

Abri Use of Intratone Privacy Notice

5 August 2024 V 1.0

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 (Abri) will use and protect the information we collect from you as our customer who uses the Intratone residential building access control system.

Abri processes personal data in accordance with all relevant data protection legislation (notably the UK General Data Protection Regulation 2020 and the Data Protection Act 2018), as further elaborated by Abri's Data Protection Policy and this Privacy Notice.

Who we are

When we say 'we' or 'us' in this policy we're generally referring to Abri Group Limited and those of its subsidiaries (collectively 'Abri') which act as Data Controllers for processing personal data in the field of building security facilitated by the Intratone system and other related matters. For more information about how Abri protects your personal data as one of its customers please go to Abri.co.uk/privacy.

What sorts of information do we collect and process for the use of the Intratone system

Abri collects and processes the following data to support the use of the Intratone system:

- Customer Name (for account set-up)
- Customer Address (for account set-up)
- Flat number for fob usage (optional for fob usage)
- Email address (for account set-up in respect of the Intratone app only)
- Mobile telephone number (for intercom system only)
- Fob serial number allocated to address
- Date/time of usage of fob to access door
- Date/time of call to mobile phone for intercom based access

- Make and model of mobile phone used to take call
- Door from which call was made to customer's mobile phone
- Whether call was answered or dismissed

No audio or visual record of the visitor's call to the customer's mobile is made.

Fob and Intercom Access Control System

The fob-based Intratone access control system is installed in certain Abri residential buildings to provide secure property access to residents. The fob allows access when put in contact with a proximity reader.

The intercom access control systems is installed in certain Abri residential buildings to allow residents to use their mobile phones to monitor visitors and provide them with remotely controlled access to the communal area of the building.

The technology used to facilitate the fob system is GSM signal strength. The system needs the GSM signal to communicate the fob serial numbers to the Intratone portal via the GSM module.

GSM signal strength is also used for the intercom system which communicates with the Intratone portal via the GSM module. Customers have an option to download the Intratone app available on Google Play Store or Apple Store. This app allows the customer to use the intercom camera to monitor visitors before deciding whether to grant entry remotely via their smartphone or tablet. If the customer does not install the app, they can still receive calls on their mobile phone and speak with visitors before deciding whether to grant entry.

How we collect information

We collect information to support the use of Intratone when:

- you enrol as a new user of the system
- you report issues with the fobs or intercom system
- the Intratone system is being installed and your account setup
- the fob is used to access the building and the intercom is used to manage visitor access

How do we use your information

We only collect information that is necessary to enable us to provide the Intratone door access system and to improve the quality and efficiency of the service.

How is your information stored.

The Intratone system database is hosted in France by Cogelec SA and by the back up provider, OVH. Abri has a portal for access to this system.

Who will have access to your information

Where it is necessary to share information internally within Abri or externally with our contractors (data processors) or with other agencies (eg. after a valid request has been made by one of the emergency services), we will always comply with all aspects of Data Protection legislation.

The data we hold with regard to your use of the Intratone system is accessible only to a very limited number of Abri colleagues and external contractors:

- Abri's contractors (all appointed as data processors) who are required to install and maintain the system on our behalf
- Cogelec SA and its UK subsidiary, Intratone UK Ltd, which offers technical support to Abri

Logs are kept to monitor use of the portal by Abri colleagues and our authorised contractors.

Where necessary, and following a valid request, we may share information with emergency services, and with the police where a criminal investigation is being undertaken that involves an enquiry into the use of the door secured by Abri's Intratone system.

Lawful Grounds

We collect, use and occasionally share your information for reasons which are recognised as lawful. These include:

1. the legitimate interests (art. 6.1.f UK GDPR) of Abri in providing a secure door access system to our customers
2. the vital interests of a data subject (art. 6.1.d UK GDPR) in an emergency
3. processing necessary for a task carried out in the public interest (art. 6.1.e UK GDPR)

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 reasonably necessary.

We retain a record of the fob serial number linked to an address for the duration of the customer's residency or the duration of our contract with Intratone, whichever is the shorter.

In respect of fob usage (serial number of fob and dates/times of use), data retention is limited to 3 days. In rare cases where Abri has been advised by the police of security concerns affecting a particular block (eg. where there is evidence of drug dealing or other criminal activity involving the communal areas of the block) Abri may temporarily extend the retention period of data relating to door entry, so that we are able to assist

the police with their investigations and provide to our customers a greater level of security.

In respect of intercom usage (the mobile number and location of entries made, and the times and dates for each block), data retention is limited to 3 days.

In respect of app usage, call logs automatically delete after 7 days.

At the end of the retention period the data is anonymised by use of an automatic script to permanently delete the data.

Back-ups of data will be kept for 6 months by an externally hosted service located in France.

Information security

We take the security of your data seriously. We have internal policies, controls (electronic, physical and managerial) and procedures in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed unlawfully to others, and is only accessed by Abri colleagues and authorised contractors (data processors) in the proper performance of their duties.

Contact us

If you would like to exercise any of your rights as a data subject (for a full explanation of which see Abri.co.uk/privacy) or have a question about this privacy notice 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

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

-by dialling 0300 123 1567

By Post: Data Protection Officer, Abri Group Ltd., Bishopstoke Rd, Eastleigh, Hants SO50 6AD.

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 abridataprotection@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 or ring 0303 123 1113 to find out more.