

WINCHESTER

BUSINESS CRIME REDUCTION PARTNERSHIP



Winchester Business Crime Reduction Partnership

managed by Winchester City Centre Partnership

PRIVACY NOTICE (OFFENDERS)

This document describes the Scheme, explains why it will process your personal data and the lawful basis for that processing.

It describes the types of processing we will carry out, and the kind of information about you we will process. It also explains how we obtain your personal data, who we will share it with and for how long we will keep it.

At the end of the document you will be able to read about your rights.

About Winchester Business Crime Reduction Partnership

We are a membership organisation made up of owners, their representatives, Police and Local Authority partnerships and accredited partner Business Crime Reduction Schemes. The purpose of the Scheme is to prevent, detect, or reduce the impact of, low-level crime and anti-social behaviour on local businesses within the Winchester Business Improvement District.

Contact details

Address Winchester Business Hub, 32 St Thomas Street, Winchester, SO239HJ

Email address: enquiries@winchesterbid.co.uk

Tel: 01962 841000

Because the Scheme will process personal data, including your own, it is registered with the Information Commissioners Office (Registration Number: **Z3287091**)

One of the Scheme's obligations under the law is to provide you with all the information you may wish to know about why and how it will process your personal data – and tell you about your rights. This is the purpose of this document.

Purpose of processing personal data

WINCHESTER BUSINESS CRIME REDUCTION PARTNERSHIP Privacy Notice (Offenders)

Version 08.04.25

WINCHESTER

BUSINESS CRIME REDUCTION PARTNERSHIP



The Scheme is a membership organisation which represents its Members who have the right to protect their premises, property, staff and customers from crime and anti-social behaviour, and to exclude from their premises any individuals who are threats to their premises, property, staff, or customers.

Where an individual has been reported by a Member of the Scheme for direct involvement in an incident that represents such a threat, the Scheme will process that individual's personal data for the specific purpose of enabling Members to exercise their rights.

The Scheme's Members will share the personal data of that individual among themselves so that they can identify the individual and may exclude the individual from all the properties of all scheme Members, across the Scheme's Area of Activity which is Winchester Business Improvement District.

You have been reported as involved directly in one or more incidents that represented a threat to one or more Members' premises, property, staff, or customers, and therefore your personal data will be processed by the Scheme on behalf of its Members.

Lawful basis of processing

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

The Scheme process Special Category Data under Schedule 1, Part 2 of Data Protection Act 2018 as the Scheme has a substantial public interest in preventing and detecting unlawful acts.

The Scheme also processes alleged or suspected criminal activity under Schedule 1 Part 3 of the Data Protection Act 2018, Paragraph 36 for Substantial Public Interest.

Types of processing

WINCHESTER

BUSINESS CRIME REDUCTION PARTNERSHIP



The Scheme 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.

Personal, Special Category and Criminal Activity data

The Scheme may collect the following types of personal data relating to identified and unidentified Offenders:

Names, Images (Police Custody Images & Members' CCTV Images), date of birth, descriptions, ethnicity, aliases, associates who commit retail crime (including partners), vehicles, arrests, suspected/attempted criminal or anti-social activity, convictions, warning markers.

Sources of personal data

Offenders' personal data may be provided to the Scheme 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.

WINCHESTER

BUSINESS CRIME REDUCTION PARTNERSHIP



- **Data Controllers of other organisations, similar to the Scheme**, in other areas where there is evidence that an Offender has participated, or is likely to participate, in any threat or damage to premises, property, staff and customers in those areas.

Recipients, or categories of recipients, of personal data

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

- **Members** who are property owners, agents or their employees working within the operational area of the Scheme 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 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.

The Scheme will not transfer Offenders' data outside the UK.

Age policy

The scheme may share Data of under 18s if they fall into the category of Targeted or Excluded Offenders. However, the Scheme's will not routinely share Data of any unknown person who are or appear to be under 18 unless there are reasonable grounds for doing so and those grounds are recorded within Disc. The Scheme will not display data of anyone who is or appears to be under the age of 13. However, the scheme may process that Data and pass it to appropriate authorities (Police/Council) for appropriate action. The Scheme may store Data of Under 13s in the Disc Database, but this data will only be accessible to the Scheme's Administrator and Sub-Administrators, subject to the Scheme's policy on Irrevocable Erasure of Personal Data (*see below*)

Data may also be shared by consent. e.g. In the case of a Missing Person under 18 years old and consent to share data has been authorised by a parent or guardian. This includes persons Under 13 years old.

WINCHESTER

BUSINESS CRIME REDUCTION PARTNERSHIP



Missing Persons

Details of Missing Persons, including images, that are officially reported to Police, may be shared with members. Notification will come from Police and will only be shared by consent on Police authority. Once that person has been located and is no longer classified as 'missing', their details will be removed from the Gallery as soon as possible, unless it is appropriate that they are still classed as 'Targeted' and there is justification to continue sharing, processing, or storing their data under Legitimate Interest.

Incident Retention Period

Winchester Business Crime Reduction Partnership will only retain Incident Data for 5 years from the date of submission. All incident data is then anonymised and only retained for analytical purposes.

Data retention period

Unidentified Offenders

Unidentified Offenders (CCTV Images) will be displayed to members for 6 months from the date of the incident unless they are identified sooner. In that case, they may be treated as Targeted or Excluded. If they do not fit either criteria they will cease to be displayed to members. Once the data has ceased to be displayed to members, it will be retained for 12 months on the Disc Database, only viewable by Administrators and Sub Administrators before it is irrevocably deleted.

Targeted Offenders

Targeted Offenders data will be displayed to members for 12 months from the date of the incident unless they are identified as being involved in further incident(s). In that case, they may have that 'view' date extended by up to a further 12 months or may be treated as Excluded. If they do not fit those criteria, they will cease to be displayed to members. Once the data has ceased to be displayed to members, it will be retained for 24 months on the Disc Database, only viewable by Administrators and Sub Administrators before it is irrevocably deleted.

Excluded Offenders

WINCHESTER

BUSINESS CRIME REDUCTION PARTNERSHIP



Excluded Offenders data will be displayed to members for 12 – 24 months (dependent on length of exclusion) from the date of the exclusion letter unless they are identified as being involved in further incident(s). In that case, they may have that 'view' date extended by up to a further 12 months. Once their Exclusion period has ended, they will revert to being 'Targeted' for 12 months and their data treated as above. Once they do not fit those criteria, they will cease to be displayed to members. Once the data has ceased to be displayed to members, it will be retained for 24 months on the Disc Database, only viewable by Administrators and Sub-Administrators before it is irrevocably deleted.

Your rights

You have the right to obtain a copy of all the personal data which the Scheme holds about you; to do so the Offender must contact the Data Controller (see contact details above); you may be required to provide proof of your identity. In any case the Scheme will respond to your request within 30 days.

If, when you access your personal data, any of it is found to be incorrect, unnecessary, or disproportionate, you can require the Scheme to correct it. You do not have the right to require the Scheme to delete any data which is correct, necessary or proportionate for the Scheme's purposes of processing.

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