

Better Bankside Privacy Notice

Introduction

Better Bankside (“BB”) is committed to meeting the new data protection laws by being transparent about how we collect and use personal data.

This notice outlines how we collect and use your information, and tells you about your privacy rights and how the law protects you.

This general privacy notice supplements other more specific privacy notices and is not intended to override them.

Why do we need to process your data?

As a Business Improvement District (“BID”), we need to process data to pursue legitimate business interests, for example, to send business or marketing communications (such as information about events), for the provision of services, for invoicing purposes, to prevent fraud, for administrative purposes or for reporting potential crimes.

Data collected and/or stored by BB is for the sole purposes of BB business and the relationship between BB and its member businesses.

We will never process data where these interests are overridden by an individual’s own interests.

What information do we collect?

- Your name, title, email addresses
- Business information such as job title, name of employer, details of business including postal address and telephone number
- Records of email correspondence
- Records of attendance at Better Bankside events
- Record of Better Bankside services you or your organisation has taken up
- Financial details
- Personal information supplied as part of the recruitment process
- Information from cookies on our website including IP address, browser type and version, approximate location, device type, time zone setting, operating system and platform

How do we collect your data?

Data is collected from many sources such as;

- From you directly
- Business meetings e.g. exchange of business cards
- Correspondence with you
- Buzz card registration
- Subscription to newsletters
- When you attend a Better Bankside event, either at our offices or in another location
- From cookies and web forms when you visit our website

How do we use your data?

We may use your information for a number of reasons. This may include, but is not limited to:

- To send you email communications if you have signed up to the Better Bankside bulletin/newsletter
- To seek your views or comments on the services we provide
- To respond to an enquiry if you have contacted us directly
- To inform you of an event, service or project that might be relevant to you or your organisation
- To inform you of an incident or happening in the area that may affect you or your organisation
- To communicate with you regarding a service you are already signed up to
- To inform you of a forthcoming ballot
- For invoicing/levy collection purposes
- To understand how individuals use our website and to give you a good user experience on our website
- To operate our Customer Relationship Management system (CRM)
- If you have requested to attend a networking event we are organising we may circulate a delegate list to all attendees prior to the event in order to better facilitate networking. This would only contain name and company name

We keep a 'do not contact' list, if you request that Better Bankside does not make contact with you, we will ensure you are added to this list.

Who do we share your data with?

Your information will only be shared with employees of Better Bankside in the performance of their duties.

No member of staff or group will share any individual's personal data with a third party without the prior consent of the individual.

We may pass your information to our third party service providers, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf.

This includes;

- Organisations involved in the BID ballot process e.g. Electoral Reform Society, Southwark Council
- Businesses contracted to provide marketing services e.g. email marketing software Pure360 and CRM system Sugar CRM and Sugabyte
- Businesses contracted to provide waste management
- Wardens
- Organisations carrying out independent research on our behalf

When we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes. Please be reassured that we will not release your information to third parties beyond this for them to use for their own direct marketing purposes, unless you have requested us to do so.

As part of the tender process, due diligence will be carried out with new suppliers to ensure they are GDPR compliant.

What is the lawful basis for processing your data?

For processing to be fair and lawful, one of the following legal grounds must apply. We will only process personal data if:

- You have given consent. For example, you have requested to receive one of our e-newsletters.
- Processing is necessary to perform a contract with you. For example, you have registered to use our Cycle Park.
- Processing is necessary for BB to comply with a legal obligation. For example, providing named contacts to the Electoral Reform Society so that ballot papers can be issued.
- Processing is necessary for the performance of a task BB carries out in the public interest.
- Processing is necessary for the purposes of BB's legitimate interest (except where that interest is overridden by the rights and freedoms of the individual).

Whenever BB uses personal data, it will be for a specific and legitimate purpose and we will tell the individual what that purpose is.

How long will we keep data for?

We will not keep data longer than it is needed for the purpose for which it was collected. Where possible, we will erase or anonymise information which we do not need any more.

- Financial records will be kept for at least seven years from the end of the last company financial year they relate to, or longer if they show a transaction that covers more than one accounting period.
- Once an individual's relationship with BB has become inactive, for example when they have left their company, personal data will be archived for purposes of tracking engagement with the business that individual was employed by.
- For recruitment candidates, hard copies of CVs and cover letters are shredded once appointed. Interview notes are kept for a period of six months.
- Unsuccessful candidates' applications for employment will be kept on file and stored electronically for a period of six months to respond to any discrimination claim that could be brought against BB. It is in the legitimate interest of the organisation to keep these in order to defend any of these potential claims.
- Employee immigration checks will be kept for at least seven years after termination of employment.
- Contracts of employment with BB, including changes and updates, and any collective workforce agreements will be kept for at least seven years after the contract ends.
- Employee payroll, wage records, PAYE records, records of advances such as for season travel tickets and records in relation to hours worked will be retained for at least seven years from the date the employment ends.
- Once final payments have been made, employee bank details will be deleted within 30 days after the end of employment.
- Personnel records such as references, qualifications, annual leave records, assessment reports, disciplinary or grievance procedures, resignation, termination or retirement records will be kept for at least seven years after employment ends.

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- Maternity records will be deleted after at least four years from the end of the tax year in which the maternity leave ends.
- Any record of an employee having an accident or injury at work will be kept for at least ten years from the date the report was made.

Your rights

You have a number of rights with regard to personal data:

- The right to request access to personal data. You have the right to know that your data is being processed. You can submit a Subject Access Request (SAR) to get access to your personal data. BB will verify your identity requesting before granting access. BB will provide a copy of the personal data free of charge, but if you make multiple requests for the same information we may charge you. We will respond to a SAR within one month, unless the request is particularly complex in which case we may extend by up to two months. If we think a request is wholly unfounded or excessive, we may also charge a fee, or refuse to respond.
- The right to request to correct and update any information we hold about you. Where we have disclosed data to third parties, we will tell them to correct their copy as well.
- The right to erasure of your personal data. If you feel we should no longer be holding your data or if you withdraw your consent, you can request we erase it. BB can refuse a request to erase but we will provide the reason why (for example, if we need it for a legitimate business interest). If BB has passed on the personal data to third parties, we will inform them of the erasure as well where possible.
- The right to restrict processing. If processing is restricted, we will store just enough information to ensure that the restriction is respected in future.
- The right to object to processing
 - Individuals have the right to object to:
 - Processing based on legitimate interests or the performance of a task in the public interest;
 - Direct marketing;
 - BB will stop processing the individual's personal data unless the processing is for bringing or defending legal claims, or, where we can demonstrate compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the individual.
 - Where personal data is processed only for direct marketing purposes, we will stop processing personal data for direct marketing purposes as soon as an objection is received.
 - Where the processing is necessary for the performance of a public interest task, we are not required to comply with an objection to the processing of the data.
- The right to data portability.
- The right to withdraw consent at any time.
- the right to lodge a complaint with the Information Commissioner's Office (ICO).

Contact and complaints

If you have any questions or concerns as to how your data is processed you can contact: Rahima Begum, Office Manager at rb@betterbankside.co.uk / info@betterbankside.co.uk or you can write to Better Bankside, 18 Great Guildford Street, London SE1 0FD.

You have the right to lodge a complaint to the Information Commissioners' Office if you believe that we have not complied with the requirements of the GDPR or DPA 2018 in regards to your personal data. The Information Commissioner can be contacted at:

The Information Commissioner,

Wycliffe House,

Water Lane,

Wilmslow

Cheshire SK9 5AF

Telephone: Switchboard: 01625 545 700

Data Protection Help Line: 01625 545 745

Notification Line: 01625 545 740

Email: mail@ico.gsi.gov.uk

For further details on your rights visit <https://ico.org.uk/for-the-public/>