



DATA PROTECTION PRIVACY NOTICE FOR: Council Tax, Business Rates, Business Improvement District; and COVID19 related Business Grants

Why are we providing this Notice to you?

The Council, in its capacity of Data Controller, holds certain information about you ["personal data"] which it needs to process for the purpose of providing the following services of levying, collecting and recovering Council Tax, Business Rates and Business Improvement District.

It also has the duty of processing applications made under in respect of Covid Business Support Grants. These include payments made from the Small Business Grant Fund, and the Retail, Hospitality and Leisure Fund, Discretionary Business Grant Fund, the Local Restrictions Support Grants, Christmas Support for Pubs, January 2021 Lockdown payments, the Additional Restrictions Grant and the Restart Grants on behalf of the Department for Business, Energy and Industrial Strategy.

This Notice is designed to give you information about the personal data we hold about you, how we will use it, your rights in relation to it and the safeguards that are in place to protect it. Further information is contained in the Council's Generic Data Protection Privacy Notice at: www.hillingdon.gov.uk/privacy

What personal data do we hold?

The types of data we hold, and process will typically include:

- The names, addresses and gender of the parties liable for Council Tax
- Bank account details
- Previous address information of a chargepayer
- Details of the landlord or managing agent
- The names of other occupiers of that address
- Information obtained to consider the award of exemptions, discounts or disabled band reduction. This sometimes includes dates of birth and medical/disability information
- The amount of Council Tax Reduction entitlement

In the case of people subject to legal proceedings for arrears we may hold information relating to their employer, their social security benefits, and their income, their National Insurance number, and other debts/arrangements which they have.

We hold information to levy, collect and recover Business Rates; and to levy, collect and recover Business Improvement District.

Contact information including email addresses and telephone numbers. We use this data in connection with the charge payer's account.

In respect of the COVID19 grant data we typically hold:

- The name of the business /sole trader
- The address of the business and the date it was established
- The Type of grant
- Application details
- Whether it is awarded
- A reference number such as:
 - Company Reference Number
 - Value Added Tax Registration Number
 - Self-assessment Number
 - Partnership Number
 - National Insurance Number
 - Unique Taxpayer Reference Number
 - Registered Charity Number
- The size of the business/ no of employees
- The business sector and /or SIC code
- The amount of grants paid
- The date paid

Where we obtain data from

Most of the data we receive is from you, or joint charge payers, or former charge payers, or an agent (such as a landlord, letting agent or solicitor). Often the data relates to the occupation of a dwelling, and the names and dates of occupation for liable parties. Sometimes information is needed to grant an exemption or a discount, this includes information to grant Single Person Discount, Over 65's discount, student exemption or discount, and exemption or discount due to Severe Mental Impairment (your doctor will supply data in this regard).

We may receive payments from your bank, your bank will have a data controller.

In the case of recovery of arrears of Council Tax, Business Rates and Business Improvement District we may receive data from our enforcement agents who currently are:

- Phoenix Commercial Collections
Contact: central@pheonixcommercial.co.uk or The Data Protection Officer, Phoenix Commercial Collections, AMP House, Dingwall Road, Croydon, CR0 2LX
- Bristow and Sutor
Contact: dataprotection@bristowsutor.co.uk or The Data Protection Officer, Bristow and Sutor, Bartleet Road, Washford, Redditch, Worcestershire, B98 0FL
- Stanford and Green Civil Enforcement
Contact: info@stanfordandgreen.co.uk or Martin Stanford (The Data Protection Officer), Stanford and Green Civil Enforcement, Knighttrider Chambers, Knighttrider Street, Maidstone, Kent, ME15 6LP
- London Warrant Enforcement Ltd (Business Rates and Business Improvement District only)
Contact: enquiries@lw-e.co.uk or The Data Protection Officer, London Warrant Enforcement Limited, 20-22 Wenlock Road, London, N1 7GU

In the case of recovery of arrears of Council Tax, we sometimes receive data from the Department of Work and Pensions. Please contact your Jobcentre Plus Office or www.gov.uk/government/publications/dwp-request-for-personal-information.

Sometimes in the case of arrears we arrange with your employer to have the arrears deducted from your wages as permitted by law. 3

What is our purpose for processing your personal data?

- To levy, collect and recover the Council Tax.
- To levy, collect and recover Business Rates.
- To levy, collect and recover payments for the business improvement district.
- To administer business grants as a result of the COVID19 pandemic.
- 'if we intend to process your personal data for a purpose other than that for which the personal data was collected, we shall provide you details of that other purpose before we start processing your data'.

What is the legal basis for our use of your personal data?

- We need it to comply with a legal obligation
- We need it to perform a task in the public interest or in the exercise of public authority

What we do if your personal data is sensitive?

We will only process your sensitive personal data with your consent, unless we can lawfully process it for another reason permitted by law. We will notify you if it is sensitive and as with non-sensitive personal data, you have the right to withdraw your consent to processing at any time by letting us know. Sensitive data is data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic and biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation.

For how long we will hold your personal data?

We will only keep your personal data for as long as we need to in order to fulfil the purpose[s] for which it is collected and for so long afterwards as we consider it may be required to deal with any questions or complaints about the service which we provide to you, unless we elect to retain your data for a longer period in order to comply with our legal and regulatory obligations.

Organisations that we may share your personal data with

Typically, the organisations we share your data with are:

- Enforcement Agents
- Courts and Tribunals
- The Valuation Office Agency
- The Department of Work and Pensions
- Banking organisations
- Other councils when permitted by law or consent
- Representatives, appointees and agents of charge payers

It may be shared with external auditors.

In the case of business support grants we may share your data with the Department of Business, Energy and Industrial Strategy, other government departments for monitoring and evaluation purposes, prevention and detection of fraud and or/ other criminal activities as well as for suspension and/or recovery of the grant where necessary. The Government may

share information for the purpose of counter fraud activity and debt recovery with other government departments, agencies and/or local authorities.

Bills and other notices are printed by an external printer.

When recovering arrears of Council Tax, we may contact your employer in respect of an attachment to earnings.

We use a company called Liberata to carry out work for us across a range of the services covered by this statement.

We also use Capacity Grid (related to Liberata) to carry out work in limited areas.

The Royal Mail delivers post for our service.

Some information is shared with Uxbridge Business Improvement District Limited.

Corvid Paygate in respect of some of our banking arrangements.

Equifax credit reference agency.

In respect of exemptions and discounts with Her Majesty's Prison Service.

In respect of exemptions and discounts with Medical Practitioners.

The Office of National Statistics (ONS).

We may share data with licensed insolvency practitioners.

It may be shared with The Local Government and Social Care Ombudsman.

Internal Sharing of data

We may share some of your data with other services within the London Borough of Hillingdon. Common examples include:

- Counter Fraud
- Complaints and Enquiries
- Benefits
- Planning Services
- Electoral Registration Services
- The Business Improvement Team.
- The Food Safety Team.
- The Financial Assessments Team.
- The Corporate Collections Team.
- Housing Services including Private Sector Housing.
- Adult Social Care (especially to assist in contacting vulnerable people during the COVID 19 Crisis).

Each of these services (where required) has a privacy notice detailing the legal basis on which they process the data.

- The Communications Team
- The Hillingdon First Card Team
- SEND and Inclusion Team
- Licensing and Regulatory Services

What happens if your personal data is subject to automated decision-making including profiling?

We will inform you of the existence of this as well as the significance and the envisaged consequences of such processing for yourself. Automated decision making takes place in the levying of bills and the early stages of collection, and the collection of direct debit and standing order payments. The issuing of recovery summonses, and other recovery functions are subject to staff checking.

Your rights

You have a right to access and obtain a copy of the personal data that we hold about you and to ask us to correct your personal data if there are any errors or it is out of date. In some circumstances, you may also have a right to ask us to restrict processing of your data until any errors are corrected, to object to processing or to transfer or [in very limited circumstances] erase your personal data. You can obtain further information about these rights from the Information Commissioner's Office at: www.ico.org.uk or via their telephone helpline [0303 123 1113].

If you wish to exercise any of these rights, please contact The Council Tax, Business Rates, and Business Improvement District Team (contact details below). You also have the right to lodge a complaint in relation to this Privacy Notice or our processing activities with the Information Commissioner's Office, which you can do through the website above or their telephone helpline.

We may from time to time ask for further information from you. If you do not provide such information or ask that the personal data we already hold is deleted or restricted, this may affect the service that we provide to you.

Updates

We may update this notice periodically. Where we do this, we will inform you of the changes and the date on which the changes take effect.

Contacting us

Please contact The Council Tax, Business Rates, Business Improvement District Team; and COVID19 related Business Grants for further information
London Borough of Hillingdon Revenue Services
PO Box 1120
1 Market Street
Nelson
Lancashire
BB9 7LJ
Email counciltax@hillingsdon.gov.uk
Email businessrates@hillingsdon.gov.uk

Statutory Data Protection Officer

You may also contact our data protection officer for further information:
Raj Alagh, Borough Solicitor and Monitoring Officer
Data Protection Officer
Civic Centre
High Street
Uxbridge
UB8 1UW
Email emailralagh@hillingsdon.gov.uk
Telephone 01895 250617