

1. Background

We're Accord Housing Association Ltd, 178 Birmingham Road, West Bromwich, B70 6QG, hereafter referred to as 'Accord'. Accord is a housing, health and social care organisation. This privacy notice describes how Accord collects and uses personal information about you as a prospective, current or former supplier of goods and services to Accord.

Accord is the data controller of your personal data. This means that we are responsible for deciding how we hold and use personal information about you. It is important that you read this notice so that you are aware of how and why we are using such information.

Accord has a Data Protection Officer (DPO), whom you can contact if you have any concerns about this Privacy Notice or concerns in the way we have processed your personal data. You can either contact them by going to the **Contact** section of our website or by writing to us at the above address, marking your letter for the attention of the DPO.

2. What personal data does Accord collect?

In order to work with you as a supplier, we need to collect specific data about you, including where applicable:

- **your name, address and contact details**, including email address and telephone number
- **details of your business**, nature of business, VAT and Company registration details
- **bank details** in order to process payments
- **records of your contact with us**, such as via phone calls to our Customer Services team
- **Health and Safety related data** in relation to work carried out by you
- **personal information we have obtained from Credit Reference Agencies and Fraud Prevention agencies**, including public credit history, financial situation and financial history
- **CCTV images**, these CCTV systems are for the purposes of public and employee safety, and crime prevention or detection. In all such locations, signs are displayed notifying you that CCTV is in operation

3. Where does Accord collect this personal information from?

We'll collect this information from the following general sources:

- from you directly;
- from trusted external sources such as Fraud Prevention and Credit Reference Agencies
- from CCTV installed in Accord premises

4. Why Accord collects your personal data

We use your personal data, including that listed in section 2 above, for the following purposes:

- to complete internal new supplier application and set up processes
- to undertake financial management, audits, planning and reporting within Accord
- to perform our obligations to you under the contract with you for the supply of goods and services, including the processing of payments to you
- to comply with legal and regulatory obligations, including checks on the management of health and safety and details of your workforce and supply chain(s)
- to take legal or administrative action in relation to our supply arrangement with you, including to enforce the terms of the contract and resolve any disputes
- to keep in touch with you regarding future business opportunities

Processing your personal data allows Accord to:

- set you up as a new supplier; either under non-contracted/casual terms or to administer a contract we have entered into with you
- maintain accurate and up-to-date records and contact details
- to act on a legitimate interest in enforcing terms of the contract with you, to resolve disputes with you and as necessary to establish, exercise or defend legal claims
- to ensure we are complying with our responsibilities under the Modern Slavery Act 2015
- to ensure the health and safety of our staff and visitors to our premises
- identify and resolve any inaccuracies in data held by Accord to ensure fair processing of accurate information

5. What are our legal grounds for processing your personal information (including sharing it with others)?

We rely on at least one of the following lawful purposes for using your personal information:

5.1 Where it is in our legitimate interests to do so, such as:

- a. managing the contract that we have entered into with you;
- b. for management and auditing of our business operations
- c. to follow and implement recommended best practice of government and regulatory bodies

5.2 To comply with our legal obligations

5.3 With your **consent or explicit consent**; to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

6. Sharing your personal information

For as long as we have access to your personal information, we may need to share any of it with any of the following to the extent that they need to have access to it in order to perform their role:

- employees within Accord
- our banks and other payment processing service providers who process payments to you
- external credit reference and fraud prevention agencies
- our professional service providers, such as auditors, legal advisors and insurance brokers
- our archive storage providers
- social housing regulators

All personal information is held securely and only accessed by those with a legitimate business interest to access it.

Accord reserves the right to disclose your personal information to other third parties if we have lawful grounds to do so, or under a legal obligation to disclose or share it with them, or in order to establish, exercise or defend our legal rights

7. How does Accord protect personal data?

Accord has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed. We limit access to your personal information to those employees, agents and other third parties who have a legitimate business need to access it. They will only process your personal information on our instructions and they are subject to a duty of confidentiality

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

8. For how long does Accord keep personal data?

We will only retain your personal information for as long as it is necessary to fulfil the purposes we collected it for, including the purposes of satisfying any legal, accounting or reporting requirements. Details of our data retention policy applicable to you are available from our Data Protection Officer and can be requested via the Contact Us section of our website.

In determining the appropriate period for the retention of your personal information, we consider the business needs to do so and the retention periods that are in-line with legal/regulatory requirements or guidelines

9. Your rights under data protection laws

You have a number of rights over the way in which we process your personal data. They are listed below. If you wish to use any of them, we will explain at the time if they are valid or not.

9.1 The right to be informed. This Privacy Notice and subsequent updates to it will let you know exactly how your personal data is used and for what purpose(s).

9.2 The right to request access. You can request a copy of the Personal Data that we hold about you by using one of the following options:

- completing a Subject Access Request form (this is available from our website or can be requested from Accord staff) and emailing it to dsar@accordgroup.org.uk, or;
- writing to us at: *Subject Access Request, Accord Housing Association Ltd, 178 Birmingham Road, West Bromwich B70 6QG.*

Completing a request online or via email will generally be a quicker process than relying upon post. We will generally provide information electronically via password-protected PDF so that it remains secure when sent, but we can agree a relevant and secure format with you.

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 excessive or repetitive. Alternatively, we may refuse to comply with the request in such circumstances.

9.3 The right to have personal data corrected or made complete. If you believe that the information we hold is incorrect or incomplete and needs to be updated, please contact an Accord staff member and they will help to make sure that the information is updated.

9.4 The right to have personal information erased. If you believe that some or all of your personal data should be deleted you can contact Accord's Data Protection Officer (dpo@accordgroup.org.uk) who will investigate your query. You have a right for personal data

to be erased as long as it is not deemed essential that it is retained for the delivery of service or contract or required for legal or regulatory requirements.

9.5 The right to **object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) 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 where we are processing your personal information for direct marketing purposes.

9.6 The right to **restrict processing** of your personal information. This enables you to ask us to suspend our processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

9.7 The right to **move, copy or transfer** your personal information to another party as long as this does not affect Accord's contractual or legal obligations working with you.

9.8 The right to **query automated decision making**, which may have a legal impact or significant effect.

We will need to request specific information from you to help us confirm your identity so that you can exercise any of these rights. This is security measure to ensure that personal information is only disclosed to the person who proves that they have a right to access it.

If you believe that Accord has not complied with your data protection rights, you can complain to the Information Commissioners Office via the following web-site (<https://ico.org.uk/concerns/handling>).

10 What if your personal data changes?

You should tell us when your personal data changes so that we can keep our records up-to-date and accurate. Please refer to the Contact Us section of our website and we'll update your records if we can.

11 Transferring personal data outside of the UK/European Economic Area

Accord is based in the UK and will not transfer your data outside the European Economic Area.

12 Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

13 Changes to this Privacy Notice

We may change this privacy notice from time to time in order to reflect changes in the law and/or in our privacy practices. You will be able to access the latest privacy notice via our web-site – <http://www.accordgroup.org.uk>