

INTRODUCTION

Welcome to Aldgate Connect Business Improvement District (BID)'s privacy notice.

The Aldgate Connect BID respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after any personal data we collect from you or that you provide to us and tell you about your privacy rights and how the law protects you.

1 Important information and who we are

1.1 Purpose of this privacy notice

This privacy notice sets out the basis on which we will process any personal data we collect from you, or that you provide to us.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice 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. This privacy notice supplements the other notices and is not intended to override them. For the purpose of applicable data protection legislation we are the data controller of the data that you provide to us. You can contact us by emailing us at nickipalmer@primera-corp.co.uk.

The Aldgate Connect BID is the controller and responsible for your personal data (referred to as "we", "us" or "our" in this privacy notice).

We have appointed a Data Protection Manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the Data Protection Manager using the details set out below.

1.2 Contact details

Our full details are:

Full name of legal entity:	The Aldgate Partnership
Name or title of Data Protection Manager:	Nicki Palmer
Email address:	nickipalmer@primera-corp.co.uk
Postal address:	38-39 St Johns Lane, Farringdon, London EC1M 4BJ
Telephone number:	07944 386903

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (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.

1.3 Changes to the privacy notice and your duty to inform us of changes

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.

1.4 Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2 The data we collect about you

2.1 Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

2.2 The personal data we collect includes but is not limited to: name, email address, postal address, telephone number, the company you work for, job title and the industry you work in.

2.3 We collect additional information from employees, as set out in our Privacy Notice for Employees, Workers and Contractors.

2.4 For Business Improvement District levy payers the information we collect may include:

2.4.1 Contact Data including name, billing address, delivery address, email address, telephone numbers and job title.

2.5 For potential business partners and business intermediaries, the BID team or other clients or members of the business community who access our business expertise, the information we collect may include:

2.5.1 Contact Data including name, billing address, delivery address, email address, telephone numbers and job title.

2.6 For advisors, professional experts, consultants, contractors and other third party suppliers, the information we collect may include:

2.6.1 Contact Data including billing address, delivery address, email address, telephone numbers and job title.

2.6.2 Bank account information, transaction details and history for payment of invoices.

2.6.3 Details of the companies the individuals work for.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose when you access our website. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

2.7 If you fail to provide personal data

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.

3 How is your personal data collected?

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

3.1 **Direct interactions** -You may give us your corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- 3.1.1 apply for or make enquiries about our projects or services to the business community on behalf of the BID events;
- 3.1.2 are registered as a new business contact of Aldgate Connect BID;
- 3.1.3 attend Aldgate Connect BID events;
- 3.1.4 subscribe to our newsletter or loyalty programmes;
- 3.1.5 request marketing to be sent to you;

3.2 **Automated technologies or interactions** – We may collect aggregated data such as statistical data when you access our website.

3.3 **Technical Data** from the following parties:

- 3.3.1 Google Analytica

3.4 Contact, Financial and Transaction Data from providers of technical, payment and delivery services.

3.5 Identity and Contact Data from publicly available sources such as Companies House.

4 How we use your personal data

4.1 We will use your personal information

- 4.1.1 To register you and contact you after you have registered your interest with our organisation
- 4.1.2 To provide you with services or information you have requested
- 4.1.3 To maintain our own accounts and records
- 4.1.4 To obtain survey results or request feedback on our services.

5 Our lawful basis for processing

5.1 We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- 5.1.1 Where we need to perform the contract we are about to enter into or have entered into with you.
- 5.1.2 Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- 5.1.3 Where we need to comply with a legal or regulatory obligation.

5.2 Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

5.3 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. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

6 Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

6.1 Marketing communications

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased services from us and, in each case, you have not opted out of receiving that marketing

6.2 Opting out

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

6.3 Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please contact us to request our cookies policy.

6.4 Change of purpose

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.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

7 Disclosures of your personal data

7.1 We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

7.1.1 Internal third parties

- (a) Pension providers

7.1.2 External Third Parties as set out below:

- (a) Eventbrite
- (b) Mailchimp
- (c) Survey monkey

7.1.3 Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

7.2 We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

8 International transfers

- 8.1 We transfer your personal data outside the European Economic Area (EEA) as some of our data is hosted on US servers, so the processing of data by these external third parties will involve a transfer of data outside the EEA.
- 8.2 Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards are implemented:
- 8.2.1 We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
 - 8.2.2 Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
 - 8.2.3 Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.
- 8.3 Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

9 Data security

- 9.1 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. encrypted storage and access controls 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.
- 9.2 We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

10 Data retention

- 10.1 How long will you use my personal data for?
- 10.1.1 We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
 - 10.1.2 To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we

process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

- 10.1.3 Details of retention periods for different aspects of your personal data are available on request by contacting us.
- 10.1.4 In some circumstances you can ask us to delete your data: see Request erasure below for further information.
- 10.1.5 In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

11 Your legal rights

11.1 Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- 11.1.1 **Request access** to your personal data (commonly known as a '**data subject access request**'). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- 11.1.1 **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- 11.1.2 **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- 11.1.3 **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- 11.1.4 **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

11.1.5 **Request the transfer of** your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

11.1.6 **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us at nickiapalmer@primera-corp.co.uk or in writing at the office address at the beginning of this policy document.

11.2 No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

11.3 What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

11.4 Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

12 Glossary

12.1 Lawful Basis

12.1.1 **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us

- 12.1.2 **Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- 12.1.3 **Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.