



SUPPORTED LIVING

PRIVACY NOTICE FOR CONTRACTORS & SUPPLIERS

Applies to Aspirations Care Ltd. and Aspirations (SL) Ltd.

1. Introduction

Aspirations Care Ltd. and Aspirations (SL) Ltd. (herein after referred to as “Aspirations”, “we”, “us”, “our”) are committed to protecting your personal data and respecting your privacy.

This Privacy Notice explains how we collect, use, store, share, and protect personal data relating to **contractors, consultants, suppliers, sole traders, and representatives of supplier organisations** (“you”) who provide goods or services to us.

This notice applies:

- During procurement, tendering, or onboarding
- While a contractual or commercial relationship exists
- After the relationship ends, for a limited period in line with legal, contractual, and regulatory requirements

We review this Privacy Notice regularly to ensure it remains accurate and up to date.

2. What Is Personal Data?

Under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, **personal data** means any information relating to an identified or identifiable individual.

This includes information that identifies you directly (such as your name or contact details) or indirectly (such as correspondence, financial information, or records of services linked to you).

3. Who Is Responsible for Your Personal Data?

Aspirations Care Limited is the **data controller** for the personal data processed in connection with contractors and suppliers.

We process personal data in accordance with:

- The UK GDPR
 - The Data Protection Act 2018
 - Guidance issued by the Information Commissioner's Office (ICO)
 - Relevant contractual, financial, and regulatory obligations
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4. Our Legal Basis for Processing Your Personal Data

We only process your personal data where the law allows us to do so.

Article 6 UK GDPR - General Personal Data

We rely on one or more of the following lawful bases:

- **Article 6(1)(b) - Contract**
Where processing is necessary to enter into or perform a contract for goods or services.
- **Article 6(1)(c) - Legal Obligation**
Where processing is required to comply with legal duties, including tax, accounting, health and safety, safeguarding, and regulatory obligations.
- **Article 6(1)(f) - Legitimate Interests**
Where processing is necessary for our legitimate business interests, including procurement, contract management, business continuity, risk management, quality assurance, and defending legal claims, provided those interests are not overridden by your rights and freedoms.

We do not rely on consent as the lawful basis for processing personal data in supplier or contractor relationships.

5. Special Category Data

In limited circumstances, we may process **special category data** relating to contractors or supplier representatives, for example:

- Health information relating to fitness to work or reasonable adjustments
- Equality and diversity monitoring information

Where this occurs, we process such data lawfully under one or more of the following conditions:

- **Article G(2)(b)** - Employment and social protection law
- **Article G(2)(g)** - Substantial public interest

These conditions are supported by **Schedule 1 of the Data Protection Act 2018**, and appropriate safeguards are in place.

6. How We Obtain Your Personal Data

We may obtain personal data about you from:

- You directly (during procurement, onboarding, or service delivery)
 - Your employer or organisation (where you are a representative)
 - References or due diligence checks
 - Publicly available sources (such as professional registers or company websites)
 - Records created during contract management or performance monitoring
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7. What Personal Data We Hold About You

The personal data we may hold includes:

- Name, address, and contact details
- Business or employer details
- Job role or professional capacity
- Contractual agreements and related correspondence
- Payment and banking details (where applicable)

- Invoices and financial records
 - Compliance documentation (e.g. insurance, qualifications, training)
 - Health and safety records relevant to services provided
 - Performance, quality, or incident records (where applicable)
 - Complaint or dispute records (if relevant)
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8. How We Use Your Personal Data

We use your personal data for purposes including:

- Procuring goods and services
 - Managing contractual relationships
 - Processing payments and managing accounts
 - Communicating about services, performance, or requirements
 - Managing health and safety and safeguarding obligations
 - Monitoring quality, compliance, and performance
 - Managing risk and business continuity
 - Meeting legal, financial, and regulatory requirements
 - Exercising or defending legal rights
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G. Who We Share Your Personal Data With

We may share your personal data, where lawful and necessary, with:

- Internal teams responsible for procurement, finance, governance, and operations
- Legal advisors, auditors, and accountants
- Insurers and financial institutions
- Regulators or statutory bodies where required by law
- Courts or law enforcement agencies where legally required

We only share personal data that is relevant and proportionate to the purpose for which it is shared.

10. International Transfers

We do not routinely transfer your personal data outside the United Kingdom.

Where personal data is processed using systems or service providers based outside the UK, appropriate safeguards will be in place in accordance with UK GDPR requirements.

11. Accuracy of Your Personal Data

It is important that the personal data we hold about you is accurate and up to date.

Please inform us promptly if your details change.

12. How Long We Keep Your Personal Data

We retain personal data in line with our **Records Retention Policy**.

In most cases:

- Contractual and financial records are retained for **six years** after the end of the contractual relationship
- Some records may be retained for longer where required by law or in connection with legal claims or audits

We only retain personal data for as long as it is necessary and lawful to do so.

13. Your Rights Under Data Protection Law

You have the right to:

- Be informed about how your personal data is used
- Access your personal data
- Request correction of inaccurate or incomplete data
- Request erasure of personal data in certain circumstances
- Request restriction of processing
- Object to processing based on legitimate interests
- Request data portability where applicable
- Not be subject to solely automated decision-making

Some rights may be limited where data must be retained for legal or contractual reasons.

14. How to Exercise Your Rights

If you have questions about this Privacy Notice or wish to exercise your data protection rights, please contact:

CEO

Christine Cameron

Aspirations Care Ltd
Corinium House Barnwood Business Park
Corinium Avenue
Gloucester GL4 3HX

Aspirations (SL) Ltd
Kings Buildings
Hill St
Lydney
GL15 5HE

Email: DPO@aspirationscare.com

15. Complaints and the Information Commissioner's Office (ICO)

If you are dissatisfied with how we handle your personal data, you have the right to complain to the Information Commissioner's Office (ICO):

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Telephone: 0303 123 1113
Website: <https://ico.org.uk>

ICO Registration Number Aspirations Care Ltd: **Z8717214**

ICO Registration Number Aspirations (SL) Ltd: **ZB736413**