

Privacy Policy

Sunderland Business Improvement District LTD

Updated on 24/05/18

Review due: 24/05/19

**Sunderland's
Business
Improvement
District**



PRIVACY POLICY

Sunderland Business Improvement District Ltd ("We") are committed to protecting and respecting your privacy.

This policy (together with our [terms of use](#)) and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting <https://www.sunderlandbid.co.uk> you are accepting and consenting to the practices described in this policy.

For the purpose of the General Data Protection Regulations (the **Act**), the Data Controller is Sunderland Business Improvement District Ltd of 27/28 Frederick Street, Chester Road, Sunderland, Tyne & Wear, SR1 1LZ.

INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- **Information you give us.** You may give us information about you by filling in forms on our site <https://www.sunderlandbid.co.uk> (**our site**) or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our site, subscribe to our service, search for an event or offer, purchase tickets on our site, participate in discussion boards or other social media functions on our site, enter a competition, promotion or survey, download a voucher and other activities and when you report a problem with our site. The information you give us may include your name, address, e-mail address and phone number, financial and credit card information, personal description and photograph.
- **Information we collect about you.** With regard to each of your visits to our site we may automatically collect the following information:
 - technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
 - information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
- **Information we receive from other sources.** We may receive information about you if you use any of the other websites we operate or the other services we provide. In this case we will have informed you when we collected that data that it may be shared internally and combined with data collected on this site. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical,

payment and delivery services, advertising networks, analytics providers, search information providers) and may receive information about you from them.

COOKIES

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

INFORMATION ABOUT OUR USE OF COOKIES

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

And specifically for:

- **Google Analytics** - This is in order to track anonymised user data for statistical purposes.
- **ShareThis** - This is used for anonymous data captured by the sharing buttons system on the site and to help with its functionality in terms of sharing pages the user is visiting.
- **Drupal** - In order to manage login, sessions and various other features, the Drupal system adds a cookie to visitors computers. This is anonymous and used purely to provide functionality.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

USES MADE OF THE INFORMATION

we use information held about you in the following ways:

- **Information you give to us.** We will use this information:
 - to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
 - to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
 - to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which we collect your data (the registration form);
 - to notify you about changes to our service;
 - to ensure that content from our site is presented in the most effective manner for you and for your computer.
- **Information we collect about you.** We will use this information:
 - to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
 - to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
 - to allow you to participate in interactive features of our service, when you choose to do so;
 - as part of our efforts to keep our site safe and secure;

- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.
- **Information we receive from other sources.** We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

DISCLOSURE OF YOUR INFORMATION

We may share your information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you.
- Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in SW1). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.
- Analytics and search engine providers that assist us in the improvement and optimisation of our site.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If Sunderland Business Improvement District Ltd or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use. If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our [website terms of use](#) and other agreements; or to protect the rights, property, or safety of Sunderland Business Improvement District Ltd, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection.

WHERE WE STORE YOUR PERSONAL DATA

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

YOUR RIGHTS

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at Sunderland Business Improvement District, Sunderland Software Centre, Tavistock Place, Sunderland, SR1 1PB **OR** info@sunderlandbid.co.uk.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

The 'Right of Access'

Under the Data Protection Act 1998 and the GDPR, individuals have the right to obtain:

- confirmation that their data is being processed;
- access to their personal data; and
- other supplementary information

Sunderland Business Improvement District Ltd will provide a copy of the information free of charge. However, Sunderland Business Improvement District Ltd may charge a reasonable fee or refuse to respond when a request is manifestly unfounded or excessive, particularly if it is repetitive. Sunderland Business Improvement District Ltd may also charge a reasonable fee to comply with requests for further copies of the same information.

The fee will be based on the administrative cost of providing the information.

Information will be provided without delay and at the latest within one month of receipt. Sunderland Business Improvement District Ltd may extend the period of compliance by a further two months where requests are complex or numerous. If this is the case, Sunderland Business Improvement District Ltd must inform the individual within one month of the receipt of the request and explain why the extension is necessary.

Where staff and/or associates refuse to respond to a request, they will explain why to the individual, informing them of their right to complain to the supervisory authority (ICO) and to a judicial remedy without undue delay and at the latest within one month.

In responding to a request, Sunderland Business Improvement District Ltd will verify the identity of the person making the request, using reasonable means. If the request is made electronically, Sunderland Business Improvement District Ltd may provide the information in a commonly used electronic format.

Data subjects should contact the PCM to correct or request information that Sunderland Business Improvement District Ltd holds about them.

The 'Right to Rectify Inaccuracies'

Sunderland Business Improvement District Ltd will ensure that any personal data they process is accurate, adequate, relevant and not excessive, given the purpose for which it was obtained. They will not process personal data obtained for one purpose for any unconnected purpose unless the individual concerned has agreed to this or would otherwise reasonably expect this.

Individuals may ask that Sunderland Business Improvement District Ltd correct inaccurate personal data relating to them. If an individual believes that information is inaccurate they should record the fact that the accuracy of the information is disputed and inform the Privacy and Compliance Manager.

The 'Right to Request Data Portability'

The right to data portability allows individuals to obtain and reuse their personal data for their own purposes across different services. It allows them to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability.

The right to data portability only applies:

- to personal data an individual has provided to a controller;
- where the processing is based on the individual's consent or for the performance of a contract; and
- when processing is carried out by automated means.

Sunderland Business Improvement District Ltd must provide the personal data in a structured, commonly used and machine readable form. Open formats include CSV files. Machine readable means that the information is structured so that software can extract specific elements of the data. This enables other organisations to use the data.

The information must be provided free of charge.

If the individual requests it, Sunderland Business Improvement District Ltd may be required to transmit the data directly to another organisation if this is technically feasible. However, staff and associates are not required to adopt or maintain processing systems that are technically compatible with other organisations.

If the personal data concerns more than one individual, Sunderland Business Improvement District Ltd must consider whether providing the information would prejudice the rights of any other individual.

Sunderland Business Improvement District Ltd must respond without undue delay, and within one month. This can be extended by two months where the request is complex or Sunderland Business Improvement District Ltd receives a number of requests. Staff and associates must inform the individual within one month of the receipt of the request and explain why the extension is necessary.

Where Sunderland Business Improvement District Ltd is not taking action in response to a request, they must explain why to the individual, informing them of their right to complain to the supervisory authority (ICO) and to a judicial remedy without undue delay and at the latest within one month.

The 'Right to be Forgotten'

The right to erasure is also known as 'the right to be forgotten'. The broad principle underpinning this right is to enable an individual to request the deletion or removal of personal data where there is no compelling reason for its continued processing.

The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where the personal data are no longer necessary in relation to the purposes for which they were collected or the data subject withdraws consent.

If Sunderland Business Improvement District Ltd has disclosed the personal data in question to third parties, it must inform the data subject about the erasure of the personal data, unless it is impossible or involves disproportionate effort to do so.

The 'Right to Object'

Individuals have the right to object to:

- processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
- direct marketing (including profiling); and
- processing for purposes of scientific/historical research and statistics.

If data is processed for the performance of a legal task or an organisation's legitimate interests, individuals must have an objection on "grounds relating to his or her particular situation", Sunderland Business Improvement District Ltd must stop processing the personal data unless:

- it can demonstrate compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the individual; or
- the processing is for the establishment, exercise or defence of legal claims.

If data is processed for direct marketing purposes, Sunderland Business Improvement District Ltd must inform individuals of their right to object "at the point of first communication" and in Sunderland Business Improvement District Ltd's privacy notice. This must be "explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information". Sunderland Business Improvement District Ltd must stop processing personal data for direct marketing purposes as soon as they receive an objection. There are no exemptions or grounds to refuse. Staff and associates must deal with an objection to processing for direct marketing at any time and free of charge.

If data is processed for research purposes, individuals must have "grounds relating to his or her particular situation" in order to exercise their right to object. If staff and associates are conducting research where the processing of personal data is necessary for the performance of a public interest task, they are not required to comply with an objection to the processing.

If data is processed outside of any of the above categories and is carried out online, Sunderland Business Improvement District Ltd must offer a way for individuals to object online.

The 'Right to Restrict Processing'

Individuals have a right to 'block' or suppress processing of personal data. When processing is restricted, staff and associates are permitted to store the personal data, but not further

process it. They can retain just enough information about the individual to ensure that the restriction is respected in future.

Staff and associates are required to restrict the processing of personal data in the following circumstances:

- Where an individual contests the accuracy of the personal data, Sunderland Business Improvement District Ltd should restrict the processing until the individual has verified the accuracy of the personal data.
- Where an individual has objected to the processing (where it was necessary for the performance of a public interest task or purpose of legitimate interests), and staff and associates are considering whether the organisation's legitimate grounds override those of the individual.
- When processing is unlawful and the individual opposes erasure and requests restriction instead.
- If Sunderland Business Improvement District Ltd no longer needs the personal data but the individual requires the data to establish, exercise or defend a legal claim.

If Sunderland Business Improvement District Ltd has disclosed the personal data in question to third parties it must inform them about the restriction on the processing of the personal data, unless it is impossible or involves disproportionate effort to do so.

Sunderland Business Improvement District Ltd must inform individuals when it decides to lift a restriction on processing.

THE RIGHT TO COMPLAIN

If you feel that Sunderland Business Improvement District Ltd has breached the General Data Protection Regulations, you have the right to make a complaint to the Information Commissioner's Office.

ACCESS TO INFORMATION

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act.

CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Sunderland Business Improvement District, Sunderland Software Centre, Tavistock Place, Sunderland, SR1 1PB **OR** info@sunderlandbid.co.uk.