



Privacy notice for members

Introduction

GO! Southampton (referred to as “GO! Southampton” “**We**”, “**Our**” or “**Us**”) are committed to protecting the privacy and security of your Personal Data.

We have developed this Privacy Notice to inform you of the data we collect from you as a “Member”. It is important that you read this notice, along with our other privacy notices as applicable, so that you are aware of how and why we are using such information.

Definitions

For the purposes of this notice:

Company (referred to as “GO! Southampton”, “the Company”, “**We**”, “**Us**” or “**Our**” in this Agreement) refers to GO! Southampton Network Eagle Lab, Portland Terrace, Southampton, SO14 7SJ registered with the ICO under ZA363052.

Data Controller for the purposes of both UK and EU GDPR, refers to the Company as the legal person which alone or jointly with others determines the purposes and means of the processing of Personal Data. For both UK and EU GDPR, the Company is the Data Controller.

Data Processor for the purposes of both UK and EU GDPR, refers to the Company’s Service Providers.

Data Protection Legislation refers to the UK General Data Protection Regulation (UK GDPR) and The Data Protection Act 2018.

Member means owners or lessees of commercial property, including their staff or agents, who offer an implicit licence to the public to enter their property. This also includes any business who are a member of the Southampton Business Crime Partnership.

Personal Data is any information that relates to an identified or identifiable individual. For the purposes of both UK and EU GDPR, Personal Data means any information relating to you such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity.

Data Protection Legislation

Throughout this document we refer to Data Protection Legislation.

Where data is processed by a controller or processor established in the European Union (EU) or comprises the data of people in the European Union, it is subject to the General Data Protection Regulation (Regulation (EU) 2016/679) ('EU GDPR') as well as any local data protection implementation laws. This includes any replacement legislation coming into effect from time to time.

In the United Kingdom (UK), Data Protection Legislation means the Data Protection Act 2018 ('DPA 2018'), United Kingdom General Data Protection Regulation ('UK GDPR'), the Privacy and Electronic Communications (EC Directive) Regulations 2003 ('PECR') and any legislation implemented in connection with the aforementioned legislation.

GO! Southampton SBCP is the Data Controller ('controller') for the Personal Data we process, unless otherwise stated.

You can contact us either by phone, email, or post.

Our main trading/postal address:

GO! Southampton

Southampton Business Improvement District Ltd
Network Eagle Lab
Portland Terrace
Southampton
SO14 7SJ

Phone: 02380 003637

Email: sbcp@gosouthampton.co.uk

Types of data subjects processed

The Scheme processes the personal data of all its Members.

The personal data we collect

The personal data that we may collect about you is as follows:

- Name
- Place of employment
- Postal address
- Email address
- Email address
- Phone number

We will collect this data from you directly.

How we use your personal data

We will only process your Personal Data when the law allows us to do so. The Personal Data will be used to:

- To enable the efficient management of the Scheme and membership of the Scheme.
- To defend and indemnify the Scheme in case of any member's non-compliance with the Scheme's Rules & Protocols.
- To enable the Scheme to communicate efficiently to members by sending only relevant news, alerts and documents, and information about events which are relevant, to them.

Lawful basis for processing your personal data

We do not store, process, or share the data of Scheme members unless we have an appropriate lawful reason to do so.

Under Data Protection Legislation, the lawful bases we rely on for processing your information are:

- Contractual obligation - The Scheme's existing contract/agreement between itself and its members requires that members provide their name, postal and email addresses, telephone etc to the Scheme.

Recipients or categories of recipients of members' personal data

We may need to share your personal data as part of the operation of the Scheme. This may include but is not limited to:

- Members who are property owners, agents or their employees working within the operational area of the Scheme who share the same legitimate interests.
- government bodies and regulatory authorities, including the Police and other crime prevention and detection agencies and the UK Information Commissioner's Office.
- the courts and other dispute resolution arbitrators and mediators, other parties to legal proceedings.
- If we need to share Personal Data to establish, exercise or defend our legal rights – this includes providing Personal Data to others for the purposes of detecting and preventing fraud.
- Data Controllers of other organisations, like the Scheme, 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 Scheme's area of operation.

We use Service Providers ("Data Processors") who are third parties who provide elements of services for us. We have Data Processor Agreements in place with our data processors. This means that they cannot do anything with your Personal Data unless we have instructed

them to do it. They will not share your Personal Data with any organisation apart from us or further sub-processors who must comply with our Data Processor Agreement. They will hold your Personal Data securely and retain it for the period we instruct.

Where we share your data with another data controller, we have entered into an appropriate data sharing agreement with them that governs the sharing of your data.

Data retention period for members data

The Scheme will retain members' personal data only for as long as each member remains a member of the Scheme. When a member ceases to be a member of the Scheme, he/she must confirm this with the data controller as specified in the Scheme's Rules & Protocols at which time all associated personal data will be irrevocably deleted.

In the case of submitted reports, the submitting member's email address only will continue to be associated with such reports for as long as the report is retained by the Scheme; this is required where a report is used for evidential purposes in legal proceedings.

Data Processors

The Scheme employs the services of the following Data Processor(s):

- Littoralis Limited; access the Littoralis Standard Terms & Conditions including our Data Processor Contract with the company [here](#)

Privacy Notices distribution member

Privacy Notice - This document will be available for members to access on the front screen of SBCP Disc system on first login or at any time. It can also be requested from us using the contact details in this notice.

Your rights over your personal data

The right to be informed about our collection and use of personal data

You have the right to be informed about the collection and use of your personal data. We ensure we do this with our internal and external Privacy Notices (including this document). These are regularly reviewed and updated to ensure these are accurate and reflect our data processing activities.

Right to Access Your Personal Data

You have the right to access the Personal Data that we hold about you in many circumstances, by making a request. This is sometimes termed 'Data Subject Access Request.' If we agree that we are obliged to provide Personal Data to you (or someone else on your behalf), we will provide it to you or them free of charge and aim to do so within 1 month from when your identity has been confirmed.

We may ask for proof of identity and sufficient information about your interactions with us that we can locate your Personal Data.

If you would like to exercise this right, please **Contact Us** as set out below.

Right to Rectify Your Personal Data

If any of the Personal Data we hold about you is inaccurate, incomplete, or out of date, you may ask us to correct it.

If you would like to exercise this right, please **Contact Us** as set out below.

Right to Erasure

You have the right to have personal data erased. This is also known as the 'right to be forgotten'. The right is not absolute and only applies in certain circumstances. For instance, the right to erasure does not apply where we have a legal obligation to retain your Personal Data.

If you would like to exercise this right, please **Contact Us** as set out below.

Right to Restrict Processing

You have the right to ask us to restrict the processing of your personal data. For example, this may be because you have issues with the accuracy of the data we hold or the way we have processed your data. The right is not absolute and only applies in certain circumstances.

If you would like to exercise this right, please **Contact Us** as set out below.

Right to Object

You have the right to object to our processing of some or all the personal data that we hold about you. This is an absolute right if we use your data for direct marketing but may not apply in other circumstances where we have a compelling reason to do so, e.g., a legal obligation.

If you would like to exercise this right, please **Contact Us** as set out below.

Rights Related to Automated Decision-Making

You have the right to object to our processing where a decision is made about you solely based upon automated processes and which has significant or legal effects. However, this right does not apply as there is significant human involvement in decision making during the processing.

For more information about your privacy rights

In the UK, the Information Commissioner's Office (ICO) regulates data protection and privacy matters. They make a lot of information accessible to consumers on their website, which you can access here: <https://ico.org.uk/for-the-public>.

You can make a complaint to the ICO, or any other supervisory authority, at any time about the way we use your information. However, we hope that you would consider raising any issue or complaint you have with us first. We will always do our absolute best to solve any problems you may have.

Description of security methods (Technical and Organisational)

The Scheme processes all personal data within the DISC online 'secure environment' in which all personal data processed by the Scheme is secured. The DISC system aligns with the principles of 'Data Protection by Design and Default' as defined in the latest version of the DISC Information Security Management and Policy which can be accessed [here](#)

International Transfers

It is not expected that we will transfer your personal data internationally.

However, if this does happen and we are required to transfer your Personal Data out of the UK or EU to countries not deemed by the ICO or European Commission (as relevant) to provide an adequate level of Personal Data protection, the transfer will be based on safeguards that allow us to conduct the transfer in accordance with the Data Protection Legislation, such as the specific contracts containing standard data protection clauses approved by the ICO or European Commission (as relevant) providing adequate protection of Personal Data. You can obtain a copy of this documentation by contacting us at Contact Us section below.

Contact Us

If you would like to exercise one of your rights as set out above, or you have a question or a complaint about this Privacy Notice or the way your Personal Data is processed, please contact our Data Protection Officer by one of the following means:

By email: sbcp@gosouthampton.co.uk

By post: Southampton Business Improvement District Ltd
Network Eagle Lab
Portland Terrace
Southampton
SO14 7SJ

Changes to Our Privacy Notice

Thank you for taking the time to read our Privacy Notice.

We may change this Privacy Notice from time to time (for example, if the law changes). We recommend that you check this Privacy Notice regularly to keep up to date.

This Notice was last updated 17th June 2024