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**Privacy policy**

MyMiltonKeynes Business Improvement District (BID) is a private limited company incorporated and registered in England and Wales under company number 04260537 whose registered office is at Suite 301 Midsummer Place, 417 Saxon Gate East, Central Milton Keynes, MK9 3GB. Alternatively, you can telephone 01908 395 099. MyMiltonKeynes BID is registered with the Information Commissioner’s Office as a data controller (No. 04260537).

This notice describes the type of personal data we collect and how we may use and share that data. The term “personal data” means information about an identifiable individual which includes name, address, email, telephone number and other information relating specifically to an individual.

MyMiltonKeynes BID is a not-for-profit company which has been established by our business community to project manage improvements and services in Milton Keynes City Centre.

**What data we collect and how we use it**

**MyMiltonKeynes BID businesses**

The information we collect, and hold includes your organisation’s name, telephone number, and the local address of the property that is liable to pay the BID levy or a voluntary membership fee. This information has been either obtained from data held by the Milton Keynes City Council’s NNDR team, or directly collected by the BID itself.

The personal information we gather only extends to the business representative’s mobile telephone number, job title, company and/or personal email address as may be supplied directly by the business representative.

In order to provide the services you have requested and the services laid out in the MyMiltonKeynes BID Business Plan we will use your data to:

* Identify you as a Levy Payer if you contact us in relation to MyMiltonKeynes BID.
* Keep track of important direct communications that we have with you by storing emails via an appropriately sourced CRM system.
* Send you email and postal communications to keep you up-to-date with progress, activities and services.
* To record your interest in, or attendance at an event. Given the nature of BIDs, it’s important for us to demonstrate consultation and engagement with our business community.
* For statistical analysis.

If you choose not to provide us with your personal data you may not be able to access some of the services we offer, such as our e-updates, offers, promotions or receive invitations to events and workshops.

Our lawful bases for our storing and processing of different sorts of personal data are:

* The data subject has given consent to the processing of his or her personal data for one or more specific purposes.
* Processing is necessary for compliance with a legal obligation to which the controller is subject.
* Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party.

**Use of images**
MyMiltonKeynes BID routinely uses photos and videos to promote our work and events via our social media accounts, our Website and other communications. At times, we may share your image for use by our partners to promote or advertise our events, projects, services and initiatives. Where possible, we will try to gain your consent in advance. However, if we are using an image of you, and you would like us to stop, please contact us. Please note, we do not pay or provide credit for use of your image in our photographs or videos.

**MyMiltonKeynes BID Newsletter Subscribers**

MyMiltonKeynes BID sends a monthly CEO update email to keep businesses updated on the latest news, updates, training invitations, event news, and much more. You may choose to subscribe to our newsletter from our website. In order to send you the newsletter we will collect your name, business name, address and email address. We may gather statistics around email opening and clicks using industry standard technologies.

Our lawful basis for holding this personal information is that you provide your Consent through opting in. You may withdraw your consent at any time by clicking the “unsubscribe” link contained in each newsletter or by contacting us directly.

**MyMiltonKeynes BID Customers**

When you purchase a product or service from us we will collect the personal information required to perform the service. This information includes your name, billing and business addresses, email address, phone number and payment method. Our lawful basis for collecting this information is that we have a Legitimate Interest to enable us to provide products and services to you.

**MyMiltonKeynes BID Employees**

* **Recruitment**

The information you provide during the recruitment process will only be used for the purpose of progressing your application and we will not share any of the information you provide during the recruitment process with any third parties.  The information you provide will be held securely by us and/or our data processors whether the information is in electronic or physical format.

We will use the contact details you provide to us to contact you to progress your application. We will also ask you about your previous experience, education, referees and for answers to questions relevant to the role you have applied for.  We will use the information you provide to assess your suitability for the role you have applied for.

* **Employment**

If we make a conditional offer of employment we will ask you for information so that we can carry out pre-employment checks. We need to confirm the identity of our staff, their right to work in the United Kingdom and seek assurance as to their trustworthiness, integrity and reliability. You will therefore be required to provide proof of your identity and proof of your qualifications. We will contact your referees, using the details you provide in your application, directly to obtain references.

If we make a final offer, we will also ask you for the following:

* Bank details – to process salary payments;
* National Insurance number and tax codes for use with HMRC; and
* Emergency contact details – so we know who to contact in case you have an emergency at work.

During your employment with us we will collect and store information in your personnel file such as performance reviews and leave records.

**Our website**

* **Cookies**

Cookies are small pieces of information sent to your computer or browsing device when you access a website. These files are not computer programmes and cannot be used to cause damage to your computer. They are often essential to help provide you with a good online experience. By accessing the Website, you agree that cookies can be placed on your device. You can disable cookies by changing your browser settings. However, some areas of the Website may not function correctly without the use of cookies.

Like most websites, we use third party companies, such as Google, to provide analytics software to monitor web visits. In this situation, cookies are used to provide us with information about how people use our site. This information is completely anonymous and is only used to improve the Website. Please consult Google’s information for privacy information relating to these cookies.

* **Links to Other Website**

Our website may contain links to other website that are outside our control and are not covered by this Privacy Policy. If you access other sites using the links provided, the operators of these sites may collect information from you that will be used by them in accordance with their privacy policy, which may differ from ours.

* **Making Contact via our website**

You may choose to raise a query with us via the contact forms provided on our website or by emailing info@MyMiltonKeynes.co.uk. In this case we will collect and store your name and email address. As an alternative method of contact you may click on one of the email addresses on our website. In this case the link will open your own email application and you will not need to save your information on our website.

**Personal Data Retention Periods**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Data relating to:

* clients, customers and suppliers will be maintained for such periods as are laid down by the professional bodies responsible for the conduct of the Company and/or statutory and regulatory requirements.
* BID Levy payers will be maintained for 7 years after the delivery of the BID is completed.
* project delivery will be retained for 7 years after the end of the BID Development or 7 years after BID Delivery is completed.
* the recruitment of staff:
	+ If you are unsuccessful following assessment for the position you have applied for, your details be retained for up to a period of six months.
	+ If you become a member of staff the information you provide during the application process will be retained by us as part of your employee file for the duration of your employment plus 7 years following the end of your employment.

Where data has been collected from individuals who have undertaken the following activities with the BID, the retention period for this data will be for the duration of the BID life only:

* Subscribers to our social media
* Subscribers to our MyMiltonKeynes BID or MyMyMiltonKeynes newsletters
* Exhibitors and sponsors of our events (although financial records are kept for 7 years)
* Entrants to our surveys

**Disclosure of information to outside parties**

We do not circulate, exchange or sell personally identifiable data to outside parties without your express consent. We use a number of service providers to assist us deliver products and services to you and share necessary portions of your personal information with them:

* Our website hosting provider is Wix
* Our CRM database is Hubspot holds the personal information you provide that enables us to send you the newsletter.
* Contract documents, records and invoices of our suppliers are held on our server;
* Our accounting system, Xero, holds your personal information related to invoices and payments.

All of our service providers are required to maintain the confidentiality and security of your personal information and to use it only in compliance with applicable privacy laws. These companies are not authorised to use your information in any manner, other than in helping us to provide you with products and services or as otherwise required by applicable law.

We may release your information if we believe release is appropriate to comply with the law, enforce policies or protect our rights, property and safety. We may disclose data as required by order of court, jurisdiction or any judicial, governmental or regulatory body.

**Employees**

We share our employees’ personal information with our accountant for preparing payroll, with HMRC and with our pensions provider. We may also disclose specific personal information about you if required by law, governmental request or court order if, based on our good faith belief, it is necessary to conform or comply with such law, request or court order.

We maintain reasonable administrative, technical and physical safeguards in an effort to protect against the loss, theft, unauthorised access, use, modification and disclosure of personal information in our custody and control. We only provide access to personal information to employees and authorised service providers who require such information for the purposes described in this Privacy & Security Policy.

**How We Protect Your Personal Data**

We maintain administrative, technical and physical safeguards to protect against loss, misuse or unauthorised access, disclosure, alteration or destruction of the personal data you provide to MyMiltonKeynes BID.

**Your rights**

If you have any questions or comments about this Notice, would like to update your contact details and preferences, find out what data we hold about you or to tell us you no longer want us to process your personal data, you can email us at **info@MyMiltonKeynes.co.uk**

If you ask that we stop using your personal data, we will take reasonable steps and honour that request. However, we will retain records of your personal data as needed to comply with applicable law and for the purposes of voting in a BID renewal ballot.

**How to make a complaint**

If you are unhappy with the way that we have processed your data, or with aspects of our data protection policy, we would encourage you to contact us in the first instance. If you are dissatisfied with the way that we have handled your complaint (or if you would prefer to exercise your right to do so), you may contact the Information Commissioner directly. Information on how to do this can be found on their [**website**](https://ico.org.uk/concerns/handling/).

**Updates to Our Privacy Notice**

Any changes we may make to our privacy policy in the future will be posted on this page. You should check this page from time to time to ensure that you are happy with any changes.

Last updated: May 2024