



## Contractors/Suppliers Privacy Notice

1. As your client, the ateb Group (including Mill Bay Homes and West Wales Care & Repair) to be known as “the Group”) is required to retain and process information about you for both financial and compliancy purposes.

The information we hold and process will be used for our management and administrative use only. We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately during the tender evaluation and contract management process.

This includes using information to enable us to ensure your tender bid is compliant with both our internal and legal requirements. If you do not provide this data, we may be unable in some circumstances to comply with our obligations and we will tell you about the implications of that decision.

2. Your data will only be processed if we have a lawful ground to do so. This includes using information to enable us to comply with the contract between us, to comply with any legal requirements, pursue the legitimate interests of the Group and protect our legal position in the event of legal proceedings.
3. It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

### Data protection principles

4. We will comply with data protection law, which says that the personal information we hold about you must be:
  - a. Used lawfully, fairly and in a transparent way.
  - b. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
  - c. Relevant to the purposes we have told you about and limited only to those purposes.
  - d. Accurate and kept up to date.
  - e. Kept only as long as necessary for the purposes we have told you about.
  - f. Kept securely.

### What information we collect

5. The type of information we hold includes:

- your tender qualification response and references
  - documentation relating to you, for example, training certificates and qualifications, I.D. documents e.g. Gas Safe Cards
  - contact and emergency contact details
  - photographs of you taking during work/events associated with work
  - CCTV images of you which may be captured on our CCTV systems
  - recordings of external phone calls (making and receiving)
6. The majority of the information we hold will have been provided by you during the tender process and is retained on the secure etenderwales portal (which has its own privacy notice to which you should refer in this area).

Some information may be provided from other external sources, such as your financial reports, credit check providers, documents publicly available on Companies House, or your website.

## How the information is used

7. As a Group, we will process your data on the following grounds:
- a. The performance of the contract between us
  - b. The performance of our legal obligations
  - c. Our legitimate interests (as set out below)
  - d. For the purposes of any legal disputes between us; and
  - e. In some circumstances, because it is in the public interest.

The nature of our legitimate interests are:

- Protecting our business by carrying out financial checks on those we work with
- Compliance with relevant accredited body/bodies' requirements to protect our legal position and maintain our standing as an accredited body
- Monitoring equal opportunities
- Providing operational and management information
- Establishing, exercising or defending legal claims
- Promotion of our services and activities

Where our legitimate interests are our sole ground for processing your data, we will never process your data where these interests are overridden by your own interests.

8. We may transfer information about you to other group companies for purposes connected with your contract.

## Use of sensitive information

9. Special categories of particularly sensitive information require higher levels of protection. We need to have further justification for collecting, storing and using this type

of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We may process these special categories of sensitive information in the following circumstances:

- a. In limited circumstances, under contractual obligations
- b. Where we need to carry out our legal obligations.
- c. Where it is needed in the public interest, such as for equal opportunities monitoring.
- d. Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your contractual interests (or someone else's interests), or where you have already made the information public.

## Automated decision-making

10. Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. This is only permitted in limited circumstances. We do not envisage that any decisions will be taken about you using automated means; however, if this position changes, we will notify you of this in writing and let you know what your rights are in this area.

## Data retention

11. Your personal data will usually be stored for a maximum period of 6 years after the end of our contractual relationship; however we do operate different retention periods depending on the type of data we hold. We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
12. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
13. If in the future we intend to process your personal data for a purpose other than that which it was collected we will provide you with information on that purpose and any other relevant information.

## Data security

14. We have in place safeguards including Door security systems for authorized access and internal firewall systems for external access into our housing systems to ensure the security of your data. A copy of the safeguards can be obtained from our Data Protection Officer.

15. Your personal data will be stored for a maximum period of 6 years after the end of your contract; however, we do operate different retention periods depending on the type of data we hold.

## Your rights

16. Under the GDPR and the DPA you have a number of rights with regard to your personal data. You have the right to:
  - a. **Request from us access to your personal data** (commonly known as a “data subject access request”. This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
  - b. **Request correction** of your personal information. This enables you to have any incomplete or inaccurate information we hold about you corrected.
  - c. **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
  - d. **Object to processing** of your personal information where we are only relying on our own legitimate interests (or those of a third party) as our basis for doing so, and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object if we process your personal information for direct marketing purposes.
  - e. **Request the restriction** of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
  - f. **Request the transfer** of your personal information to another party.
17. If you wish to exercise or find out more about any of these rights, including if you wish to make a subject access request, you should contact our Data Protection Officer using the contact details set out at the end of this document. You will not have to pay a fee to access your personal information or to exercise any of the other rights. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively we may refuse to comply with the request in such circumstances. We may also need to request specific information from you to help us confirm your identity and ensure your right to access the information. This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.
18. **Right to withdraw consent:** In the limited circumstances where you may have provided consent for the collection, processing and transfer of your data for specific purposes, you have the right to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn. To withdraw your consent, please contact the Data Protection Officer. Once we have received notification that you have withdrawn your consent, we will no longer process

your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

19. You have the right to lodge a complaint to the Information Commissioners' Office if you believe that we have not complied with the requirements of the GDPR or DPA 18 with regard to your personal data.

### **Identity and contact details of controller and data protection officer**

20. Ateb Group Limited is the controller of data for the purposes of the DPA and GDPR.
21. If you would like to know anything further about how we handle information that we hold about or if you have any concerns as to how your data is processed you can contact our Data Protection Officer – [mydata@atebgroup.co.uk](mailto:mydata@atebgroup.co.uk)