

## Privacy Policy

This new Privacy Policy came into effect on **25th May 2018**.

LeedsBID ("**we**", "**us**", "**our**") are committed to protecting and respecting your privacy.

This privacy policy ("**Privacy Policy**") sets out the basis on which any personally identifiable information ("**Personal Data**") we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your Personal Data and how we will treat it in respect of your use of our websites and services ("**the Service**").

By using the Service, you are accepting the terms of this Privacy Policy.

### Information we may collect from you

We may collect and process the following information about you:

**Information you give us:** If you decide to register with or use a Service you will be asked to provide certain information about yourself. You will voluntarily provide us with Personal Data which includes your name, email address and contact details when you:

- Register to use a Service.
- Sign up to use the Services via an integrated service, such as Google.
- Request and receive customer support.
- Register for offers or events.

**Information we collect about you:** Each time you use the Service we may automatically collect the following information:

- Technical information that your browser sends whenever you visit a website or your mobile app sends when you are using it. This log data may include your Internet Protocol (IP) address, the address of the web page you visited before using the Service, your browser type and settings, the date and time of your use of the Service, information about your browser configuration and plug-ins, language preferences and cookie data.
- Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
- We may also collect publicly accessible data about you from social media websites that you visit when using the Service.
- We may also collect non-personally identifiable information (e.g. gender and location) to assist in providing the Service to you. Non-personally identifiable information by itself cannot be used to identify or contact you. However, this information may be combined with other identifiers in a way that enables you to be identified.

By submitting your Personal Data and non-personally identifiable information, you consent to the collection, use and transfer of your information in accordance with the terms of this Privacy Policy.

**Information we receive from other sources:** We may receive information about you if you use any of the other websites we operate or the other services we provide. In this case we will have informed you when we collected that data that it may be shared internally and combined with data collected via the Service. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

## Use of cookies

We use cookies on our website to distinguish you from other users of our website and Service. This helps us to provide you with a good experience when you browse our website and allows us to improve the website and services we offer. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy.

## If you are under 16 years of age

If you're under the age of 16, you may not have an account on the Service. We do not knowingly collect information from or direct any of our content specifically to children under 16. If we learn or have reason to suspect that you are a user who is under the age of 16, we will unfortunately have to close your account.

## Uses made of Information

We will only use information held about you in the following ways

### Information you give to us:

- To understand and improve our Services to you.
- To ensure that content from our Service is presented in the most effective manner for you and for your computer.
- To communicate with you by responding to your requests and sending you emails and messages.
- To administer your account.
- To keep the Service secure by investigating and preventing abuse and fraud.
- To carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us.
- To provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about.
- To notify you about changes to our Service.

### Information we collect about you:

- To administer our Service and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- To improve our Service to ensure that content is presented in the most effective manner for you and for your computer.
- To allow you to participate in interactive features of our Service, when you choose to do so.
- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you.
- To make suggestions and recommendations to you and other users of our Service about services that may interest you or them.

By using the Service, you agree that we can access, aggregate and use non-personally identifiable data we have collected from you. This data will in no way identify you or any other individual. We may use this aggregated non-personally identifiable data to:

- Assist us to better understand how our customers are using the Service.
- Provide our customers with further information regarding the uses and benefits of the Service.
- Provide useful business insights from the aggregated data.

**Information we receive from other sources:** We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive). By

using the Service, you consent to Personal Data being collected, held and used in this way and for any other use you authorize.

## Disclosure of your information

We may share your Personal Data with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

**Information we share with third parties:** We may share your information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you and for the purposes of providing part of the Service to you. Such third parties supply the hardware infrastructure, storage and associated services necessary for us to provide the Service. All information submitted to third parties will be encrypted using SSL technology. By using our websites and/or the Service you consent to our third-party service partners having access to your Personal Data.
- Analytics and search engine providers that assist us in the improvement and optimization of our Service.

**Personal Data we disclose to third parties:** We follow strict guidelines in the storage and disclosure of information which you have given us, to prevent unauthorized access. We comply with the laws of the countries from which we operate. We may disclose your Personal Data to third parties:

- If LeedsBID or substantially all its assets are acquired by a third party, in which case Personal Data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your Personal Data to comply with any legal obligation, or to enforce and/or any other agreements; or to protect the rights, property, or safety of LeedsBID, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.
- In complying with court orders and similar legal processes, we strive for transparency. When permitted, we will make a reasonable effort to notify users of any disclosure of their information, unless we are prohibited by law or court order from doing so, or in rare, exigent circumstances.

## Your rights

Six lawful basis for processing Personal Data are defined under the General Data Protection Regulation (EU) 2016/679. Four apply to these Services and they are described below:

**Consent:** the individual has given clear consent for us to process their Personal Data for a specific purpose.

**Contract:** the processing is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract.

**Legal obligation:** the processing is necessary for us to comply with the law (not including contractual obligations). For example, in order to canvas individual voters in the event of a ballot required under the terms of the Business Improvement District Regulations.

**Legitimate interests:** the processing is necessary for our legitimate interests or the legitimate interests of a third party, for example, to fulfil our obligations to a member of a Business Improvement District, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

Unless we have a legal obligation to process your Personal Data, the following rights will apply to you:

**The right to be informed:** this Privacy Policy has been written to keep you informed about the collection and use of your Personal Data. Please read it carefully and review it often.

**The right to access and portability:** you can request a copy of your Personal Data by sending a written request to LeedsBID [enquiry@leedsbid.co.uk](mailto:enquiry@leedsbid.co.uk). We will provide this to you in a common and machine-readable format.

**The right to rectification:** you can request that we correct any inaccuracies in the Personal Data we store by sending a written request to [enquiry@leedsbid.co.uk](mailto:enquiry@leedsbid.co.uk)

**The right to erasure:** you have the right to have your Personal Data erased if we store such data on the basis of a consent that is withdrawn, or we no longer have a lawful basis for holding the data. You can request that your Personal Data is erased by sending a written request to [enquiry@leedsbid.co.uk](mailto:enquiry@leedsbid.co.uk)

**The right to object:** you have the right to object to the processing of your Personal Data. This effectively allows you to ask us to stop processing your personal data. You can send a written objection to [enquiry@leedsbid.co.uk](mailto:enquiry@leedsbid.co.uk). We will consider your objection in relation to any lawful basis for processing your Personal Data. If necessary, we will erase your data and inform you of such action.

## Retention

We retain your Personal Data for the following durations:

- **If the lawful basis is consent:** we will retain your data until your consent is withdrawn.
- **If the lawful basis is contract:** we will retain your data for the duration of the contract.
- **If the lawful basis is legitimate interest:** we will retain your data for as long as we continue to have a legitimate interest in processing your data.
- **If we have a legal obligation:** we will retain your data for as long as we have a legal obligation to do so.

We may keep some aggregate and non-personally identifiable data we have collected from you.

## Complaints

If you have any complaints about our use of your information please contact us as set out at the end of this Privacy Policy or contact the UK supervisory authority – The Information Commissioner's Office ("ICO").

## Applicable Data Protection Law

For the purpose of the General Data Protection Regulation (EU) 2016/679, the data controller is LEEDSBID LIMITED, a PRIVATE LIMITED COMPANY registered in Leeds, United Kingdom with number 9063015 whose registered office is at 104 Briggate, LS1 6BG Leeds.

## Where we store your Personal Data for EU Customers only

We will not transfer, or store, any of the Personal Data that we collect from you at a destination outside of the European Economic Area ("EEA").

Our Service is accessible via the Internet and may potentially be accessed by any user around the world. Other users may access the Service from outside the EEA. This means that where you chose to upload your data to the Service, it could be accessed from anywhere around the world and therefore a transfer of your data outside of the EEA may be deemed to have occurred. You consent to such transfer of your data for and by way of this purpose.

We always ensure that your information is only transferred in full accordance with UK data protection laws and/or applicable EU data protection law.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Service, you are responsible for keeping this password confidential. We ask you not to share any password with anyone.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your Personal Data, we cannot guarantee the security of your data transmitted to our Service; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

The Service may contain links to and from third party websites of our partners, networks, advertisers and affiliate. If you follow a link to any of these websites, please note that these websites have their own privacy policies and we do not accept any responsibility or liability for the privacy practices or content of these websites. You are responsible for checking the privacy policy of any third-party websites we link to.

## **Changes To This Privacy Policy**

We reserve the right to change this Privacy Policy at any time and any amended Privacy Policy will be posted on our websites and notified to you by email, where appropriate. Please check back frequently to see any updates or changes to our Privacy Policy. This Privacy Policy was last updated on 25 May 2018 and replaces any other Privacy Policy previously applicable from this date.

## **Contact Us**

Questions, comments and requests regarding this Privacy Policy are welcomed and should be forwarded by email to: [enquiry@leedsbid.co.uk](mailto:enquiry@leedsbid.co.uk)