

## Privacy Policy (Last Updated: 23 May 2018)

Newcastle NE1 Limited of Milburn House, Dean Street, Newcastle Upon Tyne, NE1 1LE with registration number 06500486 (**we, our or us**) is committed to protecting and respecting your privacy.

This policy sets out the basis on which any 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. Some of our websites and services may also have separate terms and conditions or cookies policies which also contain information about how we use your personal data.

Newcastle NE1 is a Business Improvement District company, which means our purpose is to provide support and services to local businesses, and manage projects and campaigns to benefit Newcastle. You can find out about how we operate in [About NE1](#).

In order to provide these services to Newcastle, it's visitors and residents, and to manage this website, we on occasion process personal data about our customers, stakeholders, partners, website visitors, members of the Newcastle community and any other individuals who show interest or are involved in our projects or campaigns. When we process this data, we are the data controller and are responsible for what we do with that data and how it is processed.

Please use the links below to read about how we process your personal data.

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## 1. **Changes to our privacy policy**

Any changes we may make to our privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy policy.

## 2. **Information we may collect from you**

Personal data, or personal information, means any information about an individual from which that person can be identified.

In some circumstances we may anonymise your personal data so that it can no longer be associated with you for research or statistical purposes.

We may collect, use, store and transfer different kinds of personal data about you, depending on the ways in which you engage with us, which are listed in [Purposes for which we use your personal data](#).

- **Identity Data** includes first name, last name or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not

considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### **If you don't give us your personal data**

Where we need to collect personal data to provide the offer or service you are interested in, we may not be able to provide that offer or service if you don't provide that data when requested. For example, we can't send your tickets or vouchers for events if you don't provide a valid email address. If we don't have sufficient information to process any request you make our website will prompt you to complete the missing information, or we will notify you at the time.

### **3. How is your personal data collected?**

We use different methods to collect data from and about you.

You may give us your personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you, for example:

- sign up for offers or services;
  - subscribe to our newsletters or publications;
  - request information or marketing from NE1 or one of our campaigns;
  - enter a competition, promotion or survey; or
- give us some feedback.

As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies. Please see our section on [Cookies](#) for further details.

We may also receive technical data from analytics providers such as Google, or other search engines and social media platforms when they are reporting on the interaction of our advertising or publicity campaigns and engagement.

If you are a business partner, or an employee or representative of one of our levy-paying businesses, we may receive personal data about you from various third parties and public sources, including, but not limited to, Newcastle City Council, Companies House, LinkedIn, Google and our Street Ranger team.

#### 4. Purposes for which we will use your personal data

We have set out below a description of the ways in which we may use your personal data, and what our legal basis under the General Data Protection regulation (GDPR) for that processing is. We have also identified what our legitimate interests are where appropriate and retention periods. Please note, however, that we may be obligated to retain your personal data for legislative compliance purposes which will override these retention periods.

A **Legitimate Interest** is an interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by emailing [advice@newcastlene1ltd.com](mailto:advice@newcastlene1ltd.com) or call us on 0191 211 3951.

Purpose/Activity	Lawful basis for processing	Retention period
To add you to our Get into Newcastle database, and keep you updated with goings on across the city, such as [Newcastle Restaurant Week, Screen on the Green, Newcastle Motor Show, for example].	We will add you to our database if you sign up for our newsletters or marketing communications; if you ask to be added; or if we meet you at a business or networking event and you give us your contact details. We will then be contacting you on the basis of your consent.	For as long as we continue to operate our Get into Newcastle website and associated events. If you ask us to remove your details we will do so within 1 month.
To share your information with provider of your chosen Newcastle Restaurant Week offer.	We will process this based on your consent to share your personal data with the offer provider.	For as long as we continue to operate Newcastle Restaurant Week.
To add you to our business events database [for example, our Business Breakfast networking events].	We will add you to our database if we meet you at a business or networking event and you give us your contact details, or if you contact us to express your interest in attending one of our events through word of mouth. We will then be contacting you on the basis of	For as long as we continue to operate business events. If you ask us to remove your details we will do so within 1 month.

	your consent.	
To send you correspondence relating to your Newcastle City Marina booking, if you are a current or former marina user.	This is on the performance of our contract with you as we are administrators of the Marina.	For as long as we continue to operate the Newcastle City Marina. We will retain data for 7 years from the point of last visit.
To send you information about events and offers you may be interested in relating to the Newcastle City Marina.	We will send this information to you if you sign up for these communications and will be contacting you on the basis of your consent.	For as long as we continue to operate the Newcastle City Marina. If you ask us to remove your details we will do so within 1 month.
To co-ordinate events, including interviews, workshops and placements if you have signed up to our NE1 Can programme.	We will process this information on the basis of our contract with you to provide you access to NE1 Can events.	For 5 years after the programme ceases to exist. If you request to be removed from the contact list we will remove your details within 1 month.
To contact both levy-paying and non-levy paying local businesses with service message updates, such as details of road closures or other potentially disruptive events happening across the city; or about upcoming events and campaigns.	We have a legitimate interest to keep local Newcastle businesses up to date with what is happening across the city, as part of our role as a Business Improvement District.	For as long as we continue to operate as a Company. If you request to be removed from the contact list we will remove your details within 1 month.
To contact the Business Improvement District levy-paying businesses about our BID function.	We have a legal obligation to manage NE1 as a Business Improvement District with Newcastle City Council under the Local Government Act 2003.	For as long as we continue to operate as a Company.

<p>To enter you into the Geordie Jackpot.</p>	<p>The legal basis for the collection and processing of your personal data is that you have given your consent and/or that it is our legitimate interest to do so as we could not operate the Lottery (Geordie Jackpot) without it.</p>	<p>We will only keep your information for as long as is necessary to enable your participation in the Lottery. As standard we keep data for 3 years from the user's last point of activity on the website / As Direct Debit users come with a lifetime guarantee we as standard hold this user data for 7 years.</p>
<p>To manage payments in relation to any of our services.</p>	<p>We need to do this in performance of our contract with you.</p>	<p>6 years from the point of payment/entering into contract.</p>
<p>Asking you to leave a review or take a survey in relation to any of our campaigns.</p>	<p>We do this for the legitimate interest of improving the service we provide to businesses and the community.</p> <p>When completing a survey we will process your information on the basis of your consent.</p>	<p>For as long as we continue to operate as a Company. If you request to be removed from the contact list we will remove your details within 1 month.</p>
<p>To enable you to partake in offers, prize draws, competitions.</p>	<p>We will contact you if we have your consent, or we have a legitimate interest to contact you in relation to any of our campaigns.</p> <p>We will manage any competitions you enter in performance of a contractual relationship.</p>	<p>For as long as we continue to operate our Get into Newcastle website and associated events. If you ask us to remove your details we will do</p>

		so within 1 month.
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data); to deliver relevant website content and understand the effectiveness of our publicity and advertising communications.	We may need to use some technical data which is capable of identifying you. We do this on the legitimate interest of developing NE1, our processes and strategy to create campaigns and events that are of maximum benefit to the community.	For as long as we continue to operate as a Company. If you request to be removed from the contact list we will remove your details within 1 month.
We may monitor and record communications with you (such as telephone conversations and emails).	This is for our legitimate interests of quality assurance, training, fraud prevention and compliance.	For as long as we continue to operate as a Company.

**Images** We have a legitimate business interest to use photos of our events in marketing documents, communications, in annual reports and on our website or publicity documents. If you attend an event where we may be taking photos, you will see signs notifying you of this and if you do not wish to be photographed we ask you not to enter this area or speak to one of our team on the day who can advise you when/where photography may take place. Where it is practicable, we may also ask for your express consent for photography. If we use an image which you believe identifies you, and you would like us to take it down and stop using it please contact [advice@newcastlene1ltd.com](mailto:advice@newcastlene1ltd.com). We keep images on file indefinitely as a historic record of our activities and Newcastle.

## 5. Disclosure of your personal data

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, which includes payment providers such as PayPal; our NE1 Street Rangers; Gatherwell who administer the Geordie Jackpot; our Restaurant Week Restaurants if you have downloaded a voucher; the placement providers, skill evaluators or workshop providers on our NE1 Can programme;

newsletter service providers such as MailChimp, and Monitor Mail, and Solomon (our customer relationship management system).

- analytics and search engine providers that assist us in the improvement and optimisation of our Site; and
- credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

We may disclose your personal information to third parties:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- if all, or substantially all, of our assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets; and
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation; or to protect the rights, property, or safety of our customers, or others.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We do not transfer personal data outside the European Economic Area (**EEA**).

## 6. **Cookies**

Some websites we operate have separate cookies policies which apply instead of this clause. If you are on one of our websites that doesn't have a separate policy please read this section.

We and our contracted third parties may gather information relating to usage of this website. Any information gathered is primarily for internal use to allow us to refine and improve our customer service.

This site uses Google Analytics and other third party services to monitor usage of this site and the effectiveness of advertising. These may use both persistent and session cookies to identify repeat visits and record usage.

Cookies are pieces of data created when you visit a site, and contain a unique, anonymous number. They are stored in the cookie directory of your hard drive, and do not expire at the



end of your session. Cookies used by the NE1 website contain no personal information about the user, nor does our website elicit or store any information from users other than the Internet Protocol address of the computer used to access the site.

Users may safely turn off cookies on this site without affecting how pages are displayed. We use cookies to better the user's experience while visiting the website. Where applicable this website uses a cookie control system allowing the user on their first visit to the website to allow or disallow the use of cookies on their computer and/or device.

### **Third-party cookies**

We work with third-party suppliers who may also set cookies on our Site, for example Twitter, Facebook and LinkedIn. These third-party suppliers are responsible for the cookies they set on our Site. If you want further information please go to the website for the relevant third party.

## **7. Security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. However, the transmission of information via the internet is not completely secure. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **8. Third Party Links**

Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## **9. Your rights**

You have the right to:

**Request access** to your personal data, known as a "data subject access request".

**Request correction** of any inaccurate personal data that we hold about you.

**Request erasure** of your personal data where there is no good reason for us continuing to process it. We may not always be able to comply with your request of erasure for legal reasons.

**Object to processing** of your personal data where we are relying on a legitimate interest. In some cases, we may demonstrate that we have compelling grounds to continue processing your information which override your request.

You also have the right to object where we are processing your personal data for direct marketing purposes.

**Request restriction of processing** of your personal data while we establish the data's accuracy; if our use is unlawful; to hold it on file in order to establish, exercise or defend legal claims; while we process your request to object to processing based on a legitimate interest.

**Request the transfer** of your automated personal data in a structured machine-readable format where we used the information to perform a contract with you, or you gave us your consent to process it.

**Withdraw consent at any time** where we are relying on consent to process your personal data.

**Complain** you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)).

## 10. **Contact**

Questions, comments and requests regarding this privacy policy are welcomed. Please contact us at [advice@newcastlene1ltd.com](mailto:advice@newcastlene1ltd.com) or call us on 0191 211 3951.