

# PRIVACY NOTICE (OFFENDERS)

**This document describes our Scheme and explains why the Scheme processes the personal data of specific individuals (Offenders) and the lawful basis for that processing. It describes the kind of information about Offenders that the Scheme processes and what it does with that information.**

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

## **Contact details**

Michelle Baker, BID Manager,

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## **Purpose of Processing your personal data**

Members of the Scheme have the right to protect their property, staff and customers from crime and anti-social behaviour and to withdraw their implicit licence to enter their premises. The BID does not operate an exclusion scheme but individual Members of our Radio and DISC systems may do.

Any personal data is being processed because it is necessary for the effective management of the scheme.

## **Categories of Individuals processed**

We use the DISC system which contains details of individuals and is fully compliant with the GDPR Regulations 2019

## **Lawful basis for processing**

The Scheme Members have a 'legitimate interest' to process your personal data for this purpose described above. This means that, subject to you being reported by any

Members for an incident which represents a threat to their property, staff or customers, your data may be processed without your consent.

### **Categories of Personal Data**

Using DISC, we and our Members may process the following categories of your data:

- your name and facial image and any relevant information about the nature of your activities so that our Members can identify you, submit reports about you, include you in a list or gallery of reported or excluded persons and, if appropriate, ensure our Members are aware of any threat you may represent to their property or to the safety of their staff, customers etc;
- Your postal and email addresses, telephone number(s) and other contact detail so our Board of Management can communicate relevant information with you from time to time;
- Your ethnicity so we can help our Members identify a known Offender in order to submit a report about them, or to identify prolific or travelling offenders;
- Information and evidence about incidents in which you have been involved, where this can assist in preventing or detecting unlawful acts.

### **Categories of Recipients**

We may circulate your personal information among:

- Members of the Scheme;
- Employees and officers of public agencies involved in the prevention and detection of crime;
- Other organisations like us in neighbouring areas if there is evidence that you have participated, or are likely to participate, in any threat or damage to property, staff and customers in areas outside the Scheme's area of operation.

### **Retention and erasure policy**

If you are reported by a Member for participating in any threat or damage to any Member's property, staff or customers, your name and facial image may be shared among Members using DISC for 12 months after which it will be withdrawn from Members; it will be retained for a further 12 months in our database after which time it will be irrevocably erased.

Beyond those time limits Members will have their own policies which must comply with the latest data protection requirements.

### **The source of your data**

We and our Members may collect your personal data from:

- Yourself;
- Members of the Scheme;
- Police or other public agencies.

### **Your rights**

- You have the right to object to the fact that we are processing your personal data at all, to require a copy of all the data that we hold about yourself, and to require that we correct any of it which you can show is incorrect. You should submit your objections and requests for a copy of your personal data to the Data Controller whose contact details are above.
- If you are not satisfied with the responses you receive from the Data Controller, you may submit a complain to the UK Information Commissioners Office. For more information and to submit your complaint online, visit <https://ico.org.uk/concerns/handling/>