primarily located within the EEA and UK but may also operate around the world. This means that when we collect your personal data we will process it in any of these countries.

Where we transfer your personal data to countries and territories outside of the European Economic Area and the UK, which have been formally recognised as providing an adequate level of protection for personal data, we rely on the relevant “adequacy decisions” from the European Commission and “adequacy regulations” (data bridges) from the Secretary of State in the UK. For example, we are able to transfer personal data between the UK and Ireland based offices on the basis of the mutual EU and UK adequacy decisions.

Where the transfer is not subject to an adequacy decision or regulations, we have taken appropriate safeguards to ensure that your personal data will remain protected in accordance with this Notice and applicable laws. The safeguards we use to transfer personal data in the case of our group companies are the European Commission’s Standard Contractual Clauses as issued on 4 June 2021 under Article 46(2) for controller to controller, transfers, including the UK Addendum, permitted under Article 46(2) of the UK GDPR for the transfer of data originating in the UK.

The safeguards we use to transfer personal data are in case of our in case of our third party service providers and partners, are the European Commission’s Standard Contractual Clauses as issued on 4 June 2021 under Article 46(2) for controller to controller and controller to processor transfers, including the UK Addendum permitted under Article 46(2) of the UK GDPR for the transfer of data originating in the UK.

8. Security and Data Retention

We use administrative, technical, and physical safeguards designed to protect personal information under our control against accidental, unlawful, or unauthorized destruction, loss, alteration, access, disclosure, or use. These measures include access controls, system monitoring, and other security practices.

However, no method of transmission or storage is completely secure. We cannot guarantee absolute security of the Services or of your information.

We retain your personal information for as long as necessary to fulfil the purposes described in this Notice. For example:

- For the duration of your tenancy or prospective tenancy;
- As necessary to manage and support your relationship with us and the Property;
- As required by legal, tax, and accounting obligations; and
- For the period necessary to establish, exercise, or defend legal claims.

When personal information is no longer required, we will delete or anonymise it, or, if this is not possible (for example, because it is stored in backup archives), we will securely store and isolate it from further processing until deletion is possible.

9. Your Rights and Choices

You have the **right to opt out of marketing communications** at any time. You can do this by:

- Updating your preferences via any online tenant portal (if available);
- Clicking the “unsubscribe” link in marketing emails; or
- Emailing us at privacy@kennedywilson.com

In addition, under the EU GDPR and UK GDPR, you may be entitled to:

- **Access** – Request a copy of the personal information we hold about you.
- **Rectification** – Have any inaccurate or incomplete personal information corrected or completed.
- **Erasure** – Request deletion of personal information that we no longer need for the

purposes described above, where you withdraw consent and there is no other legal basis for processing, where the information has been unlawfully processed, or where we are required by law to delete it.

- **Restriction** – Request that we restrict processing in certain circumstances (for example, while we verify accuracy or consider an objection).
- **Objection** – Object to processing based on our legitimate interests, where we cannot demonstrate compelling legitimate grounds that override your interests, rights, and freedoms, or where we process your data for direct marketing.
- **Portability** – Request certain personal data in a structured, commonly used, machine-readable format and transmit it to another controller, where technically feasible and where the legal basis is consent or performance of a contract.
- **Withdraw consent** – Where processing is based on consent, withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal data conducted in reliance on lawful processing grounds other than consent.

To exercise your rights, please contact us at privacy@kennedywilson.com and clearly describe your request. We may need to verify your identity before fulfilling your request and will respond in accordance with applicable data protection laws.

You also have the right to lodge a complaint with your local data protection authority if you believe our processing of your personal information infringes applicable law. Contact details for EEA supervisory authorities are available [here](#), and for the UK the relevant authority is the **Information Commissioner's Office (ICO)** available [here](#). Certain supervisory authorities will require that you exhaust our own internal complaints process before looking into your complaint. We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

10. Cookies and Similar Technologies (Tenant Portals and Apps)

If you use a residential portal website or mobile app provided in connection with your tenancy, we may use cookies and similar technologies within those platforms. Additional information is provided in the **Kennedy Wilson Cookie Notice** available on the portal or app. Where required by law (for example, in the EEA/UK), we will obtain your consent before using non-essential cookies or similar tracking technologies, and you can manage your preferences via the relevant tools in the portal or app.

11. Changes to This Notice

We may update this Notice from time to time to reflect changes to our practices, technologies, or legal requirements. Any changes will be posted or otherwise notified to you in a manner consistent with applicable data protection law (for example, via the tenant portal, email, or other direct communication).