

MILLENNIUM POINT PROPERTY LIMITED **PRIVACY POLICY AND COOKIES POLICY**

We at [Millennium Point Property Limited] of Millennium Point, Curzon Street, Birmingham, B4 7XG (registered Number: [03296443]) (“we” or “our” or “us”) want to make sure all the personal information we have collected about you is safe and secure whether we collect it through our website at [www.millenniumpoint.org.uk] (“Site”) or from other sources. This Policy set outs our commitments to you, in compliance with and beyond the General Data Protection Regulation (commonly known as the **GDPR**) and explains how we collect, store and use your personal information.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we not required to do so, but our GDPR Compliance Manager has overall responsibility for data protection compliance in our organisation. If you have any questions about this Policy or what we do with your personal information, their contact details are set out in the "**Contact**" section below.

PRIVACY NOTICES

Collecting specific, relevant personal information is a necessary part of us being able to provide you with any services or products you may request from us or in providing services or products to our customers and members, providing you with information you have requested or just managing our relationship with you, whoever you are.

When we hold or use your personal information as a **data controller or controller** (*see below for a description of what this is*) we will provide you with a privacy notice which sets out in detail what information we hold about you (such as your contact details, address, etc.), how your personal information may be used and the reasons for these uses, together with details of your rights.

Where we collect personal information from you directly, we will provide this privacy notice at the time we collect the personal information from you. Where we receive your personal information indirectly, we will provide this privacy notice when we first contact you, first pass the data to someone else or within a month, whichever is the earlier.

We will only provide this privacy notice to you once, generally at the start of our relationship with you. However if the applicable privacy notice is updated substantially, then we may provide you with details of the updated version. You are encouraged to check back regularly for updates.

Copies of our current privacy notices can be found below:

- [Prospective employee privacy notice](#)
- [CCTV privacy notice](#)
- [Privacy notice for everyone else external to our organisation](#)

Please note that it is possible for you to be covered by more than one privacy notice, for example you may be a customer who comes onto our premises and is recorded on CCTV. In this example both our customer privacy notice and our CCTV privacy notice would apply to you, but for different categories of your personal information.

THE DIFFERENCE BETWEEN DATA CONTROLLERS/PROCESSORS

A **data controller or controller** is a person who controls how personal information is processed and used. Data controller or controller are two terms that mean the same thing. A **data processor** is a person who processes and uses personal information in accordance with the instructions of a third party, i.e. the data controller or controller.

This distinction is important. You have certain rights in relation to your personal information, for example the right to be provided with the personal information held about you and details of its use and the right to have certain of your personal information either erased or anonymised, commonly referred to as the right to be forgotten (*see below to see what rights you have*). These rights can generally only be exercised against a controller of your information.

In most cases we will be a controller of your personal information. In any case where we are not a controller this means that you cannot exercise these rights against us directly (i.e. where we only act as a data processor), but you can do so against the controller (i.e. the person who controls how we process the personal information). In these cases we will endeavour to inform you who is the controller of your personal information so that you can direct any such requests to them.

Also it is only a controller that will provide you with a privacy notice about your personal information, so where we process your personal information as a controller we will provide you with a privacy notice. Where we process your personal information as a data processor for a third party, that third party should provide you with a privacy notice which will set out details regarding the processing of your personal information, which should also include the processing to be carried out by us on their behalf.

HOW DO WE USE YOUR PERSONAL INFORMATION?

Where we are a controller we will use your personal information as described in the privacy notice provided to you, but, for example, we may use your personal information to administer any account(s) you have with us or to send you information we think you might find useful, provided you have indicated that you are happy to be contacted for these purposes. To see how we use your personal information as a controller, please see our current privacy notices, which can be accessed below:

- [Prospective employee privacy notice](#)
- [CCTV privacy notice](#)
- [Privacy notice for everyone else external to our organisation](#)

WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?

Details of how we disclose your personal information are set out in the relevant privacy notice provided to you, but generally it is where we need to do so in order to run our organisation (e.g. where other people process information for us). In such circumstances, we will put in place arrangements to protect your personal information. Outside of that we do not disclose your personal information unless we are required to do so by law.

If we as a controller transfer personal information about you outside the European Economic Area (EEA), we will let you know and ensure that all reasonable security measures are taken and that any third party processors will be required to process the information in accordance with information protection laws and we will notify you in your privacy notice if we are the information controller.

We do not sell, trade or rent your personal information to others.

HOW LONG DO WE HOLD ON TO YOUR PERSONAL INFORMATION?

Further details of how long we hold onto your personal information for are set out in the relevant privacy notice provided to you, but we will only hold your information for as long as is necessary or where you ask us to delete records we may delete it earlier.

The duration for which we retain your personal information will differ depending on the type of information and the reason why it was collected. However, in some cases personal information may be retained on a long term basis: for example, personal information that we need to retain for legal purposes will normally be retained for at least six years in accordance with usual commercial practice and regulatory requirements.

WHAT ARE YOUR RIGHTS?

Full details of your rights set out in the relevant privacy notice provided to you, but you are entitled by law to ask for a copy of your personal information at any time. You are also entitled to ask us to correct, delete or update your personal information, to send your personal information to you or another organisation and to object to automated decision making. Where you have given us your consent to use your personal information in a particular manner, you also have the right to withdraw this consent at any time.

To exercise any of your rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "**Contact**" section below. You can also unsubscribe from any **direct marketing** by clicking on the unsubscribe link in the marketing messages we send to you.

You should note that some of your rights may not apply as they have specific requirements and exemptions which apply to them and they may not also apply to personal information recorded and stored by us. However your right to withdraw consent or object to processing for direct marketing are absolute rights.

If you are unhappy with the way we are using your personal information you can complain to the UK Information Commissioner's Office or your local data protection regulator. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>. However, we are here to help and would encourage you to contact us to resolve your complaint first.

LINKING WITH THIRD PARTY SITES

Our Site may, from time to time, contain links to and from the websites of our commercial partners and advertisers. If you follow a link to any of these websites, please note that these websites have their own privacy policies and they will be a data controller of your personal information. We do not accept any responsibility or liability for these policies and you should check these policies before you submit any personal information to these websites.

In addition, if you linked to this Site from a third-party site, we cannot be responsible for the privacy policies and practices of the owners or operators of that third-party site and recommend that you check the policy of that third party site and contact its owner or operator if you have any concerns or questions.

SECURITY

We employ a variety of technical and organisational measures to keep your personal information safe and to prevent unauthorised access to, or use, or disclosure of it. Unfortunately, no information transmission over the Internet is guaranteed 100% secure nor is any storage of information always 100% secure, but we do take all appropriate steps to protect the security of your personal information.

COOKIES

Certain parts of our Site use "cookies" to keep track of your visit and to help you navigate between sections. A cookie is a small data file that certain websites store on your computer's hard-drive when you visit such websites. Cookies can contain information such as your user ID and the pages you have visited. The only personal information a cookie contains is information that you have personally supplied.

We use cookies on our Site to enable us to deliver content that is specific to your interests and gives us an idea of which parts of the Site you are visiting and to recognise you when you return to the Site. Reading cookies does not give us access to other information on your computer's hard-drive and our Site will not read cookies created by other websites that you have visited.

Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. This data may be stored outside the EU, under a EU-US Privacy Shield agreement. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. If, however, you select this setting you may be unable to access certain parts of the Site. Unless you have adjusted your browser settings so that it will refuse cookies, our system will issue cookies when you access the Site.

Please note providers of third party content may also use cookies over which we have no control. For detailed information on the cookies we use and the purposes for which we use them see the table at the end of the policy.

LOG FILES

In common with most websites, our Site logs various information about visitors, including internet protocol (IP) addresses, browser type, internet service provider (ISP) information, referring / exit pages and date / time stamp.

We may use this information to analyse trends, administer the Site, track your movement around the Site and gather broad demographic information.

CHANGES TO THIS POLICY

Any changes we may make to this Policy in the future will be posted on our Site and, where appropriate, notified to you by e-mail. When we change this Policy in a material way, we will update the version date at the bottom of this page. Please check back frequently to see any updates or changes to this Policy and should you object to any alteration, please contact us as set out in the "Contact" section below.

CONTACT

In the event of any query or complaint in connection with the information we hold about you, please email gdprcompliance@millenniumpoint.org.uk or write to us at GDPR Compliance Manager, Millennium Point, Level 4, Millennium Point, Curzon Street, Birmingham, B4 7AP.

Whilst this privacy policy sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

Cookie Name	Used by	Description	Expiration
__utma	Google Analytics	Stores the amount of visits of a user, the time of their first visit, the previous visit, and the current visit. It does not contain any personal information and is used only for analytical purposes.	2 years from set/update
__utmz	Google Analytics	This performance cookie stores where a user came from (eg. search engine, search keyword, link).	6 months from set/update
_ga and _gid	Google Analytics	Used to distinguish between website users in Google Analytics.	2 years and 2 hours
_gat_UA-XXXXXXX-X (where the Xs are replaced by the Google Analytics ID number)	Google Analytics	Used to moderate calls to the Google Analytics service.	1 minute
cc_cookie_accept	Website	Stores whether the user has accepted the cookie message or not.	365 days
ASP.NET_SessionId	Website	Used for authenticating a user's session after logging in. Closes when you exit the browser.	End of session
ARRAffinity	Website	Tells our infrastructure which server to handle the request.	End of session
MemberLoggedIn	Website	A binary flag which stores whether a user is logged in or not.	End of session
ai_session and ai_user	Website	Tracks users as they navigate the website predominately for infrastructure performance insights.	1 day

1. Policy Control

Date of Issue:	24-5-18	Next Review Date:	24.5.20
Version:	1.1	Last Review Date:	02.08.19
Document Owner:	Vanessa Currie, Head of PLD		
Department:	People, Learning & Development		
Policy Approval Route			
Policy Ref. No.	Policy Name	Approved By:	Date Approved:
	External Facing Privacy Policy	Executive team	May 2018

2. Amendments

Issue:	Policy Ref. No.:	Date:	Reason for Change:	Authorised by:
1.1	1.1	02.08.2019	Annual Review – sent to Exec Team 05.06.2019 no changes.	Abbie Vlahakis – Interim CEO Rebecca Delmore – Commercial Director Linda Degg – Facilities Director JJ Mian – Interim Finance Director