



## The Marble Arch Partnership Privacy Policy

Marble Arch London BID was established following a successful ballot of businesses in February 2016. The legal basis for BIDs is set out in The Local Government Finance Act 2003 and The Business Improvement Districts (England) Regulations 2004.

The Marble Arch Partnership collects and processes personal information from three groups:

- BID levy paying companies;
- Stakeholders assisting us to deliver the BID's objectives;
- Individuals who sign up to receive our newsletter, via our website.

This privacy policy explains how we will process the personal data you provide us with and what we do with it.

**BID Levy Paying Companies:** BID levy paying company information is obtained in the first instance from Westminster City Council's revenue collection agent, Capita. This information shows a unique property reference number, rateable value, occupation dates, amount of BID levy due, payment history and billing address. The information comes to us in encrypted format, and is stored as a password protected file on a password protected server. This information is transferred to an ACT database, which is held on the same server and is password protected. We also add the following personal information to the ACT database, associating with the unique property reference; named voter and contact details, nominated security personnel, nominated marketing and sales personnel, nominated HR and CSR personnel, any executive support to these posts, plus the details of employees from these companies who have expressed an interest in the BID's services or attended BID training or events. We ask all new contacts for consent to add their details to our newsletter mailing list.

**Stakeholders:** In order to deliver the BID's objectives, we collect and process personal data (names and contact information) from key public and statutory agencies, such as Westminster City Council, Transport for London, the Greater London Authority, Metropolitan Police and local amenity societies. This data is held on an ACT database. We ask all new contacts for consent to add their details to our newsletter mailing list.

**Individuals who sign up to receive our newsletter via our website:** The newsletter sign-up section of the [www.marble-arch.london](http://www.marble-arch.london) website allows interested individuals to keep in touch with what the BID does. We do not transfer this information to the ACT database.

### The Marble Arch London BID website

Like many websites, The Marble Arch Partnership website uses 'cookies' to help us make our website – and the way you use them – better. Cookies mean that a website will remember you. They're small text files that sites transfer to your computer (or phone or tablet). They make interacting with a website faster and easier – for example by automatically filling your name and address in text fields.

In addition, the type of device you're using to access our websites or apps and the settings on that device may provide us with information about your device, including what type of device it is, what specific device you have, what operating system you're using and your device settings. Your device manufacturer or operating system provider will have more details about what information your device makes available to us. We use Google Analytics to track visits to our websites (e.g. which pages are visited the most), but this is not linked with personal information held in ACT, Mailchimp or Eventbrite.



Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information that you provide whilst visiting such sites, and such sites are not governed by this Privacy Policy.

### **How we use personal data**

The Marble Arch Partnership takes your privacy seriously and we will only use the personal information you provide us to send you information about Marble Arch London BID's projects and services.

### ***Our newsletter and invitations***

The Marble Arch Partnership only has access to the personal information that you voluntarily provide when you sign up to receive our newsletter or invitations and we only collect the information we require in order to distribute the electronic newsletter and invitations.

If your company or organisation has not previously subscribed to the newsletter, attended training or events or engaged with projects run by us, and/or is a new member to the Marble Arch London BID, we may email you separately to welcome you and offer our services.

When we email our subscribers, we track who opens the emails and clicks through the links. This allows us to measure the performance of our email campaigns.

Please note, The Marble Arch Partnership uses MailChimp and Eventbrite as our marketing automation platforms. The personal information you provide will be transferred to MailChimp for the monthly newsletter and Eventbrite for training and event invitations for processing in accordance with their Privacy Policy and Terms & Conditions.

The Marble Arch Partnership will contact you at the commencement of each BID term to confirm that you still wish to receive the monthly newsletter and invitations. If we do not hear from you, your personal information will be removed from newsletter mailings, but retained on the ACT database as part of our statutory requirement to consult BID levy payers under The Business Improvement Districts (England) Regulations 2004.

You may also opt out of receiving newsletter and invitation communications from us at any time by following the unsubscribe link at the bottom of each newsletter and invitation or by emailing [getinvolved@marble-arch.london](mailto:getinvolved@marble-arch.london).

### ***Day to day operations***

We regularly reach out to individuals in businesses or organisations about a project from which that company will benefit, or to seek your views and input on a potential project. We use contact information from our ACT database for this, and all emails from our staff team to contacts on our database are recorded. We may also make a record on ACT of important meetings held with voters, and – during a BID ballot or renewal ballot – the voting intention and status per voter.

### ***The Marble Arch Street Team***

Marble Arch London BID deploys a Street Team to tackle anti-social behaviour, improve the environment and to support businesses, their staff, guests and customers. The Street Team's activities are tracked using a system called P3, a bespoke platform operated by our suppliers Andrews International (a company registered in the United States of America). P3 is fully compatible with GDPR in the UK and certified by EU-US Privacy Shield, which allows the transfer of personal data between companies in the EU and the USA.



The Street Team records business interactions on P3. These only include the name and address of the business premises, not personal data. If your business calls the Street Team for urgent assistance, only the name of the business and the address of your premises is recorded. No personal information is transferred from P3 to our ACT database, nor to our newsletter and invitation mailing lists.

The Street Team wear overt body cameras on their jackets. These film serious incidents and record images of individuals for crime prevention purposes only. They also take photographs using hand held mobile devices. These images are held on P3 and only passed to the Metropolitan Police if a crime has been committed and the information is required for evidential purposes.

### **The lawful bases for collection and use of personal information**

The lawful bases for processing your data are legal obligation (The Business Improvement Districts (England) Regulations 2004), consent, performance of contract and/or legitimate interest.

The Marble Arch Partnership will not communicate, spread, publish, sell, rent or otherwise give your personal information to anyone.

### **Accessing information stored about you**

You may opt out of receiving newsletter communications from us at any time by following the unsubscribe link at the bottom of each newsletter or invitation or by emailing [getinvolved@marble-arch.london](mailto:getinvolved@marble-arch.london).

Please contact us on the email address above or in writing to the address below to request to:

- See what data we hold about you
- Update or correct any data we hold about you
- Request for the data we hold on you to be deleted
- Express any concerns you have about our use of your data

The Marble Arch Partnership may require a copy of appropriate evidence such as a passport, driving licence, recent bank statement or utility bill prior to responding to a subject access request, in order to verify your identity. The Marble Arch Partnership will respond to all requests related to your personal information within one month of receipt.

The Marble Arch Partnership, 7 Praed Street, London, W2 1NJ.

### **Security of personal information**

The Marble Arch Partnership has measures in place to protect personal information.

Only employees who need information to perform a specific job (e.g. distributing the newsletter or communicating with BID levy payers) have access to your personal information.

The computers and servers on which your personal information is stored are password protected with firewall controls and kept in a secure environment.

Any personal information stored on paper is locked away when not in use and disposed of after use securely using document shredders or confidential waste.

Any personal information you send to us in writing or by email may be insecure during transit and The Marble Arch Partnership cannot guarantee its delivery.



### **Updates to the Privacy Policy**

Any updates made to The Marble Arch Partnership Privacy Policy will be shown on this page and communicated to you via the monthly newsletters.

### **Our contact details**

The Marble Arch Partnership is registered in England under company number 8164848.

The registered office of this company is The Marble Arch Partnership, 7 Praed Street, London W2 1NJ.

If you have any concerns or questions about this Privacy Policy, please contact us by calling the main office on 020 3145 1210 or by emailing [getinvolved@marble-arch.london](mailto:getinvolved@marble-arch.london).

*Last updated 17 May 2018*

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