# ST ALBANS BID GENERAL PRIVACY NOTICE

## Introduction

This privacy notice provides you with details of how we collect and process your personal data through your use of our sites stalbansbid.com and enjoystalbans.com, including any information you may provide through our sites when you purchase a product or service, sign up to our newsletter or take part in a prize draw or competition.

This Privacy Notice is provided to you by St Albans BID which is the data controller for your data. St Albans BID is registered with the Information Commissioners Office, reference number: ZA326354

By providing us with your data, you warrant to us that you are over 13 years of age. Vivien Cannon of St Albans BID is the data controller and is responsible for your personal data (referred to as "we", "us" or "our" in this privacy notice). If you have any questions about this privacy notice, please contact the BID Manager using the details set out below.

Vivien Cannon
vivien.cannon@stalbansbid.gov.uk

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at info@stalbansbid.com

## Your personal data – what is it?

"Personal data" is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address, or address). Identification can be directly using the data itself or by combining it with other information which helps to identify a living individual (e.g. a list of staff may contain personnel ID numbers rather than names but if you use a separate list of the ID numbers which give the corresponding names to identify the staff in the first list then the first list will also be treated as personal data). The processing of personal data is governed by legislation relating to personal data which applies in the United Kingdom including the General Data Protection Regulation (the "GDPR) and other legislation relating to personal data and rights such as the Human Rights Act.

## How we use your personal data

We will only use your personal data when legally permitted. The most common uses of your personal data are:

- Where we need to perform the contract between us.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal ground for processing your personal data, other than in relation to sending marketing communications to you via email, text message or other methods. You have the right to withdraw consent to marketing at any time by emailing us at info@stalbansbid.com

## The BID will process some or all of the following personal data where necessary to perform its tasks:

- Names, titles, and aliases, photographs;
- Contact details such as telephone numbers, addresses, and email addresses;
- Where they are relevant to the services provided by a BID, or where you provide them to us, we may process information such as gender, age, marital status, nationality, education/work history, academic/professional qualifications, hobbies, family composition, and dependants;
- Where you pay for activities such as use of a BID equipment, financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers;
- The personal data we process may include sensitive or other special categories of personal data such as criminal convictions, racial or ethnic origin, mental and physical health, details of injuries, medication/treatment received, political beliefs, trade union affiliation, genetic data, biometric data, data concerning and sexual life or orientation.

We may also process Aggregated Data from your personal data but this data does not reveal your identity and as such in itself is not personal data. An example of this is where we review your Usage Data to work out the percentage of website users using a specific feature of our site. If we link the Aggregated Data with your personal data so that you can be identified from it, then it is treated as personal data.

## We collect data about you through a variety of different methods including:

**Direct interactions:** You may provide data by filling in forms on our site (or otherwise) or by communicating with us by post, phone, email or otherwise, including when you:

- order our products or services;
- create an account on our site;
- subscribe to our service or publications;
- request resources or marketing be sent to you;
- enter a competition, prize draw, promotion or survey; or give us feedback.

**Automated technologies or interactions:** As you use our site, we may automatically collect Technical Data about your equipment, browsing actions and usage patterns. We collect this data by using cookies, server logs and similar technologies. We may also receive Technical Data about you if you visit other websites that use our cookies. Please see our cookie policy for further details.

**Third parties or publicly available sources:** We may receive personal data about you from various third parties and public sources as set out below:
analytics providers such as Google based outside the EU;

- advertising networks based inside OR outside the EU; and
- search information providers inside OR outside the EU
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside OR outside the EU
- Identity and Contact Data from data brokers or aggregators based inside OR outside the EU
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU

## How we use sensitive personal data

- We may process sensitive personal data including, as appropriate:
  - your racial or ethnic origin or religious or similar information in order to monitor compliance with equal opportunities legislation;
  - in order to comply with legal requirements and obligations to third parties.
- These types of data are described in the GDPR as “Special categories of data” and require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal data.
- We may process special categories of personal data in the following circumstances:
  - In limited circumstances, with your explicit written consent.
  - Where we need to carry out our legal obligations.
  - Where it is needed in the public interest.
- Less commonly, we may process this type of personal data where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else’s interests) and you are not capable of giving your consent, or where you have already made the information public.

## Do we need your consent to process your sensitive personal data?

- In limited circumstances, we may approach you for your written consent to allow us to process certain sensitive personal data. If we do so, we will provide you with full details of the personal data that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

## The BID will comply with data protection law. This says that the personal data we hold about you must be:

- Used lawfully, fairly and in a transparent way.

- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept and destroyed securely including ensuring that appropriate technical and security measures are in place to protect your personal data to protect personal data from loss, misuse, unauthorised access and disclosure.

## We use your personal data for some or all of the following purposes:

- To deliver services including to understand your needs to provide the services that you request and to understand what we can do for you and inform you of other relevant services;
- To confirm your identity to provide some services;
- To contact you by post, email, telephone or using social media (e.g., Facebook, Twitter);
- To help us to build up a picture of how we are performing;
- To prevent and detect fraud and corruption in the use of funds and where necessary for the law enforcement functions;
- To enable us to meet all legal and statutory obligations and powers including any delegated functions;
- To carry out comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practice from time to time with the aim of ensuring that all children and adults-at-risk are provided with safe environments and generally as necessary to protect individuals from harm or injury;
- To promote the interests of the BID;
- To maintain our own accounts and records;
- To seek your views, opinions or comments;
- To notify you of changes to our facilities, services, events and staff, Board Directors and other role holders;
- To send you communications which you have requested and that may be of interest to you. These may include information about campaigns, appeals, other new projects or initiatives;
- To process relevant financial transactions including grants and payments for goods and services supplied to the BID
- To allow the statistical analysis of data so we can plan the provision of services.

## What is the legal basis for processing your personal data?

The BID is a not-for-profit company limited by grantee and has certain obligations to deliver activities in support of its levy payers. We will always take into account your interests and rights. This Privacy Notice sets out your rights and the BID's obligations to you.

We may process personal data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract. An example of this would be

processing your data in connection with the use of equipment, or the acceptance to receive regular newsletters.
Sometimes the use of your personal data requires your consent. We will first obtain your consent to that use.

## Sharing your personal data

This section provides information about the third parties with whom the BID may share your personal data. These third parties have an obligation to put in place appropriate security measures and will be responsible to you directly for the manner in which they process and protect your personal data. It is likely that we will need to share your data with some or all of the following (but only where necessary):

- The data controllers listed below under the heading "Other data controllers the BID works with";
- Our agents, suppliers and contractors. For example, we may ask a commercial provider to publish or distribute newsletters on our behalf, or to maintain our database software;
- On occasion, other BIDs or not for profit bodies with which we are carrying out joint ventures e.g. in relation to facilities or events for the community.

## Other data controllers the BID works with, e.g. such as:

- local authorities,
- Community groups**,**
- Charities,
- Other not for profit entities,
- Contractors**,**
- Credit reference agencies.

We may need to share your personal data we hold with them so that they can carry out their responsibilities to the BID. If we and the other data controllers listed above are processing your data jointly for the same purposes, then the BID and the other data controllers may be "joint data controllers" which mean we are all collectively responsible to you for your data. Where each of the parties listed above are processing your data for their own independent purposes then each of us will be independently responsible to you and if you have any questions, wish to exercise any of your rights (see below) or wish to raise a complaint, you should do so directly to the relevant data controller.

## How long do we keep your personal data?

We will keep some records permanently if we are legally required to do so. We may keep some other records for an extended period of time. For example, it is currently best practice to keep financial records for a minimum period of 7 years to support HMRC audits or provide tax information. The BID is permitted to retain data in order to defend or pursue claims. In some cases the law imposes a time limit for such claims (for example 3 years for personal injury claims or 6 years for contract claims). We will retain some personal data for this purpose as long as we believe it is necessary to be able to defend or pursue a claim. In general, we will endeavour to

keep data only for as long as we need it. This means that we will delete it when it is no longer needed.

## Your rights and your personal data

You have the following rights with respect to your personal data:
When exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

a. ***The right to access personal data we hold on you***
At any point you can contact us to request the personal data we hold on you as well as why we have that personal data, who has access to the personal data and where we obtained the personal data from. Once we have received your request we will respond within one month.

b. There are no fees or charges for the first request but additional requests for the same personal data or requests which are manifestly unfounded or excessive may be subject to an administrative fee.

c. ***The right to correct and update the personal data we hold on you***
If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.

d. ***The right to have your personal data erased***
If you feel that we should no longer be using your personal data or that we are unlawfully using your personal data, you can request that we erase the personal data we hold.
When we receive your request we will confirm whether the personal data has been deleted or the reason why it cannot be deleted (for example because we need it for to comply with a legal obligation).

e. ***The right to object to processing of your personal data or to restrict it to certain purposes only***
You have the right to request that we stop processing your personal data or ask us to restrict processing. Upon receiving the request we will contact you and let you know if we are able to comply or if we have a legal obligation to continue to process your data.

f. ***The right to data portability***
You have the right to request that we transfer some of your data to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.

g. ***The right to withdraw your consent to the processing at any time for any processing of data to which consent was obtained***
You can withdraw your consent easily by telephone, email, or by post (see Contact Details below).

h. ***The right to lodge a complaint with the Information Commissioner's Office.***
You can contact the Information Commissioners Office on 0303 123 1113 or via email https://ico.org.uk/global/contact-us/email/ or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

## Transfer of Data Abroad

Any personal data transferred to countries or territories outside the European Economic Area ("EEA") will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union. Our website is also accessible from overseas so on occasion some personal data (for example in a newsletter) may be accessed from overseas.

## Further processing

If we wish to use your personal data for a new purpose, not covered by this Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

## Changes to this notice

We keep this Privacy Notice under regular review and we will place any updates on the BID website: www.stalbansbid.com This Notice was last updated in May 2023.

## Contact Details

Please contact us if you have any questions about this Privacy Notice or the personal data we hold about you or to exercise all relevant rights, queries or complaints at:

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Tel: 01727 251310 Email: info@stalbansbid.com