

## PRIVACY NOTICE (SUBJECT)

This document describes the **CITYCO MCR BUSINESS CRIME PARTNERSHIP** (the Partnership), explains why the Partnership processes the personal data of specific individuals (Subjects) and the lawful basis for that processing. It describes the kind of information about Subjects that the Partnership processes and what it does with that information.

### Contact Details

- The Business Crime Manager
- CityCo Business Crime Unit, 5<sup>th</sup> Floor, St George's House Peter Street M2 3 NQ
- Email: [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 antisocial behaviour and to exclude from their premises any individuals who are proven threats to their property, staff or customers. The Partnership processes Subjects' 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 are within the City of Manchester & Salford Districts. 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 Subjects:

- **Data collection;** see **Sources of personal data** below.
- **Data storage;** storage of Subjects' data in a facility independently certified as secure to a high standard.
- **Data retention;** see **Data Retention** period below.
- **Data collation;** associating individual Subjects with multiple incidents, and with other Subjects.
- **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 Subjects' personal data for specific purposes without Subjects' consent. The Partnership has assessed the impact of its processing on Subjects' rights and freedoms, has balanced these with its members' own rights, and has concluded that its members' rights prevail over Subjects' 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 Subjects' personal data without requiring consent.

## Categories and types of personal data processed.

- **Subjects 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 Subjects 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.
- **Subjects' postal, Email address, telephone number(s) and other contact details;** the purpose of this processing is to enable the Partnership to communicate with Subjects 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 Subject' to submit a report about them, or to identify prolific or travelling Subjects.
- **Information and evidence about incidents in which a subject has been involved;** the purpose of this processing is to enable the Partnership to defend its legal rights against any claim or suit by a Subject or other party.

## Sources of personal data

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

- **Subjects** who may voluntarily offer information about themselves.
- **Members** who may submit reports about incidents in which Subjects have been involved. They may also send relevant 'intelligence' about Subjects, for example they may provide a name when asked to identify an unidentified CCTV image.
- **Police or other public agencies** may provide Subjects' 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 Subjects' 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 a Subject 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 Subjects' data outside the UK.

### Data retention period

When a Subject 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. **This will be determined on a case-by-case basis.** If no further report is submitted during that period, the Subjects' 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 permanently deleted.

If during the 12 months when a Subjects' 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 Subject' 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 permanently deleted.

The partnership will only retain Incident Data for 3 years from the date of submission. All incident data is then anonymised and only retained for analytical purposes.

### Subjects' rights

Every Subject has the right to obtain a copy of all the personal data which the Partnership holds about him or her; to do so the Subject' must contact the Data Controller (see contact details above); the Subject' 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 a Subject' accesses his/her personal data, any of it is found to be incorrect, unnecessary, or disproportionate, the Subject' can require the Partnership to correct it.

**Subjects do not have the right to require the Partnership to delete correct, necessary, or proportionate information.**

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

### ***Cookies***

Cookies are text files, which identify a user's computer to our server. Cookies in themselves do not identify the individual user, just the computer used. The CityCo website has a number of features that may require the use of cookies. We only use this Information to ensure users' preferences for viewing the website are maintained. Users may, of course, choose not to accept cookies from the CityCo website. This might mean that their browser will not remember that visitors have changed their preferred text size and/or members have logged in and they will therefore have to reselect their preferred text size and/or log in to have access to the Members Only pages on every visit to the CityCo website. Further information about cookies can be found at: [www.aboutcookies.org](http://www.aboutcookies.org)

### ***Links to other websites***

There may be hyperlinks within this website which will take you away from the Cityco website. The linked sites are not under the control of Cityco, and we are not responsible for the content of any linked site, or any link contained in a linked site, or any changes or updates to such sites. CityCo is providing these links to you only as a convenience, and the inclusion of any link does not imply endorsement by CityCo of these sites.

### ***Disclaimer***

CityCo seeks to ensure that all information on this website is accurate However, CityCo and its employees cannot accept any responsibility or liability for any claim, loss, or damage whatsoever from the use of any information within, or accessed through, this website.