Data Protection Policy and Privacy Notice

Document Owner: APD Maintenance Ltd
Applies To: APD Maintenance Ltd management, employees and subcontractors where relevant
Review Frequency: At least annually, and following significant changes to legislation, regulations, standards or client requirements

1. Purpose and Scope

APD Maintenance Ltd is committed to protecting the privacy and security of personal information entrusted to the company. This Data Protection Policy and Privacy Notice explains how APD Maintenance Ltd collects, uses, stores, protects and shares personal information in the course of its business activities.

This document applies to personal information relating to customers, tenants, landlords, property managers, estate agents, suppliers, subcontractors, job applicants, employees and other individuals who interact with APD Maintenance Ltd.

APD Maintenance Ltd recognises that personal information must be handled responsibly, securely and transparently. The company will process personal information in accordance with applicable UK data protection legislation and will take reasonable steps to prevent unauthorised access, loss, misuse, alteration or disclosure.

2. Information We Collect

APD Maintenance Ltd may collect personal information that is necessary to provide and manage its property maintenance services and operate the business.

This may include names, addresses, telephone numbers, email addresses, property addresses, access information, job details, correspondence, photographs relating to maintenance works, payment and invoicing information, contractor information and information necessary to communicate with customers, tenants, landlords, estate agents and other parties involved in a maintenance job.

Where APD Maintenance Ltd recruits or engages individuals, the company may also collect information relating to employment or subcontracting arrangements, qualifications, experience,

insurance, contact details and other information necessary to establish and manage the working relationship.

APD Maintenance Ltd will only collect information that is relevant to the purpose for which it is required and will avoid collecting unnecessary personal information.

3. How We Obtain Personal Information

APD Maintenance Ltd may obtain personal information directly from the individual concerned, for example when a customer contacts the company, a contractor applies for work or a tenant provides contact or access information.

APD Maintenance Ltd may also receive personal information from third parties. This is particularly relevant to the company's property maintenance activities, where information may be provided by estate agents, landlords, property managers, managing agents or other customers in order for APD Maintenance Ltd to arrange and complete maintenance work.

Where personal information is obtained from another source, APD Maintenance Ltd will handle that information in accordance with applicable data protection requirements and provide appropriate privacy information where required. The ICO confirms that different information requirements can apply where personal data is obtained from a source other than the individual.

Where APD receives tenant or occupant information from a letting agent, landlord or managing agent, APD will coordinate with the instructing organisation to ensure appropriate privacy information is provided. Where APD is responsible for providing that information, it will do so within the applicable timeframe, including through a suitable notice in relevant communications.

4. Why We Use Personal Information

APD Maintenance Ltd uses personal information primarily to provide, manage and administer its property maintenance services.

This includes arranging appointments, communicating with customers and occupants, providing engineers with the information necessary to complete jobs, recording work undertaken, preparing quotations and invoices, managing accounts, responding to enquiries and complaints, administering subcontractors and suppliers, and maintaining appropriate business records.

Personal information may also be used where necessary to comply with legal or regulatory obligations, protect the company's legitimate business interests, prevent fraud or misuse, establish or defend legal claims, and maintain the security of company systems and information.

APD Maintenance Ltd will not use personal information for a new or incompatible purpose without considering the applicable data protection requirements and, where necessary, providing appropriate information to the individuals concerned.

We may contact tenants and occupants by phone, email, SMS or WhatsApp to arrange, confirm or reconfirm access for a maintenance visit. These messages are sent by our staff, or by our

scheduling system on their behalf, containing only what is needed (the visit date and time window, part of the address and a link to confirm), and replies are recorded against the job.

5. Lawful Basis for Processing

APD Maintenance Ltd will process personal information only where there is a lawful basis for doing so.

Depending on the circumstances, this may include processing that is necessary to perform a contract or take steps at an individual's request before entering into a contract, processing that

is necessary to comply with a legal obligation, processing that is necessary for APD Maintenance Ltd's legitimate interests, or processing where an individual has provided consent.

Where APD Maintenance Ltd relies on legitimate interests, the company will consider whether the processing is necessary for the legitimate interest being pursued and whether those interests are appropriately balanced against the individual's rights and interests.

Where consent is used as the lawful basis for processing, APD Maintenance Ltd will ensure that consent is appropriately obtained and that individuals are able to withdraw their consent where applicable.

The lawful basis used will depend on the particular processing activity and will be reviewed where the purpose or nature of the processing changes.

For maintenance appointments, access arrangements and job communications, the lawful basis may be legitimate interests or performance of a contract, depending on APD's role and the particular relationship. For accounting and statutory records, compliance with a legal obligation may apply. Where APD acts on behalf of an estate agent or managing agent as a processor, APD follows that organisation's documented instructions. APD will maintain an internal record mapping each processing activity to its applicable lawful basis or controller instructions.

Messages to arrange or confirm access are sent on the basis of our legitimate interests in carrying out the maintenance instructed, or, where we act for an instructing agent, on that agent's instructions.

6. Sharing Personal Information

APD Maintenance Ltd may share personal information where this is necessary to provide its services, operate the business or comply with legal obligations.

This may include sharing appropriate information with estate agents, landlords, property managers, managing agents, customers, subcontractors, engineers, suppliers, professional advisers, insurers, payment providers, IT and software service providers and other organisations providing services to APD Maintenance Ltd.

For example, where a maintenance job is instructed by an estate agent or property manager, APD Maintenance Ltd may need to provide relevant information to the engineer carrying out the

work and communicate information about the job to the instructing organisation or property occupant.

APD Maintenance Ltd will only share information that is reasonably necessary for the relevant purpose and will take reasonable steps to ensure that information is handled appropriately by those receiving it.

Messaging and email providers that deliver these messages on our behalf (for example WhatsApp, an SMS provider and an email delivery service) receive the details needed to send them.

We are currently transitioning our job scheduling operations to a secure, modern software platform. During this parallel deployment phase, strictly authorised technical developers may maintain the platform and its database. Their access to personal information is limited to what is necessary, restricted to named individuals, and contractually secured to maintain strict confidentiality. Information is encrypted in transit and at rest. The platform and its database are hosted in the United Kingdom.

7. Information Security

APD Maintenance Ltd takes reasonable technical and organisational measures to protect personal information against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or unauthorised access.

Access to personal information will be limited to people who require it for legitimate business purposes. Employees, subcontractors and other individuals who have access to personal information are expected to handle it responsibly and maintain confidentiality.

APD Maintenance Ltd will use appropriate passwords, access controls, software security measures and other reasonable safeguards appropriate to the nature and sensitivity of the information being processed.

Where a personal data breach occurs, APD Maintenance Ltd will assess the incident and take appropriate action in accordance with applicable data protection requirements.

8. Data Retention

APD Maintenance Ltd will not retain personal information indefinitely. Personal information will be retained only for as long as it is reasonably necessary for the purpose for which it was collected, to comply with legal or regulatory obligations, to establish or defend legal claims, or for legitimate business purposes.

The appropriate retention period will depend on the type of information and the reason it is being retained. Financial and business records may need to be retained for longer periods where required by law, taxation requirements, contractual obligations or other legitimate business needs.

Retention criteria include the duration of the maintenance relationship, contractual requirements of instructing clients, applicable tax and accounting record-keeping obligations, limitation periods for potential claims, and the need to resolve complaints or defects. APD will document the specific periods applicable to its categories of records in an internal retention schedule and apply deletion or anonymisation when those periods expire.

When personal information is no longer required, APD Maintenance Ltd will take reasonable steps to securely delete, destroy or otherwise dispose of it.

The ICO recommends that organisations state either their specific retention periods or the criteria used to determine how long information is retained.

9. Individual Rights

Individuals have rights in relation to their personal information, subject to the circumstances and exemptions provided by applicable data protection legislation.

These rights may include requesting access to personal information held by APD Maintenance Ltd, requesting that inaccurate information is corrected, requesting deletion of information in certain circumstances, requesting restriction of processing, objecting to certain processing and requesting transfer of information in circumstances where the right to data portability applies.

Where processing is based on consent, an individual may withdraw their consent at any time. Withdrawal of consent will not affect the lawfulness of processing carried out before consent was withdrawn.

APD Maintenance Ltd will respond to valid requests within the applicable statutory timescales and may need to verify the identity of the person making a request before providing information.

10. Complaints and Concerns

Anyone who has concerns about the way APD Maintenance Ltd handles their personal information should contact the company using the contact details provided below. APD Maintenance Ltd will consider and investigate complaints relating to the handling of personal information and will take appropriate action where necessary.

Individuals also have the right to complain to the Information Commissioner's Office (ICO) if they believe that their personal information has not been handled appropriately.

Further information about making a complaint can be obtained from the Information Commissioner's Office.

11. Data Protection Requests

Requests relating to an individual's personal information should be made to APD Maintenance Ltd using the contact details provided below.

When making a request, individuals should provide sufficient information to allow APD Maintenance Ltd to identify the information concerned and deal with the request appropriately. APD Maintenance Ltd may request additional information where this is reasonably necessary to verify identity or clarify the request.

APD Maintenance Ltd will deal with requests in accordance with the applicable legal requirements.

12. Personal Information Obtained Through Customers and Third Parties

APD Maintenance Ltd frequently receives personal information from customers, estate agents, landlords and property managers in order to carry out maintenance services.

Where this occurs, APD Maintenance Ltd may process information relating to tenants, occupants, landlords, property owners, contractors or other individuals whose details have been supplied as part of a maintenance instruction.

APD Maintenance Ltd will use such information only for legitimate business purposes connected with the maintenance service, including arranging access, communicating about the job, carrying out the requested works, recording the work undertaken and communicating relevant information to the organisation or individual who instructed the work.

Where information is obtained from another organisation, APD Maintenance Ltd will take reasonable steps to ensure that the information is handled lawfully and securely.

13. Photographs and Property Information

APD Maintenance Ltd may take photographs of properties, maintenance issues, completed works or materials where this is necessary to document work, prepare quotations, provide evidence of completed works, investigate defects, communicate with customers or maintain appropriate job records.

Photographs will be limited to what is reasonably necessary for the relevant business purpose. Where photographs may contain identifiable individuals or other personal information, APD Maintenance Ltd will take reasonable steps to handle that information in accordance with applicable data protection requirements.

14. Subcontractors and Engineers

APD Maintenance Ltd uses self-employed subcontractors and engineers to carry out maintenance work.

Relevant personal information may be provided to subcontractors where necessary to allow them to carry out an allocated job. This may include the property address, access arrangements, contact details and information concerning the maintenance issue.

Subcontractors are expected to keep information confidential, use it only for legitimate work purposes and take reasonable precautions to prevent unauthorised disclosure or misuse.

15. International Transfers and Third-Party Systems

APD Maintenance Ltd may use third-party software, cloud-based systems and service providers to operate its business and manage information.

Where personal information is processed outside the United Kingdom or is transferred internationally, APD Maintenance Ltd will consider the applicable legal requirements and ensure that appropriate safeguards are in place where required.

APD Maintenance Ltd will not knowingly transfer personal information internationally without considering the applicable data protection requirements.

We are currently transitioning our job scheduling operations to a secure, modern software platform. During this parallel deployment phase, strictly authorised technical developers may maintain the database architecture. However, technical access to live tenant contact details is restricted to named individuals, logged, and contractually secured to maintain strict confidentiality.

16. Automated Decision-Making

APD Maintenance Ltd does not currently make decisions about individuals based solely on automated processing or profiling where those decisions produce legal or similarly significant effects on the individual.

Where the company's use of technology changes in a way that involves automated decision-making or profiling of this nature, APD Maintenance Ltd will review the applicable data protection requirements and update its privacy information where necessary.

17. Data Protection Responsibilities

Responsibility for data protection within APD Maintenance Ltd rests with the company's management. Management is responsible for ensuring that appropriate arrangements are in place for the lawful, secure and responsible handling of personal information.

All individuals working for or on behalf of APD Maintenance Ltd who have access to personal information are responsible for handling that information appropriately and reporting any suspected loss, unauthorised disclosure or security incident promptly.

18. Review of This Policy and Privacy Notice

APD Maintenance Ltd will review this Data Protection Policy and Privacy Notice periodically and whenever there is a significant change to the way the company collects, uses, stores or shares personal information.

The document will also be updated where necessary to reflect changes in legislation, regulatory guidance, company systems or business practices.

The ICO recommends that privacy information is kept under regular review and updated before introducing new uses of personal information where appropriate.

19. Contact Details

For questions, concerns or requests relating to personal information, individuals should contact APD Maintenance Ltd.

APD Maintenance Ltd
Location: London, United Kingdom
Email: job@apdmaintenance.co.uk
Telephone: 020 3026 6554

Salisbury House
29 Finsbury Circus
London, EC2M 5SQ
Tel: 020 3026 6554
apdmaintenance.co.uk

© 2026 APD Maintenance Ltd. All rights reserved.

This document is the property of APD Maintenance Ltd and is intended for internal use only. No part of this document may be reproduced, distributed, or disclosed to any third party without prior written permission from APD Maintenance Ltd.

Please contact adam@apdmaintenance.co.uk or hr@apdmaintenance.co.uk with any questions.