



## PRIVACY NOTICE (OFFENDERS)

This document describes the CITYCO MCR BUSINESS CRIME PARTNERSHIP (the Partnership), explains why the Partnership 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 Partnership processes and what it does with that information.

### Contact details

CityCo Business Crime Unit  
Suite 4b, Blackfriars House  
Parsonage  
Manchester  
M3 2JA  
Email address: [BCUreporting@cityco.com](mailto:BCUreporting@cityco.com)  
Tel: 0161 8383267

The Partnership'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 Partnership is registered with the Information Commissioners Office as a **Business Crime Reduction Partnership**.

### Purpose of processing personal data

Members of the Partnership have the right to protect their property, staff and customers from crime and anti-social behaviour and to exclude from their premises any individuals who are proven threats to their property, staff or customers. The Partnership processes Offenders' personal data for the specific purpose of managing its Exclusion Partnership on behalf of its Members.

The Partnership's area of operation, and its Exclusion Partnership, Manchester City Centre, Fort Retail Park, Urban Exchange Retail Park. Changes to the operational area will be informed to individuals who are subject to exclusion in writing.

### Types of processing

The Partnership undertakes the following types of processing of personal data of Offenders:

- **Data collection;** see **Sources of personal data** below;
- **Data storage;** storage of Offenders' data in a facility independently certified as secure to a high standard;
- **Data retention;** see **Data Retention period** below;
- **Data collation;** associating individual Offenders with multiple incidents, and with other Offenders;
- **Data sharing;** as defined in **Recipients, or categories of recipients, of personal data** below;
- **Data deletion;** see **Data Retention period** below;
- **Data analysis;** of de-personalised data for historical comparisons etc.



## Lawful basis of processing

The Partnership's Members' 'legitimate interests' provides the lawful basis on which it may process specific items of Offenders' personal data for specific purposes without Offenders' consent.

The Partnership has assessed the impact of its processing on Offenders' rights and freedoms, has balanced these with its Members' own rights, and has concluded that its Members' rights prevail over Offenders' rights in this specific matter. Therefore, for the specific purpose of managing an exclusion partnership, Members' legitimate interests constitute the Partnership's lawful basis for processing Offenders' personal data without requiring consent.

## Categories and types of personal data processed

- **Offender's name and facial image and any relevant information about the nature of his/her activities;** the purpose of this processing is to enable Members to identify Offenders in order to submit reports about them, to include them in a list or gallery of excluded persons (if appropriate and in line with the Partnership's Rules & Protocols), and to provide information about them which may be necessary to protect the personal safety of Members and their staff, customers etc. This data may be shared among Members;
- **Offenders' postal , Email address , telephone number(s) and other contact details;** the purpose of this processing is to enable the Partnership to communicate with Offenders from time to time, for example to send data notifications / confirmation of exclusions, definition of exclusion, or confirmation that exclusions have expired. **Such data will not be shared with Members;**
- Your **ethnicity** so we can assist our Members to 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 an Offender has been involved;** the purpose of this processing is to enable the Partnership to defend its legal rights against any claim or suit by an Offender or other party.

## Sources of personal data

Offenders' personal data may be provided to the Partnership by:

- **Offenders** who may voluntarily offer information about themselves;
- **Members** who may submit reports about incidents in which Offenders have been involved. They may also send relevant 'intelligence' about Offenders, for example they may provide a name when asked to identify an unidentified CCTV image;
- **Police or other public agencies** may provide Offenders' personal data under a formal Information Sharing Agreement.



## Recipients or categories of recipients, of personal data

The following types of individuals may have access to the Partnership's data, including Offenders' personal data:

- **Members** who are property owners, agents or their employees working within the operational area of the Partnership who share the same legitimate interests;
- **Employees and officers of public agencies** involved in the prevention and detection of crime, such as police, whose lawful basis for processing your data is their public task;
- **Data Controllers of other organisations, similar to the Partnership**, in neighbouring areas if there is evidence that an Offender has participated, or is likely to participate, in any threat or damage to property, staff and customers in areas outside the Partnership's area of operation.
- The Partnership will not transfer Offenders' data outside the UK.

## Data retention period

When an Offender is reported by a Member for participating in any Loss, threat or damage to any Member's property, staff or customers, his/her name and facial image may be shared among Members for 12 months. If no further report is submitted during that period, the Offender's data will be withdrawn from Members at the expiry of that period. It will be retained for a further 12 months in the Partnership's database (which can only be accessed by the Data Controller) after which time it will be irrevocably deleted.

If during the 12 months when an Offender's data is circulated among Members he/she is reported for another incident involving a Loss, threat or damage to any Member's property, staff or customers, his/her name and facial image will be circulated among Members for a further 24 months from the date of the second report. **Additionally, if the Offender meets criteria for exclusion they will be excluded from all the properties of all Members for 24 months, and this fact will be shared with Members and notified to the offender in writing.**

If no further report is submitted by a Member during that period, the Offender's data will be withdrawn from Members at the expiry of that period. It will be retained for a further 12 months in the Partnership's database (which can only be accessed by the Data Controller) after which it will be irrevocably deleted.

## Offenders' rights

Every Offender has the right to obtain a copy of all the personal data which the Partnership holds about him or her; to do so the Offender must contact the Data Controller (see contact details above); the Offender may be required to provide proof of his/her identity. In any case the Partnership will respond to the request within 30 days and provide full documentation to demonstrate compliance with Data Protection law.

If, when an Offender accesses his/her personal data, any of it is found to be incorrect, unnecessary or disproportionate, the Offender can require the Partnership to correct it. **Offenders do not have the right to require the Partnership to delete correct, necessary or proportionate information.**

Offenders have the right to complain about the Partnership to the Information Commissioners Office; Offenders can submit a complaint on the ICO's website at <https://ico.org.uk/concerns/handling/>



Manchester  
**BCRP**

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