



## **Harrow Town Centre Business Against Crime Exclusion Scheme**

### **PRIVACY NOTICE (MEMBERS)**

This document explains who the Harrow Business Against Crime Exclusion Scheme (the Scheme) is, why it processes its Members' personal data, and the lawful basis for that processing. It describes the kind of personal data about Members that the Scheme is allowed to process, and what the Scheme can do with it.

#### **Contact details**

Harrow Business Against Crime  
C/o St George's Management Offices  
St Anns Road  
Harrow  
HA1 1HS  
Email address: [info@ha1bid.co.uk](mailto:info@ha1bid.co.uk)  
Tel: 020 8863 9933

The Scheme's Data Controller is responsible for ensuring its compliance with current Data Protection law and can be contacted at the above address, email address or telephone number. The Scheme is registered with the Information Commissioners Office as a Business Crime Reduction Partnership.

#### **Purpose of processing personal data**

The Scheme processes Members' personal data for the following purposes:

- to enable the efficient management of the Scheme; to manage the membership of the Scheme including subscriptions where relevant; invitations to the Scheme's Annual General Meeting and other meetings where relevant etc;
- to defend and indemnify the Scheme in case of any Member's non-compliance with the Scheme's *Rules & Protocols*;
- to enable the Scheme to communicate efficiently to Members by sending only relevant news, alerts and documents, and information about events which are relevant, to them.

#### **Lawful basis of processing**

The Scheme's existing contract/agreement between itself and its Members requires that Members provide their name, postal and email addresses, telephone etc to the Scheme. This contract/agreement means that the Scheme's lawful basis for processing Members' personal data is 'contract' and therefore the Scheme can process Members' personal data without their further consent.

## Categories and types of personal data processed

- Name, name and place of employment, postal and email addresses, telephone and other contact details will be processed;
- No sensitive or 'special category' personal data (ethnicity, sexuality, religious beliefs etc) is processed by the Scheme.

## Sources of personal data

- The Scheme obtains Members' personal data from existing contracts/agreements with Members;
- Members may themselves update their personal data on the Scheme's online system (My Account).

## Recipients of Members' personal data

- The Scheme's Board of Management, Data Controller and formally contracted Data Processors may access Members' personal data;
- Members' personal data will not be passed to any third party unless to the police under warrant or with the expressed permission of the Member;
- The Scheme will not transfer Members' personal data outside the UK.

## Data retention period

The Scheme will retain Members' personal data only for as long as each Member remains a Member of the Scheme; when a Member ceases to be a Member of the Scheme he/she must confirm this with the Scheme's Board of Management as specified in the Scheme's *Rules & Protocols* at which time all associated personal data will be irrevocably deleted.

In the case of submitted reports, the submitting Member's email address only will continue to be associated with such reports for as long as the report is retained by the Scheme; this is required where a report may be used for evidential purposes in legal proceedings.

## Members' rights

- Members can obtain a copy of all their personal data held by the Scheme; Members may access this at any time on the Scheme's online system (My Account) or may be obtained on application to the Data Controller (see **Contact Details** above).
- Members can correct any erroneous data at any time on the Scheme's online system (My Account) or may require the Scheme to correct any errors on their behalf.
- At the conclusion of their Membership, Members' personal data will be irrevocably deleted by the Scheme with the exception of email addresses associated with Incident reports (see **Data Retention Period** above) and may require the data Controller to confirm such deletion. Members have the right to complain about the Scheme to the Information Commissioners at <https://ico.org.uk/concerns/handling/>