

Abri Contractor Privacy Notice

V.2.3 16 OCTOBER 2026

Next review due 16/10/2027

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 all our contractors.

As our contractor (hereafter 'you'), we process the data of your staff and directors ('your personal information') in accordance with relevant data protection legislation (notably the UK General Data Protection Regulation and the Data Protection Act 2018), as well as this Privacy Notice and our Data Protection Policy.

Any personal data that relates to our customers which you may process on our behalf is not the subject of this privacy notice but is covered by Abri's Customer and Community Privacy Notice, which is available to view via our website : www.abri.co.uk/privacy

Who we are

When we say 'we' or 'us' in this policy we're generally referring to Abri Group Limited, the Swaythling Housing Society Ltd, Radian Developments Ltd or Yarlinton Homes Ltd (collectively 'Abri') which act as Data Controllers for processing personal data in the Abri group, including in some instances your personal information.

Whichever company within Abri that you have contracted with, this Privacy Notice applies to any processing of your personal information that we undertake as Data Controller.

What sorts of information do we collect and hold

Abri may collect and process a range of data about you, most of which will contain some element of personal data. This includes:

- Full company details name, address, company incorporation dates, date of incorporation, type of organisation
- Disclosures – confirmation whether directors/partner are/have been associated with Abri
- Financial details – bank or building society
- Confirmation of any court action or criminal activity, via DBS checks
- Health & safety information
- Compliance against legislation (E&D, H&S, Modern day slavery etc)
- Insurance details
- References
- Names, Email addresses and contact telephone numbers

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 one calendar month or, where applicable until enforcement action is complete. Images that are no longer required will be destroyed.

Abri has a CCTV policy which can be accessed via our website – Abri.co.uk

How we collect information about you

We collect information about you throughout our relationship. This includes;

- When you submit a tender
- When you sign a contract or agreement
- Through ongoing contact with you during the term of the contract
- Submission of quotes
- When you access services by logging into our website or via a contractor portal
- Recording calls to & from us
- CCTV footage

In some cases, Abri may collect information about you from third parties, such as credit referencing agencies, professional and trade bodies. We only collect information that is reasonably necessary for us to contract for the services with you, perform or receive the services from you, to carry out the transaction you have requested and to ensure good governance of the transactions between us.

Why we use your information

We process your personal information in general so as to assist us in running our business efficiently and in compliance with our legal and regulatory obligations. More particularly we may process your personal information for one or more of the following purposes:

- To perform and satisfy our due diligence procedures
- To get in touch, via phone, email or post
- To commission works and/or services
- To make payments when they fall due
- To comply with our legal obligations
- To periodically survey your opinions

Who we might share your data with

In order to effectively carry out our services and critical activities, parts of your personal information may be accessible to Abri colleagues whose jobs require them to have access to it. We sometimes need to share personal information with other organisations. Where this is necessary, we will comply with all aspects of data protection legislation. What follows is a description of the types of organisations with which we may need to share some of your personal information, either because we have a legal obligation to do so, we are permitted to do so by data protection legislation, and/or because it is within our legitimate interests for the purposes of running our business. Only where we wish to share your personal information with the press or media would we first seek your consent.

- Other Contractors
- Local authorities/departments (including Adult and Children's Social Services)
- Emergency services
- Professional bodies
- The Health and Safety Executive
- Suppliers and service providers
- Other landlords
- Utilities companies
- Occupational Therapists
- Courts and tribunals
- The Police
- Fire Services
- Housing regulators
- Central government
- HMRC
- Auditors
- IT service providers (including this that provide storage and back-up services)
- Debt collection agencies
- Solicitors
- Credit reference agencies
- Specialist survey agencies
- Press and the media (with your prior consent)

In some cases these third parties are simply carrying out work on our behalf and to do this they need certain personal information of contractors. In such cases we appoint them to do this under contracts that contain data processing clauses which safeguard the data rights of our contractors.

National Fraud Initiative (NFI)

We are required to take all reasonable measures to protect our funds, resources, property and assets from fraud, theft, damage and misuse.

We participate in the NFI data matching exercise carried out by the Department of Work and Pensions (DWP). Our participation in the NFI will assist in the prevention and detection of fraud against Abri and organisations within the public sector. We participate on a voluntary basis (as it is in our legitimate interests) and share particular sets of data with the DWP for matching as set out in the NFI guidance which can be found on the [Gov.uk website](#).

Data matching involves comparing sets of data, such as the tenancy, employment or contractor data, against other records held by the same or another body to see how far they match. The data is usually personal information. The data matching allows potentially fraudulent activities to be identified.

Where a match is found it may indicate that there is an inconsistency that requires further investigation.

The processing of data by the DWP in a data matching exercise is carried in accordance with Part 6 of the Local Audit and Accountability Act 2014. It does not require the consent of the individuals concerned.

Data matching by the DWP is subject to a Code of Practice. This can be found on the [Gov.uk website](https://www.gov.uk).

How long do we keep your information for?

We will always retain your information in accordance with law and regulation and never retain your information for longer than is necessary.

Our current Data Retention Policy determines that contract tendering documents are held for 6 years after the end of the contract, therefore any personal information contained within them will be held for that period. The only exception to this is where there is an ongoing legal dispute over matters arising under the contract in which case the information will be held until the dispute is finally resolved.

CCTV footage is usually kept for no more than 8 weeks, unless we have been asked by the police, or by others who have an interest in viewing the footage for the purposes of a legal or insurance claim, to keep the footage for longer so that it can potentially be used as evidence in the determination of a claim. In this case we will retain a copy of the footage until the police prosecution, legal or insurance claim has concluded.

Other personal information will also be retained for no longer than the length of your contract plus 6 years.

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 contractors 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 customer record that was erased under the contractor's right of erasure (see below).

Information security

Abri takes the security of your personal information 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)
- 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.

In addition, when using other digital platforms such as Facebook and social networks please remember it is your responsibility to set appropriate settings on your accounts so you are comfortable with how your information is used and shared on them.

Your rights

As a contractor and data subject under data protection law, you have certain rights as summarised below. In general we will treat any requests to action these rights with respect and with due regard to the need to carry them out without delay, and within a 30 day period from the request.

Your request can be submitted by email to abridataprotection@abri.co.uk. To find out how else you can contact us, please visit our website.

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 stop or limit our processing of your data

You have the rights, in certain circumstances, to limit or object to our use of your personal information. Also you have the right to ask us to delete your personal information if there is no longer a lawful reason for us to use it.

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

We can refuse to erase your personal information in certain circumstances, including, when:

- we have an overriding legitimate interest in continuing to process it;
- we have to comply with a legal obligation that requires us to continue processing that information
- we need to do so as part of a task we are carrying out in the public interest; or
- we need the information as part of a legal claim that we are bringing or defending

If we proceed with an erasure request, having considered the factors set out above, we will delete the data from our live-systems and from any hard-copy filing systems we use without delay. If we have appointed data processors to handle any of your data that needs to be deleted, we will contact them and ensure that they too delete the affected data. In respect of data held on our back-ups, please see the section above.

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 emailing: abridataprotection@abri.co.uk

Making a Data Protection Complaint

If you are concerned about how we have handled your personal information, you have the right to make a data protection complaint directly to Abri. You can lodge a complaint about the handling of your data at any time by calling our Customer Service Centre on the phone numbers given above, by post, through the customer portal or by emailing abridataprotection@abri.co.uk.

We will acknowledge receipt of your complaint within the timescales required by law and will investigate and respond without undue delay. We may contact you for further information where necessary to understand or investigate your concerns.

We will inform you of the outcome of our investigation and any action that we propose to take.

If you remain dissatisfied after we have responded to your data protection complaint, you may refer the matter to the Information Commissioner (ICO), which is the UK's independent regulator for data protection. You can visit www.ico.org.uk or ring 0303 123 1113 to find out more.