

# Abri Stakeholder Privacy Notice

v.2.1 24 November 2022

**Next review date : 24 November 2024**

**Abri** is committed to protecting your privacy and takes its responsibilities regarding the security of your information very seriously. This Privacy Notice sets out how we will use and protect all information we collect from you in accordance with Data Protection Legislation (as defined below). This notice applies to those of our stakeholders who engage with us and provide valuable support in assisting us to meet our business aims. Whilst we consider our employees, customers and contractors as key stakeholders, the particular nature of our relationship with these individuals means that we have developed stand-alone Privacy Notices tailored to their needs which are accessible through our website [abri.co.uk](http://abri.co.uk).

We process stakeholder personal data in accordance with relevant data protection legislation (notably the UK General Data Protection Regulation 2020 and the Data Protection Act 2018) , as well as this Privacy Notice and our General Data Protection Policy. In doing so we rely on the fact that it is reasonably necessary and in our legitimate interests to encourage and facilitate stakeholder involvement in our business. In any case where we need your consent as a stakeholder to process your information, we will ask you clearly for that consent and provide the means for you to easily withdraw that consent at any time.

## **Who we are**

When we say 'we' or 'us' in this policy we're generally referring to Abri Group Limited and all of its subsidiaries (collectively 'Abri') which act as Data Controllers for processing personal data, including in some instances your personal information.

## **What sorts of information do we collect and hold**

Abri collects and processes a range of data about you as a stakeholder. This includes:

- Names and titles
- Age
- Addresses and other contact information (telephone, email and social media accounts)
- Records of your interaction with us, eg attendance at our events
- Your opinions or statements made about particular matters that are of importance to us
- If you have signalled your interest in particular matters that affect our business

- Biographical information
- Photos (always with your prior consent)
- Your IP address (when you visit our website and subject to our cookie policy available through our website)

We also process classes of information deemed sensitive that might include your ethnicity, any disabilities you might have and other information covered by Equalities legislation.

### **Closed Circuit Television (CCTV)**

The CCTV systems installed in certain Abri buildings are for safety and crime prevention only. Clearly visible notices are provided where CCTV is used. The reception area and interview rooms at Abri's corporate premises have CCTV and in some instances voice recording facilities. Voice recording will never be activated without the prior knowledge of those who are affected by it.

CCTV images can be shared with lawyers, police and other agencies working to prevent or investigate crime, improve public safety or resolve antisocial behaviour.

CCTV images are retained for up to eight weeks or, where applicable until investigation of incidents and any consequent enforcement action is complete. Images that are no longer required will be destroyed.

Abri has a CCTV policy which is available on request.

### **How we collect information about you**

We collect information about you throughout our relationship. This includes meetings, events, online and digital communications and telephone conversations. If you call our switchboard, the conversation may be recorded for the purposes of monitoring service quality.

In some cases, Abri may collect information about you from third parties, such as the media, professional bodies, other housing associations, other stakeholders or employees of Abri who know you, and are aware of your experience and potential willingness to get involved in activities which are supportive of our corporate aims. We only collect information that is necessary to facilitate our engagement with you.

### **How do we use your information?**

Our overriding purpose in collecting and using personal information is to provide social and affordable housing and related services to our customers. To meet this aim we need to engage with stakeholders who have the right kind of skills, knowledge, experience and influence to help us achieve our objectives. Engagement requires us to conduct a wide range of activities that may involve your personal information, including:

- getting in touch, via phone, email, social media or post (where appropriate, giving you the chance to opt out whenever you choose)
- preparing internal management reports
- commissioning works and/or services from third parties
- organising meetings and events
- briefing the press
- producing promotional materials
- holding archive materials that will allow us to compile histories of our organisation

### **Who we might share your data with**

We will only share your personal information in the following ways:

- with those Abri colleagues who need to see it in order to carry out their roles;
- when you have agreed to feature in our promotional material or press releases, with the intended recipients of that material;
- when you have agreed to be cited in other briefing documents, with the intended recipients of those documents;
- if we are compelled to do so by law, or permitted to do so when defending or bringing legal claims, with solicitors, or with the police when investigating any offence; and/or
- where there is clear risk to health or safety, with any agency that is charged with protecting the interests or vulnerable adults or children.

### **How long do we keep your information for?**

We will always retain your information in accordance with the law and regulation and never retain your information for longer than is necessary to meet the purposes we have described. In general we will keep your information for no longer than 3 years after our working relationship with you has come to an end although if we have any photos taken with your consent for promotional or general communication purposes we may hold them in archive for a longer period, although we will contact you again to seek further consent for their publication once they are more than 3 years old.

### **Back-Ups**

All our data is backed up regularly as part of our measures to ensure compliance with your right to have your data kept secure and protected against any threat to its integrity. Data held in our back-ups may exceed the retention period set for the same data when it is part of our live systems. This is because our back-ups are kept for 7 years, no matter what the particular retention period applicable to individual records held within them. However, acting in accordance with ICO advice, we believe that these comply with our legal obligations towards our customers because:

- while held as back-up this data is deemed 'beyond use'; and
- if the back-up files are ever restored to live systems (eg. in the case of a cyber incident affecting the integrity of our live records) we will undertake sanitization of the restored data to delete from it any data which is either beyond its retention period, or should be deleted because it formed part of a data subject record that was erased under the customer's right of erasure (see below).

### **Information security**

Abri takes the security of your data seriously. It has internal policies, controls (electronic, physical and managerial) and procedures in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties. These security measures include:

- Limiting access to our building to those we believe are entitled to be there (by the use of key card passes and ID Badges); and

- Implementing access controls to our technology and devices, such as firewalls, ID verification, and encryption.

### **International Transfers**

It may sometimes be necessary to transfer personal information overseas for the purposes set out in this notice. Where this is necessary this may be to countries or territories around the world other than the UK. If we do this your personal information will continue to be subject to appropriate safeguards as set out in Data Protection Legislation.

### **Links to other websites and use of digital platforms**

Abri will sometimes provide you with links to other websites, but these websites are not under our control. We will not be liable to you for any issues arising in connection with their use of your information, the website content or the services offered to you by these websites. Therefore we would advise you to consult the privacy policy and terms and conditions on each website to see how they may process your information.

### **Your rights**

#### ***Access and correction of your personal information***

You have the right to a copy of the personal information that we hold about you. This is often called a subject access request (SAR). There are limits to this right such as where the disclosure of the information would unreasonably impact the data protection rights of a third party.

Before providing personal information to you or another person on your behalf, we may ask for proof of identity and sufficient information about your interactions with us so that we can locate your personal information. A SAR request can be submitted to us at any time using the methods set out in the '**Contact Us**' section.

If any of the personal information we hold about you is inaccurate or out of date, you can request that it be corrected or updated. Or in some cases you can amend it yourself by logging in to the contractor portal.

#### ***Right to object to our processing of your data***

If we rely on our legitimate interests as a basis for processing your personal data, you have the right to object to our continued use of that information, unless we can show that there is a compelling reason for the processing to continue or we are bringing or defending a legal claim.

#### ***Right to erasure of your personal information***

You have the right to ask us to erase your personal information if:

- there is no longer a lawful reason for us to use it (including when you have withdrawn consent);
- our original purpose in processing that data no longer exists, and no other purpose has replaced it;
- you have objected to our processing of the information and there is no overriding legitimate interest for us to continue the processing; or

- the personal information has to be erased in order to comply with a legal obligation

### ***Right to data portability***

You have the right to receive and reuse your personal information, which you have provided to us, for your own purposes across different services. This applies where the processing is based on your consent or for the performance of a contract and when processing is carried out by automated means.

### ***Consent***

In some circumstances your consent is the legal basis for us using your information. Consent must be freely given by you for a specific purpose; we will always clearly explain why we need the information we have asked you for. Consent must be clearly given; so we never assume your consent, or use pre-ticked boxes to communicate consent.

You have the right to change your mind at any time and withdraw your consent. The consequence might be that we can't do certain things for you. Consent can be withdrawn at any time using the contact methods set out below.

### **Contact us**

If you would like to exercise any of these rights or have a question about this policy or the way your personal information is used please contact Abri's Data Protection Officer by one of the following means:

**By emailing:** [abridataprotection@abri.co.uk](mailto:abridataprotection@abri.co.uk)

**By Phone:** via our **Customer Experience Service Centre:**

- using telephone number 0300 123 1567

**By Post:** Data Protection Officer, Abri Group Ltd., Lupin Way, Yeovil, Somerset BA21 8WN.

### ***Lodge a Complaint via our Complaints team***

You can lodge a complaint about the handling of your personal data at any time by calling our Customer Service Centre on the phone numbers given above; or by emailing [dataprotection@abri.co.uk](mailto:dataprotection@abri.co.uk).

### ***Lodge a Complaint with the Supervisory Authority***

You have the right to lodge a complaint to the Information Commissioner's Office (UK's Supervisory Authority) go to [www.ico.org.uk](http://www.ico.org.uk) or ring 0303 123 1113 to find out more.

## Abri Stakeholder Privacy Notice