

Northfield Town Centre BID Ltd

Privacy Policy Notice

The policy: This privacy policy notice is for this website; www.northfieldbid.com and served by Northfield Town Centre BID Ltd, c/o 693 Bristol Road South, Northfield, Birmingham, B31 2JT and governs the privacy of those who use it. The purpose of this policy is to explain to you how we control, process, handle and protect your personal information while browsing or using this website, including your rights under current laws and regulations. If you do not agree to the following policy, you may wish to cease viewing / using this website.

Policy key definitions:

- "I", "our", "us", or "we" refer to the business, [Northfield Town Centre BID Ltd & Northfield BID].
- "you", "the user" refer to the person(s) using this website.
- GDPR means General Data Protection Act.
- PECR means Privacy & Electronic Communications Regulation.
- ICO means Information Commissioner's Office.
- Cookies mean small files stored on a user's computer or device.

Processing of your personal data

Under the GDPR (General Data Protection Regulation) we control and / or process any personal information about you electronically using the following lawful bases.

We are registered with the ICO under the Data Protection Register, our registration number is: ZA180130.

1. **Lawful basis:** Legitimate interests.

Northfield BID has a legal obligation to hold liable party information to ensure that the original Ballot and any subsequent Renewal is legitimate. Data is supplied to Northfield BID by Birmingham City Council through the operating agreement. The data is taken from the City Council's non-domestic rates database to identify eligible hereditaments in the BID area and for billing of the rate payers for each eligible hereditament. This data is enhanced with personally-identifiable information collected by the BID Management Team to communicate with BID Levy Payers and their representative employees on a day to day basis.

The reason we use this basis: We need to know your basic personal data to fulfil several legal obligations:

- To communicate to you how the levy is being invested.
- To demonstrate to you the benefits of the investments being made.
- To ensure you are receiving the services for which you are eligible.
- To consult with you regarding a renewal ballot process to secure a further five-year term.

We will only use your personal information for the purposes of contacting you about Northfield BID's activities and local issues relating to the Town Centre which may have an

impact on your employer's business. In this respect we process your personal data based on legitimate interest rather than consent.

Northfield BID is the 'Data Controller' of personal data that identifies business owners and/or employees of those businesses that by law must pay the BID levy on business rates.

We process your information in the following ways: The BID will process this data based on legitimate interest rather than consent. The BID will collect basic personal data about you which includes your name, job title, business or personal email address and your contact telephone number. We identify in the data we process whether you are a local contact, billing contact or a voter contact.

This personally-identifiable information is collected by members of the BID Management Team to communicate with BID Levy Payers and their representative employees on a day to day basis. (The definition of BID Management team extends to the BID Town Centre Manager, BID Operations Support Officer and the BID High Street Security Officer who will collect personal information on the BID's behalf.)

Data retention period: Your information which we use for engagement purposes will be kept for

- a. as long as Northfield BID is operational. The term of the BID ends on 31 December 2021 pending a renewal ballot for a further five years or
- b. for as long as your organisation is eligible to pay the BID levy.

Sharing your information: We do not share your information with third parties.

2. Lawful basis: Consent

The reason we use this basis: Northfield BID may undertake use email marketing, social media, phone, SMS via the website or otherwise to provide updates to Town Centre services, participate in market research initiatives (complete a questionnaire, competition entry), complete job application forms, promote events, and encourage participation in the Town Centre events. This will be aimed at BID consumers – customers and visitors to the Town Centre.

We process your information in the following ways: Northfield BID will rely solely upon your consent where you have provided your personal data through the Northfield BID website or to a third party who the BID has employed to collect and process the data obtained. You must have given your consent freely and you can withdraw your consent at any time.

Data retention period: The information gathered and processed will be used for engagement purposes. We will continue to process your information under this basis until you withdraw consent, or it is determined your consent no longer exists.

Sharing your information: We do not share your information with third parties.

3. Lawful basis: Contract

The reason we use this basis: Northfield BID uses contractors and the supplier of products and services to fulfil its priorities as determined within its BID2 business plan.

We process your information in the following ways: The BID will hold details of the proposed work to be carried out which will include contractors' business name, contact name, location address, email address, landline/mobile phone number, public liability insurance provider, bank account details and evidence of contracted work carried out.

Data retention period: We shall continue to process your information until the contract between us ends or is terminated under any contract terms.

Sharing your information: We do share your personal information with third parties and they include other UK business improvement districts, town centre partners and other statutory agencies such as Birmingham City Council (their contractors and sub-contractors) and West Midlands Police.

If, as determined by us, the lawful basis upon which we process your personal information changes, we will notify you about the change and any new lawful basis to be used if required.

We shall stop processing your personal information if the lawful basis used is no longer relevant.

Your individual rights

Under the GDPR your rights are as follows. You can read more about [your rights in details here](#);

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability;
- the right to object; and
- the right not to be subject to automated decision-making including profiling.

You also have the right to complain to the ICO [www.ico.org.uk] if you feel there is a problem with the way we are handling your data.

We handle subject access requests in accordance with the GDPR.

Internet cookies

We use cookies on this website to provide you with a better user experience. We do this by placing a small text file on your device / computer hard drive to track how you use the

website, to record or log whether you have seen messages that we display, to keep you logged into the website where applicable, to display relevant adverts or content, referred you to a third-party website.

Some cookies are required to enjoy and use the full functionality of this website.

We use a cookie control system which allows you to accept the use of cookies, and control which cookies are saved to your device / computer. Some cookies will be saved for specific time periods, where others may last indefinitely. Your web browser should provide you with the controls to manage and delete cookies from your device, please see your web browser options.

Depending upon your devices operating system, you can find further information about the management of cookies on the ICO website: <https://ico.org.uk/your-data-matters/online/cookies/>

Data security and protection

We ensure the security of any personal information we hold by using secure data storage technologies and precise procedures in how we store, access and manage that information. Our methods meet the GDPR compliance requirement.

Transparent Privacy Explanations

We have provided some further explanations about user privacy and the way we use this website to help promote a transparent and honest user privacy methodology.

Sponsored links, affiliate tracking & commissions

Our website may contain links to other social media platforms managed by Northfield BID. These are:

<https://www.facebook.com/northfield.bid.3>
www.facebook.com/NorthfieldBID
www.facebook.com/VisitNorthfield
www.facebook.com/NorthfieldTownCentreEvents
<https://twitter.com/@NorthfieldBID>
<https://twitter.com/@VisitNorthfield>
https://www.instagram.com/northfield_bid

Apart from the posts created from the Northfield BID social media platforms, Northfield BID do not control the actual adverts seen / displayed by Facebook, Twitter, Instagram's advertising partners. The social media platforms may collect data and use cookies for ad personalisation and measurement. Where ad preferences are requested as 'non-personalised' cookies may still be used for frequency capping, aggregated ad reporting and to combat fraud and abuse.

Clicking on any affiliate links may track your actions by using a cookie saved to your device. You can read more about cookies on this website above. If you have any concerns about this

we suggest you do not click on any adverts, sponsored or affiliate links found throughout the website.

What are your rights?

If at any point you believe the information we process on you is incorrect you can ask to see this and have it corrected. You have a right to request that Northfield BID erases any personal data held. If you wish to raise a complaint on how we have handled your personal data, you can contact our Data Protection Officer who will investigate the matter.

If you are not satisfied with our response or believe we are processing your personal data not in accordance with the legislation, you can complain to the Information Commissioner's Office (ICO) on 0303 123 1113. More information can be obtained from www.ico.org.uk/concerns

Our Data Protection Officer is Marcia Greenwood and you can contact her at bid@northfieldbid.com