



# HILLINGDON

LONDON

## **DATA PROTECTION PRIVACY NOTICE FOR: Council Tax, National Non-Domestic Rates (Business Rates), Business Improvement District Levy, COVID19 related Business Grants, and The Council Tax Energy Rebate Payment.**

### **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. Historically it processed COVID19 Business Grants and The Council Tax Energy Rebate Payment.

It also has the duty of processing applications made under the Small Business Grant Fund, and the Retail, Hospitality and Leisure Fund, and the Discretionary Business Grant Fund on behalf of the Department for Business, Energy and Industrial Strategy.

It also played the major role in The Council Tax Energy Rebate Payments for the Department of Levelling Up, Communities and Housing.

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](http://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, Business Rates and the other services covered by this notice.

Bank account details.

Previous address information of a chargepayer.

Details of the landlord or managing agent.

Details of the owner of a property.

The names of other occupiers of that address.

Information obtained to consider the award of exemptions, discounts, disabled band reduction or to apply the empty home premium. This sometimes includes dates of birth, medical/disability/hospitalization information, empty property, student course details, and details of imprisonment.

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.

There is an historic over 65 pensioners discount which is closed to new applicants but exists as a transitional award for previous applicants. We therefore know the age details of some charge-payers.

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 (now closed) we typically hold:

The name

The address

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. The business sector. The amount. The date paid.

In respect of the Council Tax Energy Rebate for 2022/23 (Council Tax bands A-D) we will hold details of liable parties as of 1 April 2022 and their bank account details.

## **Where we obtain data from**

Most of the data we receive is from you, or joint chargepayers, or former chargepayers, or an agent (such as a landlord, letting agent or solicitor).

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:

CDER Group (previously called Phoenix Commercial Collections). Contact: [cderprivacy@cdergroup.co.uk](mailto:cderprivacy@cdergroup.co.uk) or The Data Protection Officer, CDER Group, 9<sup>th</sup> Floor Peninsular House, Monument Street, London, EC3R 8LJ.

Bristow and Sutor Group. Contact: [dataprotection@bristowsutor.co.uk](mailto: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](mailto:info@stanfordandgreen.co.uk) or Stanford and Green Civil Enforcement, Knightrider Chambers, Knightrider Street, Maidstone, Kent, ME15 6LP.

Also, 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](http://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.

The Valuation Tribunal Service may supply us with details of a Tribunal decision.

We may obtain details of ownership from the Land Registry Records.

We may obtain information from other Councils.

We may receive data from Insolvency Practitioners.

Sometimes advice agencies or a Member of Parliament make enquiries on behalf of Council Tax and Business Rates payers.

## **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 previously administer business grants because of the COVID19 pandemic.

To historically administer and pay The Council Tax Energy Rebate Payment.

We may use bank account details to pay any entitlement to Household Support payments.

'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. We currently retain data indefinitely because there are some statutory requirements that we would be unable to comply with if the data was deleted.

## **Organisations and persons 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 (including the Pension Service)

The Department of Business, Energy and Industrial Strategy. The

Department of Levelling Up, Communities and Housing.

His Majesty's Revenue and Customs

The Home Office

Banking organisations

Other councils when permitted by law or consent Representatives, appointees and agents of chargepayers.

It may be shared with external auditors.

Bills and other notices are printed by an external printer.

Our enforcement agents may use an external letter printer and a system to transfer the data.

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

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

We may 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.

Pay-e-net computer system.

Oracle Financials computer system.

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 and Debt Advise Providers. It may be shared with The Local Government and Social Care Ombudsman. Your member of parliament if they make an enquiry on your behalf.

### **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 Members Enquiries Team

Elected Councillors who make an enquiry on your behalf

The Benefits Service

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 are processing the data. The Communications Team

The Hillingdon First Card Team

SEND and Inclusion Team

Licensing and Regulatory Services

Checking admission applications for schools

Hillingdon Advice Partnership

Anti - Social Behaviour and Environmental Protection Team

### **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.

We are using automation in the administration of some student exemptions.

## **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](http://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

[counciltax@hillingdon.gov.uk](mailto:counciltax@hillingdon.gov.uk) [businessrates@hillingdon.gov.uk](mailto:businessrates@hillingdon.gov.uk)

London Borough of Hillingdon  
Revenue and benefit Service  
PO Box 651  
Darlington  
DL1 9HY

## **Statutory Data Protection Officer**

You may also contact our data protection officer for further information:

Data Protection Officer  
Legal Services  
Civic Centre  
High Street  
Uxbridge  
UB8 1UW

Email: [DPO@hillington.gov.uk](mailto:DPO@hillington.gov.uk)