



## Privacy Notice

At Sovini Group we take the protection, privacy, confidentiality and security of your personal data very seriously. This Privacy Notice will inform you as to how we look after your personal data that we collect when you do business with us, utilise our services or work with us in using the provision of our services. You will also find information about your privacy rights and how the law protects you.

This notice sets out our commitment to protecting personal data and is designed to comply with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 with effect from 25<sup>th</sup> May 2018.

The Sovini Group consists of a number of different legal entities which includes Sovini Limited and a number of Group Members. Further information about our Group Members can be found here: <https://sovini.co.uk/our-group-members/>. For simplicity throughout this notice, 'we' and 'us' means the Sovini Group.

You can download a copy of the Privacy Notice here

This Privacy Notice is provided in a layered format so you can click through to the specific areas set out below.

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## Who we are and the purpose of this Privacy Notice

This Privacy Notice aims to give you information on how Sovini Group collects and processes your personal data.

We obtain your personal data in order to conduct our normal business operations as a property management and development company. How we use your personal identifiable information depends on the products and services we provide to you or how you work with us to provide our services.

The Sovini Group is a controller and responsible for your personal data (for simplicity throughout this notice “we”, “us” or “our” means the Sovini Group in this Privacy Notice).

The Sovini Group which is made up of different legal entities, details of which can be found on [The Sovini Group website](#).

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## Changes to the Privacy Notice and your duty to inform us of changes

We keep our Privacy Notice under regular review. This version was last updated in September 2023. Historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

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## How is your personal data collected?

We use different methods to collect data from and about you including through face-to-face contact, email, telephone, written correspondence, forms on our website or receiving this information from others.

We can also receive information about you from other people who know you or are linked to you, for example: referees when making applications for employment, or your legal representatives.

Some further examples of how we may gather your personal data are set out below:

**Directly from you:** for example when you fill out an application form for applying for employment.

**From other organisations:** such as reference and fraud prevention agencies, a local MP who represents you, the Police and Local authorities.

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## **Our processing of your personal information**

We collect varying information about you and use it for different reasons according to the relationship we have with you. For example, we will collect different personal information depending on whether you are an entity we work with when providing our services called a “business partner” below or a “member of the public” when visiting our offices.

In order to make this notice as user friendly as possible, we have split it into different sections. Please click on the section below that best describes your relationship with us.

[Business Partner](#)

[Member of the public](#)

[Employee](#)

[Applicants and candidates for employment](#)

[Board Members](#)

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## **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide a commercial service).

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## **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us using the detail set out below.

If we need to use your personal data 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 data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

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## Disclosures of your personal data

We may share your personal data with the following categories of recipients;

- The Police.
- Local authorities.
- Fraud Prevention Agencies.
- MP's acting on your behalf.
- Third party service providers who help us to deliver our services to you, this can range from utility companies, maintenance contractors, entities that help financial inclusion support to software and infrastructure providers which help you to access our services.
- Our professional advisors such as auditors and legal advisors.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions through non-disclosure and confidentiality agreements.

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## CCTV

Some of our locations and offices have closed circuit television (CCTV) and you may be recorded when you visit them. We use CCTV to provide security and protect both our visitors.

We will only view CCTV when it is necessary to do so, for example to detect or prevent crime. We store the footage for a set period of time after which it is recorded over. We ensure that we comply with the ICO's CCTV Code of Practice and we put up notices so you know when CCTV is used.

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## International transfers

Sovini may occasionally process your personal information overseas this will be for the storage of data in systems that are cloud based, cloud adoption is now around 90 % in the UK.

When processing data in this way Sovini have to ensure that cloud services are compliant and that systems and applications are adhering to current United Kingdom General Data Protection Regulation and Data Protection Act 2018.

We will not share your information with countries or organisations who are outside of the European Economic Area (EEA) unless to a country or an international organisation that has an appropriate “adequacy decision”; such countries include: Andorra, Argentina, Canada, the Faroe Islands, Guernsey, Israel, the Isle of Man, Japan, Jersey, New Zealand, Switzerland and Uruguay. Transfers are also allowed where “appropriate safeguards” have been put in place.

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## **Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

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## **Data retention**

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you. Details of retention periods for different aspects of your personal data are available on request.

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## **Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

**“Request access”** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**“Request correction”** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**“Request erasure”** of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**“Object to processing”** of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**“Request restriction of processing”** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data’s accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**“Request the transfer”** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**“Withdraw consent at any time”** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact our Data Protection Officer – Stephen Reilly.

Email address: [dpenquiries@ovh.org.uk](mailto:dpenquiries@ovh.org.uk)

Postal address: The Sovini Group, PO Box 891. Orpington, BR6 1LY.

If you have a complaint about our use of your information, we would prefer you to contact us directly in the first instance so that we can address your complaint. However, you can also contact the Information Commissioner’s Office via their website at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) or write to them at:

Information Commissioner’s Office  
Wycliffe House  
Water Lane  
Wilmslow, Cheshire  
SK9 5AF

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### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

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## Automated decision making

We do not make automated decisions about you.

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## Contact details

We have appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this Privacy Notice. If you have any questions about this Privacy Notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below;

Full name of DPO: Stephen Reilly

Email address: [dpenquiries@ovh.org.uk](mailto:dpenquiries@ovh.org.uk)

Postal address: The Sovini Group, PO Box 891. Orpington, BR6 1LY.

**Sovini Ltd** – 0333 733 1200

**One Vision Housing** – 0300 365 1111

**Pine Court Housing** – 0151 709 6878

**Sovini Trade Supplies** – 0333 577 8080

**Sovini Property Services** – 0333 733 7600

**Sovini Waste Solutions** – 0151 523 2277

**Sovini Construction** – 0151 523 2277

**Amianto** – 0151 529 7111

**Teal Scaffold** – 0151 530 5454

**Sovini Land Acquisitions** – 0151 530 5454

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