

## Data Protection (GDPR) Policy: Wrexham BID Ltd

Last Updated: February 24, 2026

### 1. Purpose and Scope

This policy sets out how Wrexham BID Ltd ("the Company") handles the personal data of its levy payers, employees, suppliers, and stakeholders. As a BID operating in Wrexham, North Wales, we are committed to compliance with the UK GDPR and the Data Protection Act 2018.

### 2. The Data Protection Principles

We will ensure that personal data is:

1. Lawful, Fair, and Transparent: Processed only where we have a legal basis (e.g., the BID Regulations 2005).
2. Purpose Limitation: Collected for specified BID projects and not used for unrelated commercial gain.
3. Data Minimization: We only collect the data we actually need (e.g., we don't need a business owner's home address if the business address suffices).
4. Accuracy: We will take steps to ensure data provided by WCBC is kept up to date.
5. Storage Limitation: Data is kept no longer than necessary (typically the 5-year BID term plus statutory audit periods).
6. Integrity and Confidentiality: Protected by "appropriate technical and organisational measures."

### 3. Data Collection: The "Levy Payer" Context

Wrexham BID Ltd processes data under the legal basis of "Public Task" and "Legal Obligation."

- Source: Data is provided by the Billing Authority (WCBC) via the *Operating Agreement*.
- Content: This includes Rateable Values (RV), business names, and billing addresses.
- Restriction: This data must not be used for non-BID purposes or sold to third-party marketing firms.

### 4. Data Sharing & Security

#### 4.1 Third-Party Processors

We may share data with third parties (e.g., a mailing house for the Annual Report or a BID Ranger contractor).

- Requirement: A written Data Processing Agreement (DPA) must be in place with every contractor.
- Location: Data should ideally remain within the UK.

#### 4.2 Security Measures

- Physical: Files at 10 Grosvenor Road must be kept in locked cabinets.
- Digital: Laptops used by the BID Manager/Staff must be encrypted and password-protected.
- Access: Only authorized personnel shall have access to the "Levy Payer Database."

#### 5. Data Subject Rights

Individuals have the right to:

- Request a copy of their data (Subject Access Request).
- Rectify inaccurate information.
- Withdraw consent (where processing is based on consent, such as newsletter sign-ups).

Note: Because levy collection is a statutory requirement, businesses cannot "Opt-Out" of the BID Levy or the processing of data required to collect it.

#### 6. Data Breach Notification

In the event of a personal data breach (e.g., a lost laptop containing the levy list or a CC'd email error), the Data Protection Officer (DPO) must:

1. Record the breach internally.
2. Assess the risk to individuals.
3. Report to the Information Commissioner's Office (ICO) within 72 hours if the breach is likely to result in a risk to rights and freedoms.

#### 7. Responsibility & Review

The Board of Directors of Wrexham BID Ltd is ultimately responsible for compliance. This policy will be reviewed annually to ensure it reflects Wrexham's evolving digital infrastructure.