

CCTV Privacy Notice

Introduction

This privacy notice explains how Lloyds Coaches uses your data when captured on CCTV.

Lloyds Coaches has CCTV in operation across its fleet of vehicles, and at various sites, including depots and other premises. CCTV will capture images in real time wherever the cameras are pointed. These cameras may capture footage of you whilst you are on the vehicle or premises. There are signs in place to inform you where cameras are in use.

In addition, vehicles have dashboard cameras which may capture footage of pedestrians and other vehicles while in use. All of these vehicles have stickers on them to indicate that they are equipped with cameras.

Vehicles are also fitted with video and AI telematics, capturing images only of the driver's cab (a privacy policy and statement relating specifically to this is available to drivers).

Who will be using your data?

Lloyds Coaches will be the data controller for the data you provide to us.

We may also contract third party organisations to process your data on our behalf.

What personal data do we use?

- static and moving images of people
- vehicle registration numbers

What types of special category personal data do we use?

We do not deliberately set out to capture any special category personal data. However, cameras may incidentally record information which falls within these categories. Additionally, footage cameras may be used as evidence regarding criminal offences or related security measures.

Why do we use your data?

- to ensure the health and safety of employees, service users and visitors to the sites

- to detect, prevent or reduce the incidence of crime
- to prevent and respond effectively to all forms of possible harassment and disorder
- to reduce the fear of crime
- to create a safer environment
- to provide emergency services assistance
- to assist with health and safety and other serious occurrences, including employment issues, for example, disciplinary investigations, where appropriate to do so
- for the defence of the company or its employees with regards to legal or insurance claims
- To promote safe and fuel efficient driving (AI telematics)

What legal reasons allow us to use your data in this way?

Our legal basis for processing your personal data is:

- that it is necessary to meet a legal obligation
- that it is necessary to perform tasks in the public interest
- that we have a legitimate interest in processing this information

Our basis for processing special category persona data is:

- there is a substantial public interest in processing this information, for the purposes of detecting and preventing crime

Who may we share your data with or receive it from?

Sometimes we need to share your information with others. We will only do this when it is necessary, or if we are required to do so by law. We do not plan to share it with anyone else or use it for anything else. When it is necessary, we may disclose footage to specific partners.

We may be asked to provide footage to assist the police with any criminal damage or their investigations. We may also be asked for footage from insurance companies should there be an incident involving car accidents or damage to cars parked on council premises.

We may share data with the Authorities to whom we are contracted (local authorities, Transport for Wales, etc) in the course of fulfilling our contractual responsibilities to deliver contracted services.

However, there is no planned regular or scheduled sharing of CCTV footage with any external organisation. Should this situation change, this privacy notice will be updated and reissued,

to keep you fully aware of how Lloyds Coaches plans to use CCTV footage which you may be captured in.

CCTV footage will only be processed internally by Lloyds Coaches staff who are authorised to do so and any other departments where there is a legitimate and lawful reason for their involvement, such as HR colleagues in the event of an investigation.

From time to time CCTV on entry points to company premises may be used for monitoring purposes, to see if there are any issues with security or access. At no time will individuals be the focus of this monitoring.

May personal data be transferred overseas?

Lloyds Coaches will not transfer any personal data overseas.

How long is your data kept for?

This information is held in accordance with the ICO guidance: typically 31 days.

In instances where footage is being used for an internal or external investigation, for insurance claims etc. retention will be for the duration and will be stored separately.

Does the service make decisions using fully automated processes?

No.

What rights do you have over this use of your data?

- to be informed about how we use your data
- to access a copy of your data that we process
- to have us rectify or correct your data that we process
- to restrict our processing of your personal data
- to object to the use of your data
- to have your personal data erased
- to request that we transfer your information to you or another organisation
- to object to fully automated decision making
- to withdraw your consent (if it is the legal reason why we use your data)

Contact Us

If you have any concerns about how Lloyds Coaches is using your data, you can contact us:

info@lloydscoaches.com

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Please see the Lloyds Coaches Privacy Policy for further information.

Contact details of the Information Commissioners' Office

If you are unhappy with how your data has been processed by the council or you feel your data protection rights have been breached, you have the right to complain to the Information Commissioner's Office at: