

Solihull BID

Privacy Policy for
BID Levy Payers
& BID Businesses

Introduction

This policy sets out the different areas where BID levy payers and BID businesses privacy is concerned and outlines the obligations & requirements of the Solihull BID.

Furthermore, the way Solihull BID processes, stores and protects this data and information in relation to how the data is obtained will also be detailed within this policy.

Solihull BID

Solihull BID takes a proactive approach to privacy and ensure the necessary steps are taken to protect the privacy of its levy payers and businesses. Solihull BID complies with all UK national laws and requirements for user privacy.

Personal information

Solihull BID was elected into being in July 2010 and then re-elected for a second term in November 2014. Solihull BID is engaged by the levy payers and businesses within the Solihull BID area until 31st July 2020. Solihull BID was voted in following consultation with all parties under the terms of the Solihull BID Business Plan. Solihull BID is managed by a board of directors from within the BID area. To get to this point Solihull BID had to obtain data in relation to all levy payers and businesses within the defined area and some of this data would be classified as “personal” under the terms of the new General Data Protection Regulations 2017 (GDPR). We use this information to comply with the Business Improvement Districts (England) Regulations 2004.

Under the new General Data Protection Regulations (GDPR) Solihull BID are processing your data under the following condition:

Condition 3 – Legal Obligation.

Article 6(1)(c) provides a lawful basis for processing where:

“processing is necessary for compliance with a legal obligation to which the controller is subject.”

In this case Solihull BID has to comply with Business Improvement Districts (England) Regulations 2004 (<http://www.legislation.gov.uk/uksi/2004/2443/contents/made>) which sets out clear guidelines for BID’s and their duties and responsibilities in relation to all those persons who are liable for the BID levy and to ensure that they have received the necessary information about the operation of the BID and how their money is being spent.

Schedule 4 Regulation 15 of the legislation details the minimum amount of information that is required to be given.

Information collection and use

How do we collect information?

Solihull BID collects information in the following ways:

a. When you directly give it to us (“Directly Provided Data”)

When businesses are visited by a member of the BID Team to keep the business informed of the activities being undertaken by BID and a dedicated point of contact is identified by that business to receive the information. All this information requires a direct action by you at that time in order for us to receive it.

b. When data is provided by the Local Authority

Under the BID Regulations the Local Authority has to provide Solihull BID with details of all businesses within the BID area that are held on their National Non Domestic Rates (NNDR) list. This is to allow for the ballot process to take place as well as enabling the billing of the levy to businesses following a successful ballot. This list is also used to keep levy payers apprised of BID activity and how the BID income is being spent.

How long do we keep your data for?

Solihull BID will not retain your personal information longer than necessary. In the case of the dedicated business contact that data is held whilst you are still in that capacity. Upon notification of you leaving the business, BID area or are no longer the contact we will erase your personal data from our records. In relation to levy payer details we have a regulatory requirement to hold that data whilst you remain a levy payer within the Solihull BID area.

If legally required or if it is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud and abuse, we may also retain some of your information for a limited period of time as required, even after you have ceased to be a levy payer within the BID area.

Levy payer database

Solihull BID will not sell or rent your personally identifiable information, gathered as a result of the above process, to anyone.

Solihull BID will not share any personal data collected during the above process with anyone, except for the purposes of organising a ballot or the collection of BID levy. In those cases the data will be shared with the relevant Local Authority under the terms of a Data Sharing Agreement.

Choosing how we use your data

We understand that you trust us with your personal information and we are committed to ensuring you can manage the privacy and security of your personal information yourself.

With respect to the information relating to you that ends up in our possession, and recognising that, in relation to the BID business dedicated point of contact, it is your choice to provide us with your personally identifiable information, we commit to giving you the ability to do all of the following:

- You can verify the details you have submitted to Solihull BID by contacting our Data Controller on datacontroller@solihullbid.co.uk. Our security procedures mean that we may request proof of identity before

we reveal information, including your e-mail address and your business address.

- You can also contact us by the same method to change, correct, or delete your personal information controlled by Solihull BID regarding your profile at any time. Please note though that, if you have shared any information with others through social media channels, that information may remain visible, even if your account is deleted.
- You can always feel free to update us on your details at any point by the same contact method or by emailing any changes to info@solihullbid.co.uk
- You can request a readable copy of the personal data we hold on you at any time. To do this, please contact us on datacontroller@solihullbid.co.uk
- Solihull BID will process your personal data in line with the Data Protection Act 2017. However, if you are unhappy with the way we have processed your data please contact our Data Controller: datacontroller@solihullbid.co.uk
- You also have the right to complain to the Information Commissioners Office: <https://ico.org.uk/for-the-public/>

Please note, we are constantly reviewing how we process and protect data. Therefore, changes to our policy may occur at any time. We will endeavour to publicise any changes.