

PRIVACY POLICY

PURPOSE OF THIS PRIVACY POLICY

This privacy policy aims to give you information on how Harrow BID Company collects and processes your personal data.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

DATA CONTROLLER

Harrow Town Centre BID Company Limited is the controller and responsible for your personal data (collectively referred to as "Harrow BID", "we", "us" or "our" in this privacy policy).

We have appointed a data protection officer who is responsible for overseeing questions in relation to this privacy policy. Their details can be found at the bottom of this Policy.

We keep our privacy policy under regular review. This version was last updated in June 2018.

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.

HOW YOUR DATA IS COLLECTED

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your identity, contact and financial data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our services;
 - create an account on our website;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us feedback or contact us.

- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
 - Technical Data from the following parties:
 - (a) analytics providers such as Google based outside the EU;
 - (b) advertising networks; and
 - (c) search information providers based inside or outside the EU.
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery.
 - Identity and Contact Data from data brokers or aggregators.
 - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

HOW WE USE YOUR DATA

Harrow BID (and trusted partners acting on our behalf) uses your personal data:

- to comply with our legal obligation to consult with you regarding the continuation of the Harrow Town Centre BID Co Ltd;
- to verify your identity;
- for crime and fraud prevention, detection and related purposes;
- with your agreement, to contact you electronically about promotional marketing and sponsorship opportunities, events, and news we think may interest you;
- for market research purposes - to better understand your needs;
- to enable us to manage customer service interactions with you; and
- where we have a legal right or duty to use or disclose your information (for example in relation to an investigation by a public authority or in a legal dispute).
- We do not send marketing or event communications via post

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.

SHARING DATA WITH THIRD PARTIES

In order to make certain services available to you, we may need to share your personal data with some of our service partners. These include the local authority, IT, delivery and marketing service providers.

We only allow service providers to handle your personal data when we have confirmed that they apply appropriate data protection and security controls.

Other third parties

Aside from our service providers, we will not disclose your personal data to any third party, except as set out below. We will never sell data to other organisations for marketing purposes.

We may share your data with:

- our carefully selected partners who provide Harrow BID branded products and services (for example our Marketing agency)
- governmental bodies, regulators, law enforcement agencies, courts/tribunals and insurers where we are required to do so: -
 - to comply with our legal obligations;
 - to exercise our legal rights (for example in court cases);
 - for the prevention, detection, investigation of crime or prosecution of offenders; and
 - for the protection of our employees and customers.

INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the European Economic Area (**EEA**).

How long do we keep your data?

We will not retain your data for longer than necessary for the purposes set out in this Policy. Different retention periods apply for different types of data, however the longest we will normally hold any personal data is 6 years in accordance with HMRC rules.

We may collect the following information about you:

- your name;
- your contact details: postal address, telephone numbers (including mobile numbers) and e-mail address;
- your communication and marketing preferences;
- your feedback and survey responses;
- your location;
- your correspondence and communications with us; and
- other publicly available personal data, including any which you have shared via a public platform (such as a Twitter feed or public Facebook page).
- We will collect parental/guardian consent to photograph children under the age of 16 to use for the purposes of press, social media, and promotional literature. The telephone number of the consenting adult will only be used should the entrant win a prize.

This list is not exhaustive and, in specific instances, we may need to collect additional data for the purposes set out in this Policy. Some of the above personal data is collected directly, for example when you enter a competition. We may also collect personal data from third parties who have your consent to pass your details to us, or from publicly available sources.

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 you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

HOW WE PROTECT YOUR DATA

Harrow BID is committed to keeping your personal data safe and secure. 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.

Our security measures include: -

- Password protection on digital files;
- Anti-virus software on all PCs;
- Password/finger print protection on mobile phones;
- Keypad with regularly amended code to access the office

You have the following rights:

- the right to ask for a copy of personal data that we hold about you (the right of access); We will supply this information to you once we have verified your identity and within 14 days from receipt of request.
- the right (in certain circumstances) to request that we delete personal data held on you; where we no longer have any legal reason to retain it (the right of erasure or to be forgotten);
- the right to ask us to update and correct any out-of-date or incorrect personal data that we hold about you (the right of rectification);
- the right to opt out of any marketing communications that we may send you and to object to us using / holding your personal data if we have no legitimate reasons to do so (the right to object);
- the right (in certain circumstances) to ask us to 'restrict processing of data'; which means that we would need to secure and retain the data for your benefit but not otherwise use it (the right to restrict processing); and
- the right (in certain circumstances) to ask us to supply you with some of the personal data we hold about you in a structured machine-readable format and/or to provide a copy of the data in such a format to another organisation (the right to data portability).

If you wish to exercise any of the above rights, please contact us using the contact details below.

LEGAL BASIS FOR HARROW BID PROCESSING PERSONAL DATA

Harrow BID collects and uses personal data because it is necessary for:

- the pursuit of our legitimate interests (as set out below);
- complying with our legal obligations.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

In general, we only rely on consent as a legal basis for processing personal data in relation to sending direct marketing communications to members via email.

Members **have the right to withdraw consent at any time**. Where consent is the only legal basis for processing, we will cease to process data after consent is withdrawn.

OUR LEGITIMATE INTERESTS

The normal legal basis for processing customer data, is that it is necessary for the legitimate interests of Harrow BID, including:-

- protecting customers, employees and other individuals and maintaining their safety, health and welfare;
- promoting, marketing and advertising our services;
- improving existing services and developing new services;
- complying with our legal and regulatory obligations;
- preventing, investigating and detecting crime, fraud or anti-social behaviour and prosecuting offenders, including working with law enforcement agencies;
- handling member contacts, queries, complaints or disputes;
- effectively handling any legal claims or regulatory enforcement actions taken against Harrow BID; and
- fulfilling our duties to our members, colleagues, and other stakeholders.

DATA PROTECTION OFFICER

We have appointed a Data Protection Officer to ensure we protect the personal data of our customers (and others) and comply with data protection legislation.

If you have any questions about how we use your personal data that are not answered here, or if you want to exercise your rights regarding your personal data, please contact us by

- phone: 020 8863 9933;
- e-mail: info@ha1bid.co.uk or
- write to: Data Protection Officer, Harrow Town Centre BID Co Ltd, c/o Management Suite, 2nd Floor, St George's Shopping Centre, St Anns Road, Harrow HA1 1HS

You have the right to lodge a complaint with the Information Commissioner's Office. Further information, including contact details, is available at www.ICO.org.uk.

We would however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.