

G Safe (the Scheme)

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 G Safe

We are a membership organisation made up of local businesses, police and community safety agencies. The purpose of the Scheme is to prevent, detect, or reduce the impact of, low-level crime and anti-social behaviour on local businesses in the Borough of Gravesham in the County of Kent.

Contact details

G Safe Business Crime Reduction Partnership
Civic Centre, Windmill Street, Gravesend, Kent, DA12 1AU
01474 337154 or 07854 074 254
admin@g-safe.org.uk

Because the Scheme will process personal data, including your own, it is registered with the Information Commissioners Office (Registration Number Z7616747)

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

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 the Borough of Gravesham in the County of Kent.

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

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.
- **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.

Data retention period

- Offender's personal data is shared with Members for 12 months from the date of the last incident or the date of the expiry of exclusion, then it will be withdrawn from Member view;

- After which, the Offender's personal data will be retained by the Scheme in our Disc database for a further 12 months on administrator view only before it is irrevocably deleted, unless any further incidents are reported.

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/>

G Safe Business Crime Reduction Partnership

PRIVACY NOTICE (MEMBERS)

This document explains who the G Safe Business Crime Reduction Partnership (the Scheme) is, why it processes its Members' personal data, and the lawful basis for that processing. It describes the kind of personal data about Members that the Scheme is allowed to process, and what the Scheme can do with it.

Contact details

G Safe Business Crime Reduction Partnership
Civic Centre
Windmill Street
Gravesend
DA12 1AU
Email address: sophie.jordan@g-safe.org.uk
Tel: 07854 074254

The Scheme's 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 Scheme is registered with the Information Commissioners Office as a Business Crime Reduction Partnership.

Purpose of processing personal data

The Scheme processes Members' personal data for the following purposes:

- to enable the efficient management of the Scheme; to manage the membership of the Scheme including subscriptions where relevant; invitations to the Scheme's Annual General Meeting and other meetings where relevant etc;
- 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 of processing

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. This contract/agreement means that the Scheme's lawful basis for processing Members' personal data is 'contract' and therefore the Scheme can process Members' personal data without their further consent.

Categories and types of personal data processed

Name, name and place of employment, postal and email addresses, telephone and other contact details will be processed;

No sensitive or 'special category' personal data (ethnicity, sexuality, religious beliefs etc) is processed by the Scheme.

Sources of personal data

The Scheme obtains Members' personal data from existing contracts/agreements with Members;

Members may themselves update their personal data on the Scheme's online system (My Account).

Recipients of Members' personal data

The Scheme's Board of Management, Data Controller and formally contracted Data Processors may access Members' personal data;

Members' personal data will not be passed to any third party unless to the police under warrant or with the expressed permission of the Member;

The Scheme will not transfer Members' personal data outside the UK.

Data retention period

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 Scheme's Board of Management 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 may be used for evidential purposes in legal proceedings.

Members' rights

Members can obtain a copy of all their personal data held by the Scheme; Members may access this at any time on the Scheme's online system (My Account) or may be obtained on application to the Data Controller (see **Contact Details** above).

Members can correct any erroneous data at any time on the Scheme's online system (My Account) or may require the Scheme to correct any errors on their behalf.

At the conclusion of their Membership, Members' personal data will be irrevocably deleted by the Scheme with the exception of email addresses associated with Incident reports (see **Data Retention Period** above) and may require the data Controller to confirm such deletion. Members have the right to complain about the Scheme to the Information Commissioners at <https://ico.org.uk/concerns/handling/>