



Warwickshire Retail Crime Initiative

Privacy and Data Handling Policy

Working in Partnership to Create a Safer Business Environment
Member of National Association of Business Crime Partnerships

1. Privacy Policy Introduction

- a. The Warwickshire Retail Crime Initiative Limited (WRCI) is a County wide, membership organisation employing a Partnership approach to prevent and reduce crime and anti-social behaviour in retail and licensed business premises in Warwickshire.
- b. Members are supported by the provision of 'target packages' of individuals where their criminal or anti-social behaviour satisfies the criteria for inclusion in the package
- c. Individual targets may be 'excluded' from members premises.
- d. WRCI is committed to handing, processing and protecting all data it handles in accordance with the General Data Protection Regulations (GDPR) 2018 and the Data Protect Action 2018.
- e. WRCI is registered with the Information Commissioner for the purpose of 'the prevention and detection of crime and the prosecution of offenders', Registration Number Z9138572.

2. Contact Details

Warwickshire Retail Crime Initiative, Community Protection Team, Leamington Police Station, Warwick Justice Centre, Newbold Terrace, Leamington Spa, Warwickshire CV32 4EL

3. Data

- a. WRCI holds data on members, targets and from information reports supplied by members. All membership data is held on password protected computers within the protected Warwickshire Police computer network.
- b. The WRCI Board has appointed the Data Controller and the Data Processors are the WRCI Administrators employed by WRCI Limited.
- c. WRCI does not have a data sharing agreement with any party other than members.

4. Membership Data

- a. WRCI holds the business name and address, contact names, contact emails, contact telephone numbers and information provided for invoice purposes of members.
- b. WRCI will not provide any membership data to any third party unless the member gives permission.
- c. WRCI does not collect any sensitive or 'special category' personal data (ethnicity, sexuality, religious beliefs etc) in respect of members.

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www.wrci.org.uk



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5. Target and target data

- a. In the development of a 'target' for inclusion in a 'target package' provided to members WRCI will collect data from information reports and data from and through Warwickshire Police under a data sharing agreement.
- b. This information may include sensitive or 'special category' personal data (ethnicity, sexuality, religious beliefs etc), only if it is necessary and proportional to record this information.
- c. WRCI does not collect or process any data on a person under 16 years of age. We may process data a person aged 16 to 17. Each instance will be holistically assessed against necessity, proportionality, threat and risk.
- d. An individual will only be classified as a 'target' if they satisfy the criteria in the WRCI protocols.

6. Individual Rights

- a. An individual may ask for a details of the personal information that WRCI holds about them (subject access request) to have any inaccuracies in the information corrected.
- b. Where WRCI holds data for which they are not the data controller, they will not release that data.
- c. It may be necessary to redact (censor or obscure) some data for legal or security purposes, especially if the information is concerning another Individual or classed as confidential.
- d. If a named person is the subject of an information report, is designated as a 'target' or is 'banned from scheme premises' they will be informed in writing normally via the post to their last known address.

7. Subject Access Request

- a. Subject access requests should be made in writing to the Warwickshire Retail Crime Initiative, Community Protection Team, Leamington Police Station, Warwick Justice Centre, Newbold Terrace, Leamington Spa, Warwickshire CV32 4EL.
- b. These will be answered with 30 days. There is no fee. Personal identification is required such a passport or photo driving licence.

8. Exclusions

An individual may be excluded from all member premises if they satisfy the criteria in the WRCI Exclusion Policy.

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9. WRCI Website

WRCI has a website, wrci.org.uk. The website does not have any cookies for tracking visitor activity. WRCI does not collate any information on the identification of visitors.

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