

# Subject Privacy Notice

## Lincoln BIG Security Group

This document describes the Lincoln BIG Security Group (the Partnership), explains why the Partnership will process your Personal Data and the lawful basis for that processing. It describes the types of processing we 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 keep it.

**About Lincoln BIG Security Group:** The Lincoln BIG Security Group is a Partnership between Levy Paying Businesses, Police, Local Authorities, and other interested Agencies. The purpose of the Partnership is to prevent, detect & reduce the impact of crime and anti-social behaviour to Member businesses.

### Contact Details:

Lincoln BIG Security Group  
PO Box 961  
Lincoln  
LN5 5EZ

yvette.mills@lincolnbig.co.uk  
07584 688057

The Partnerships 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. (Registration Number Z7874505). One of the Partnerships 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:** Members of the Partnership have the right to protect their premises, property, staff and customers from crime and anti-social behaviour, and to exclude from their premises anyone who is a proven threat to their premises, property, staff, or customers.

Where a Subject has been reported by a Member of the Partnership for direct involvement in an incident that represents such a threat, the Partnership will process that Subjects Personal Data for the specific purpose of enabling Members to exercise their rights.

The Partnership Members will share the Personal Data of that Subject among themselves so that they can identify the Subject and may Exclude the Subject from all the properties of all the Partnership Members across the Partnership area which is the Lincoln BIG BID area and surrounding retail parks.

You have been reported to have been 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 Partnership on behalf of its Members.



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**Lawful Basis for Processing:** The Partnership Members' Legitimate Interests provides the lawful basis on which it may process specific items of a Subjects Personal Data for specific purposes without the Subjects consent.

The Partnership has assessed the impact of its processing on your rights and freedoms, has balanced these with its Members own rights, and has concluded that its Members' rights prevail over your rights in this specific matter. Therefore, for the specific purpose of enabling Members to exercise their rights, Members' legitimate interests constitute the Partnerships lawful basis for processing your Personal Data without requiring consent.

**Types of Processing:** The Partnership undertakes the following types of processing of the 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.

**Personal, Special Category & Criminal Activity Data:** The Partnership may collect the following types of Personal Data relating to identified and unidentified Subjects:

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

**Sources of Personal Data:** Subjects Personal Data may be provided to the Scheme by the following.

**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.

**Data Controllers of other Organisations Similar to the Partnership:** in other areas where there is evidence that a Subject 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 Partnerships 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.



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**Data Controllers of other organisations, like the Scheme:** 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 Partnerships 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 threat or damage to any Member's property, staff or customers, his/her name and facial image may be shared among Members for 6 months. 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 Scheme's database (which can only be accessed by the Data Controller) after which time it will be irrevocably deleted.

If during the 6 months when a Subjects Data is circulated among Members, he/she is reported for another incident involving a 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 6 months from the date of the second report.

If there is a further incident within [this](#) 6-month period the Subject will be excluded from all the properties of all Members for 12 months, and this fact will be shared with Members.

If no further report is submitted by a Member 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 Scheme's database (which can only be accessed by the Data Controller) after which it will be irrevocably deleted.

**Subjects Rights:** You have the right to obtain a copy of all the Personal Data which the Partnership holds about you; to do so you must contact the Data Controller (see contact details above); you will be required to provide proof of your identity. The Partnership will respond to the request within 30 days and provide full documentation to demonstrate compliance with Data Protection law.

If, when you access your Personal Data, any of it is found to be incorrect, unnecessary, or disproportionate, you can require the Partnership to correct it. You do not have the right to require the Partnership to delete, correct, necessary or proportionate information.

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



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