

Data Protection (GDPR) Policy

Wrexham BID Ltd | Company No. 16536873

Last Updated: February 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 Business Improvement District operating in Wrexham, North Wales, we are committed to full compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

2. The Data Protection Principles

Wrexham BID Ltd will ensure that all personal data is processed in accordance with the following principles:

- **Lawful, Fair, and Transparent** — Processed only where a lawful basis exists (e.g., the BID Regulations 2005 or consent).
- **Purpose Limitation** — Collected for specified, legitimate BID purposes and not used for unrelated commercial gain.
- **Data Minimisation** — Only the minimum data necessary is collected (e.g., business address rather than a proprietor's home address where sufficient).
- **Accuracy** — Reasonable steps will be taken to ensure data provided by WCBC is current and accurate.
- **Storage Limitation** — Data is retained no longer than necessary, typically aligned to the 5-year BID term plus any statutory audit periods.
- **Integrity and Confidentiality** — Protected by appropriate technical and organisational security measures.

3. Data Collection: The Levy Payer Context

Wrexham BID Ltd processes levy payer data under the legal basis of **Public Task** and **Legal Obligation** pursuant to the Business Improvement Districts (Wales) Regulations 2005.

- **Source:** Data is provided by the Billing Authority (Wrexham County Borough Council) via the Operating Agreement.
- **Content:** Includes Rateable Values (RV), business names, NNDR account numbers, hereditament addresses, and billing addresses.
- **Restriction:** This data must not be used for non-BID purposes or disclosed to third-party marketing or commercial entities.

4. Data Sharing and Security

4.1 Third-Party Processors

Where Wrexham BID Ltd shares personal data with third-party contractors (e.g., a mailing house for the Annual Report, a BID Ranger contractor, or event organisers), the following safeguards must be in place:

- A written Data Processing Agreement (DPA) must be executed with every contractor before data is shared.
- Data should remain within the United Kingdom wherever possible.
- International transfers (e.g., via cloud-based tools) must be protected by appropriate safeguards such as Standard Contractual Clauses.

4.2 Security Measures

- Physical: All paper files held at 10 Grosvenor Road must be stored in locked cabinets.
- Digital: Laptops and devices used by BID staff must be encrypted and password-protected.
- Access Control: Only the BID Manager and authorised Board members may access the Levy Payer Database.
- Email: Sensitive data must not be sent via unencrypted email. A secure transfer method (SFTP or encrypted file) must be used.

5. Data Subject Rights

Individuals whose data is held by Wrexham BID Ltd have the following rights under UK GDPR:

- Right of Access — to request a copy of personal data held (Subject Access Request).
- Right to Rectification — to request correction of inaccurate or incomplete data.
- Right to Erasure — where processing is based on consent (e.g., newsletter subscriptions).
- Right to Withdraw Consent — at any time where consent is the lawful basis.
- Right to Object — to direct marketing at any time.

Note: Because BID levy collection is a statutory requirement under the Business Improvement Districts (Wales) Regulations 2005, businesses cannot opt out of the processing of data required for levy billing purposes, and the Right to Erasure does not apply to that data.

6. Data Breach Notification

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

- Record the breach in the internal Data Breach Log immediately.
- Assess the risk to affected individuals.
- Report to the Information Commissioner's Office (ICO) within 72 hours if the breach is likely to result in a risk to the rights and freedoms of individuals.
- Notify affected data subjects without undue delay where the breach is likely to result in a high risk to their rights and freedoms.

7. Responsibility and Review

The Board of Directors of Wrexham BID Ltd bears ultimate responsibility for compliance with this policy. The BID Manager is responsible for day-to-day implementation. This policy will be reviewed annually, or sooner following any material change in BID operations, applicable legislation, or ICO guidance.