

The Paddington Partnership (trading as Grand Union Business Improvement District) Privacy Policy

This privacy policy applies solely to information collected by Grand Union Business Improvement District (BID). The Grand Union BID promises to respect the personal data you share with us and keep it safe. We aim to be clear when we collect your data and not do anything you wouldn't reasonably expect. This privacy policy explains how we collect and process the personal data you provide us with.

How we collect information about you

The Grand Union BID collect personal data in a number of ways:

- When you subscribe to receive the Grand Union BID newsletter
- · When you enquire about or participate in a volunteering activity, networking or wellbeing event
- If you are a charitable organisation or school promoting a volunteering activity
- When you use our website

Subscribing to the newsletter

Grand Union BID only has access to the personal information that you voluntarily provide when you sign up to receive the BID newsletter and we only collect the information we require in order to distribute the electronic newsletter. The lawful bases for processing your data are consent, performance of contract and legitimate interest.

Grand Union BID use Mailchimp as our marketing automation platform. The personal information you provide will be transferred to Mailchimp for processing in accordance with their Privacy Policy and Terms.

When we email our newsletter subscribers we may track who opens the emails and clicks through the links. This allows us to measure the performance of our email campaigns. Grand Union BID will not communicate, spread, publish, sell, rent or otherwise give your personal information to anyone.

Participating in volunteering, networking or wellbeing events

If you contact us to enquire about a volunteering role, networking or wellbeing event or attend an activity organised by the Grand Union BID, personal data will be collected.

When you enquire about an event or activity

If you make an enquiry we will keep a record of your name and contact details and the types of volunteering or events you are interested in. We will only contact you about opportunities we think may be of interest for a maximum of five years following an initial enquiry. The lawful reason for doing this is legitimate interest. If you do not wish to receive follow up information about opportunities, you can ask for your personal data to be removed at any time by contacting us (our contact details can be found at the end of this Privacy Policy).

When you participate in an event or activity

If you participate in a voluntary activity or attend an event we will keep a register of names and contact details to keep you safe whilst participating (for fire evacuation purposes etc). We will notify you in advance if we need to

share your contact details with the charitable organisation you are volunteering for or the venue that are hosting the event and will be very clear when you register for an activity what will happen to your data.

We will keep a record of your participation in volunteering or attendance at events so that we can report your involvement to your employer as part of our annual cycle and impact reporting. The lawful reason for doing this is performance of contract. We will record details of the organisation you supported and the nature of the voluntary activity undertaken or the topic of the networking or wellbeing event you attended. This helps us to understand which opportunities may be of interest to you in the future. We will scan registration sheets following your activity and store a soft copy electronically for five years in a password protected folder, at which point the record will be destroyed. Hard copies of registration sheets will be destroyed immediately after events in document shredders or confidential waste. Please note, the names of individuals attending wellbeing events will **not** be shared with employers. We recognise that these topics can be sensitive and the individual's right to confidentiality. The total number of employees attending a wellbeing event from each company will be shared for reporting purposes.

Where individual participants are required to sign in at third party venues e.g. at a charity partner or venue hosting a networking event, personal data will be kept by the third party in line with their privacy policies. Individuals volunteering at schools should be aware that school sign-in systems typically retain records for at least six years according to the UK'S School Attendance Regulations 2024.

Act! CMR Database

When you enquire about or sign up to an event or activity, we will add your name to a CMS database called Act! All subsequent outgoing emails from Grand Union BID staff to you will be recorded on ACT. This means that all Grand Union BID colleagues are able to pick up enquiries, see past correspondence and support you in a timely manner. Access to the Act! CMR database is password protected and it is a licensed product.

Events with specific requirements

As a matter of course we do not collect or store sensitive data (e.g. allergies, emergency contacts and medical information), however there are some situations where this will occur, including:

- If you are participating in a volunteering, networking or wellbeing event and have declared a medical condition in advance
- If the nature of the event you are participating in requires that this information is known e.g., if you are volunteering in a kitchen environment we would need to know if you had any food allergies or if you are attending a networking event where catering is provided
- If an accident or incident occurs at an event an accident form will be completed at the site of the event by the venue host and a separate record will be kept by the Grand Union BID. This helps us to monitor and review all activities and ensure activities remain safe for all participants. A copy of the accident report completed by Grand Union BID will be sent electronically to the individual(s) involved. All accident records are kept for 30 years, in line with the requirements of our insurance provider, at which point they will be destroyed in confidential waste / electronic copies will be deleted.
- For some practical activities such as taking part in events on the canal or undertaking physical gardening tasks, we may ask volunteers for details of an emergency contact. This person will only be contacted in the event of an emergency and their personal details contained on any event paperwork will be destroyed immediately after the activity for which they were collected.

If we are going to collect any of this data we will communicate with you about the reasons for collecting it and how we will store it to ensure your privacy is maintained and gain your consent and permission to do this.

Some skilled volunteering may require greater information to be collected about a volunteer. For example, a copy of your CV may be requested prior to participation in a mentoring programme, to help match you to a mentee. In these instances the data we hold on you will be held only for the length of your involvement in the specific project, in password protected electronic folders. If the data is to be shared with a charity partner you will be informed in

advance and the Community Team will request that the charity partner destroy the material at the end of the project.

Safeguarding Checks

Grand Union BID does not undertake DBS or List 99 (safeguarding) checks on behalf of organisations it sends volunteers to and does not have access to the personal data you provide on these forms. The schools and charities we work with that require volunteers to complete DBS checks all have their own privacy policies and measures in place to keep your personal information safe. Occasionally we support volunteers by scanning copies of ID (passports, driving licence etc.) to help with completing DBS forms. In these instances all scanned ID is destroyed immediately once the DBS check is completed and stored in password protected folders whilst held by us. If you have any questions about the process of completing a DBS check and who will have access to the information you provide, please contact us (our contact details can be found at the end of this Privacy Policy). If a DBS check were to flag a safeguarding concern, the Grand Union BID and the charity partner would keep this information confidential; unless the volunteer's paid employment involves them working with vulnerable people. It is the employer's responsibility to carry out appropriate due diligence checks on employees.

Testimonials and feedback

You may be asked to complete an anonymous feedback form at the time of the event, or subsequently via an electronic platform e.g. Survey Monkey. Our Community Team may also ask you to provide a quote about your experience. The information you provide helps us to ensure we deliver high quality, meaningful activities and contributes to our annual billing leaflet, issued alongside bills to all BID members. Feedback forms are kept for a maximum of five years before being destroyed.

Event photography and film footage

We will ask for your consent at the start of events to take photographs and only photograph you if you have given specific permission. At larger events such as Earth Day, where volunteers from multiple companies are participating, and particularly where we are employing a professional photographer, it will be made clear both during written briefing documents and in verbal briefings at the event that photographs are being taken. It is then the responsibility of individual volunteers to notify Grand Union BID staff that they do not want to be photographed and to opt out. We will then ensure that you are not captured in photographs.

These photographs and film will be used on our website, social media and in marketing collateral; and copies will be shared with all participants / attendees. A selection of photographs may also be shared with our charity partners from volunteering events, particularly if they contain the charity partner's service users or clients. Photographs will be kept by charity and school partners in line with their own privacy policies.

Grand Union BID may keep copies of photographs and film taken at events indefinitely. This is in order to keep an accurate record of events and activities delivered by the BID and to enable us to continue to document the development history of Paddington and recognise the people who played a part in its evolution. One of our objectives is to reflect, report on and celebrate the story of Paddington and photographs and film footage are essential to maintaining this accurate historical record.

Once photographs are saved on the Grand Union BID secure drive they will be deleted from Paddington Partnership employees' phones / cameras. Photographs and videos will be taken on employees' work phones as opposed to personal devices.

Respecting your right to confidentiality

Information and experiences colleagues disclose during wellbeing events will be treated with total confidentiality and the individual names of colleagues attending these events will not be shared with employers. Grand Union BID recognises that some employees may not want to disclose their reasons for attending workshops or talks on some wellbeing topics to their employer. If there is concern that there may be a danger to life following a disclosure during

an event, Grand Union BID or the third party delivering material on our behalf may reach out to an individual directly to signpost to an appropriate agency.

As a charity or school promoting a volunteering activity

If you are an organisation looking to promote a volunteering role via Grand Union BID, we will collect your contact details so that we can keep in touch with you about potential volunteers. If you no longer wish to recruit volunteers and do not want us to contact you, you can ask for your contact details to be removed at any time. Our contact details can be found at the end of this privacy policy.

Act! CMR Database

When you enquire about recruiting volunteers or ask us to promote an event, we will add your organisation and name to a CMS database called Act! The details of your volunteering activity can be recorded here, making event information available to all Grand Union BID colleagues quickly and increasing the likelihood of us being able to support you. All subsequent outgoing emails from Grand Union BID staff to you will be recorded on ACT. This means that all Grand Union BID colleagues are able to see past correspondence and support you in a timely manner. Access to the Act! CMR database is password protected and it is a licensed product.

Event photography and film footage

With your consent, and that of the participating volunteers, photographs (and occasionally film) will be taken at volunteer events. These photos and film will be used on our website, social media accounts, in marketing collateral and impact reports. A selection of photographs taken at volunteer events will be shared with the charity partner, including all of those which include service users / clients. We will always follow the photography policy of a charity partner. We may keep photographs and film taken at volunteer events indefinitely. This is to enable us to complete one of our core objectives - to accurately document the development history of Paddington and recognise the people who played a part in its evolution. We would ask that charity partners delete any photographs or film we share with them in line with your own privacy policies, although are aware that images may remain on social media pages, website and in printed literature.

Events with specific requirements

Some volunteering activities may require personal data about your clients, service users or students to be shared with Grand Union BID and our volunteers. For example, if volunteers are delivering a mentoring programme or conducting mock interviews, they may be given copies of CVs. In these instances we request that CVs do not contain full names or personal contact information (address, email etc). The CVs will be destroyed by us at the end of the volunteering project. Vice versa if volunteers' CVs are shared with you in order to match to mentees, for example, we request that they are destroyed immediately after the project.

Virtual volunteering activities and events

Occasionally Grand Union BID hosts virtual volunteering activities or arranges talks or workshops for our members that are held virutally. This activity is also covered by our privacy policy. To protect attendees, charity partners and their service users:

- Volunteers and service users participating in virtual events on Zoom or Microsoft Teams e.g. quizzes, careers
 guidance talks or workshops are contacted separately with log in details so that email addresses are not
 shared. All virtual events are hosted by a Grand Union BID colleague for safeguarding and to ensure their
 smooth running.
- All virtual talks involving young people (e.g. career talks and assemblies) are recorded by the participating school or college for safeguarding. These videos are stored by the school or college in line with their privacy policies. A member of school staff will always be present at virtual sessions for safeguarding and to oversee their smooth running.

- Where mentoring programmes are delivered virtually, participating volunteers will be required to complete a DBS check in advance (organised by the host organisation), if they are working one-to-one with students under the age of 16 or with vulnerable adults (e.g. young care leavers up to the age of 25).
- With the consent of participants, screen shots may be taken at events to provide a record of activity. These
 images may be used on social media and the Grand Union BID website to raise the profile of virtual activity.
 Like other photographs taken by Grand Union BID, these may be stored by us indefinitely, to enable us to
 continue to accurately record and report on the development of Paddington.

Using our website

Like many websites, the Grand Union BID website uses 'cookies' to help us make our website – and the way you use it – better. Cookies mean that a website will remember you. They're small text files that sites transfer to your computer (or phone or tablet). They make interacting with a website faster and easier – for example by automatically filling your name and address in text fields.

In addition, the type of device you're using to access our websites or apps and the settings on that device may provide us with information about your device, including what type of device it is, what specific device you have, what operating system you're using, what your device settings are and why a crash has happened. Your device manufacturer or operating system provider will have more details about what information your device makes available to us. We use Google Analytics to track visits to our website (e.g. which pages are visited the most). The lawful bases for processing the data you provide us with are consent, performance of contract and legitimate interest.

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information that you provide whilst visiting such sites, and such sites are not governed by this Privacy Policy.

What we do with the information you provide

We will use the data we collect to undertake the following actions:

Day to day operations

- Email you directly about opportunities or events which we believe may be of interest based on our previous communication with you. For example, if you have previously told us you enjoy gardening and we are urgently looking for a volunteer to help with a gardening project; or if you are a charity and we hear of an exciting fundraising opportunity we believe may be of interest to you
- If you are new to working Grand Union BID we may email you separately to welcome you and offer our services.
- To share the newsletter with you, keeping you informed of upcoming events, opportunities, development in Paddington and offers

Reporting

• We will produce impact reports, infographics and case studies using photographs, quotes and data gathered at events and from any follow-up surveys or correspondence. If we have the explicit and informed consent from all parties represented in the case study, this information may be made public by us at events, in materials promoting our work (including on our website) or in documents such as our annual billing leaflet.

How we look after your personal information and keep it safe

Grand Union BID has measures in place to protect information you provide us with.

Only employees who need information to perform a specific job (e.g. producing volunteer impact reports) have access to your personal information. Our staff receive training and support on how to keep online and paper-based records safe from cyber-attack, misplacement, loss or breach - both in and out of our office premises.

The computers and servers on which your personal information is stored are password protected with firewall controls and kept in a secure environment. All computers and mobile phones have two-factor authentication.

Any personal information stored on paper is locked away when not in use and disposed after use securely using document shredders or confidential waste.

Any personal information you send to us in writing or by email may be insecure during transit and Grand Union BID cannot guarantee its delivery.

We may need to disclose your details if required to the police, regulatory bodies or legal advisors. We will only ever share your data in other circumstances if we have your explicit and informed consent.

How long will we keep your information?

We only hold your information for as long as is necessary for the purpose we are holding it and regularly review the information we hold and delete what is no longer required.

- We hold records relating to volunteering activity and events for five years to enable us to track the impact and reach of the BID over its term.
- We hold photographs and film from events indefinitely. Photographs and film are such a powerful tool to help showcase the impact of our work and document the development of Paddington over time.
- We hold project specific information e.g. CVs for the length of the project. If a particular volunteer or participant leaves the project early, their data will be destroyed at the time of their departure.
- We are in ongoing contact with our charity partners and so constantly review, update and delete opportunities as appropriate

How to access the information we store about you

You may opt out of receiving communications at any time. Please email volunteer@thisispaddington.com to:

- See what data we hold about you
- Update or correct any data we hold about you
- Request for the data we hold on you to be deleted
- Express any concerns you have about our use of your data

Grand Union BID may require a copy of appropriate evidence such as a passport, driving licence, recent bank statement or utility bill prior to responding to a subject access request, in order to verify your identity. Grand Union BID will respond to all requests related to your personal information within one month of receipt.

Updates to this Privacy Policy

This Privacy Policy will be reviewed from time to time and any updates made to The Grand Union BID Privacy Policy will be shown on this page. If we make any significant changes in the way we treat your personal information we will make this clear on our website and may contact you directly.

Our contact details

The Paddington Partnership is registered in England under company number 4193693.

The registered office is The Paddington Partnership, 7 Praed Street, London W2 1NJ.

The Paddington Partnership is the legal entity of the Grand Union BID.

If you have any concerns or questions about this Privacy Policy, please contact us by calling the main office on 020 3145 1200 or by emailing volunteer@thisispaddington.com.

Last updated June 2025.