

Privacy Notice CCTV

This privacy notice is designed to help you understand how and why we use CCTV.

Film footage of individuals is classed as personal data where an individual can be directly or indirectly identified.

Why do you need to process my image and how will you use it?

We currently use CCTV cameras on all our vehicles for the purposes of health and safety of employees and members of the public and for the investigation of accidents and incidents.

[We also use CCTV to view and record individuals on and around our premises to prevent and/or detect crime, to monitor the health, safety and security of our employees/contractors/workers as well as members of the public].

We currently use CCTV **[around our premises and]** on our vehicles as outlined below. We believe that such use is necessary for legitimate business purposes, including:

- a) to prevent crime and protect vehicles from damage, disruption, vandalism and/or any other crime;
- b) for the personal safety of staff and/or other members of the public and/or to act as a deterrent against crime;
- c) to support law enforcement bodies in the prevention, detection and/or prosecution of crime;
- d) to assist in day-to-day management, including ensuring the health and safety of staff and others;
- e) to assist in accident investigation. This will include near miss reporting that will help prevent occurrence of further accidents;
- f) to assist in the investigation of insurance claims by third parties;
- g) to assist in the identification of dangerous activities which includes but is not limited to driving which falls below the reasonable standard expected of our drivers;
- h) to assist in the defence of any civil litigation, including employment tribunal proceedings

This list is not exhaustive and other purposes may be or become relevant.

We use CCTV for the purposes set out above and decisions on how footage will be used are made on a case by case basis.

We do not perform any covert surveillance, covert surveillance is that carried out in a manner calculated to ensure that subjects of it are unaware it is, or may be taking place.

All buildings and vehicles where CCTV is fitted will display awareness signs.

Who will have access to the Information?

Any **[live feeds from cameras and]** recorded images will only be viewed by approved members of staff whose role requires them to have access to such data. This may include [Plant, Transport, Fleet or Site Managers]

Our CCTV is managed by Spillard Safety System Limited of Limited of Solutions House, Station Road, Four Ashes, Wolverhampton, WV10 7DB (**Spillard Safety System Limited**).

Recorded images will only be viewed on our Spillard Safety System Limited's secure website.

How long will you keep hold of my information?

CCTV footage we use on our vehicles is stored on Spillard Safety System Limited's secure servers which are located at [DETAILS].

Data from CCTV cameras will not be retained indefinitely but will be permanently deleted once there is no reason to retain the recorded information. Exactly how long images will be retained for will vary according to the purpose for which they are being recorded. For example, where images are being recorded for crime prevention purposes, data will be kept long enough only for incidents to come to light. In all other cases, recorded images will be kept for no longer than **[90 days]** or where there is an incident or police matter recorded images maybe kept for up to 6 years of the date of the incident.

Footage that has been downloaded from the servers is reviewed at least annually, to determine whether it is still required to meet the intended purpose. We cannot determine how long the Police would retain any footage given to them for crime prevention purposes.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.

To withdraw your consent, please contact **[DATA PROTECTION OFFICER]** at **[CONTACT DETAILS]**. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Data protection officer

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions and/or complaints about this privacy notice or how we handle your personal information, please contact the DPO. Alternatively it is your right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

We encourage people to bring to our attention any instances where they think our collection, or use of, information is unfair, misleading or inappropriate.

If you have any questions about this privacy notice, please contact [POSITION AND CONTACT DETAILS].

Date of Privacy Notice :