

Amazing Spaces, Smart Places

privacy notice

Location – Girdwood Park

Belfast City Council (BCC) is carrying out a new pilot project to design and build a platform to allow park managers to see usage, movement analytics and the duration individuals spend on BCC owned sports pitches. It will allow BCC to increase park resources, enable park managers to deter anti-social behaviour and to build on existing pitch booking solutions. The focus of this specific project is on Girdwood Park and it is composed of two different parts.

Firstly, BCC will install a number of WiFi probe devices which will be used to capture 'ad hoc' movement through Girdwood Park. Mobile phone MAC Addresses are captured by the devices and are immediately anonymised by using a secure code on the user's Mac address every time they ping the device. The result being that these addresses are encrypted and anonymised. This means that once the initial data is captured, it immediately becomes anonymous and is held in this format for the purposes of the pilot project.

The lawful basis under the General Data Protection Legislation (GDPR) for the initial gathering of an individual's personal data in this situation is as follows:-

GDPR - Article 6 (1) (e) the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in BCC.

Belfast City Council (BCC) is the Data Controller under the General Data Protection Regulation (GDPR) for the data it initially gathers for the pilot project. However, it has contracted '**Pitchbooking**' to manage the project and act on its behalf in the capacity of a Data Processor and working under instruction from BCC.

Anonymised data is used solely for the purposes of monitoring movement and usage of pitches in Girdwood Park during specific times, which are set by BCC.

Only Pitchbooking and BCC will have access to the anonymised data, which may be shared internally with each organisation's staff who are involved in managing the pilot project and to support an effective delivery of it.

Anonymised data will not be shared or disclosed to any other organisation without the consent of BCC, unless the law permits or places an obligation on the BCC to do so.

The anonymised data is held and stored by Pitchbooking on behalf of BCC in a safe and secure manner in compliance with BCC's Records Retention and Disposal Schedule.

Secondly, an existing Pitchbooking web based platform is used to collect data on 'organised' use of facilities. A designated BCC user will provide non-personal data to process a pitch booking on this platform. This non-personal data is managed on behalf of BCC by Pitchbooking.

The lawful basis under the General Data Protection Legislation (GDPR) for the gathering of an individual's personal data in this situation is as follows:-

GDPR – Article 6 (1) (b) the processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

The pilot project will run for approximately two weeks from 3 to 17 June 2019.

If you have any queries regarding the processing of your personal data, please contact the Belfast City Council's community safety team on 02890 270469, or email envhealth@belfastcity.gov.uk.

If you wish to contact the Council's Data Protection Officer, please write to Belfast City Council, City Hall Belfast, BT1 5GS or send an email to records@belfastcity.gov.uk

Link to Belfast City Council corporate privacy policy: <http://www.belfastcity.gov.uk/about/Privacy.aspx>

Link to Pitchbooking's corporate privacy policy - <https://pitchbooking.com/blog/privacy-policy>