

# CCTV Privacy Notice

## D&D London - CCTV

### **1. What is the purpose of this Privacy Notice?**

Your 'personal data' or 'personal information' is any piece of information that would allow us to identify you as an individual. The processing of personal data is governed by the EU General Data Protection Regulation (the "GDPR") and national laws that supplement the GDPR in each European Economic Area (EEA) country.

We take your privacy very seriously, and this document sets out what personal information we collect from you, how we intend to use it and what your rights in respect of that information are.

### **2. Who controls your personal information, and how do you get in touch?**

The controller of your personal information is **D&D London Ltd** ("we", "us", "our"). Should you have any query in respect of your personal information, you can contact us at the following:

<b>Data controller</b>	<b>D&amp;D London Ltd</b>
Website	<a href="https://www.danddlondon.com">https://www.danddlondon.com</a>
Address	16 Kirby Street, London EC1N 8TS, United Kingdom
Telephone	<a href="tel:02077160716">020 7716 0716</a>
Email	<a href="mailto:datacontroller@danddlondon.com">datacontroller@danddlondon.com</a>

You also have the right to lodge a complaint with our supervisory authority, the **Information Commissioner's Office**, which can be contacted at the following:

<b>Supervisory Authority</b>	<b>UK Information Commissioner</b>
Website	<a href="https://ico.org.uk/concerns/">https://ico.org.uk/concerns/</a>
Address	Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, United Kingdom
Telephone	<a href="tel:03031231113">0303 123 1113</a>
Email	<a href="https://ico.org.uk/global/contact-us/email/">https://ico.org.uk/global/contact-us/email/</a>

### **3. What information do we collect about you?**

We record and store CCTV footage in and around our restaurants, for the purpose of ensuring your safety and that of our other guests and our staff, as well as to detect and prevent crime.

Our security staff may also wear body cameras, which may record footage in which you appear.

You may be personally identified on such footage for the duration of your visit to our premises (for example, your face may be visible on stored footage).

#### **4. How do we collect your personal information?**

Your personal information is collected automatically by the operation of our network of security cameras.

#### **5. What is our legal basis for collecting and using your personal information?**

We will use your personal information in the following ways and for the following purposes:

<b>Your information</b>	<b>Purpose</b>	<b>Legal basis</b>
Your face and other identifying features in the video footage we record	Protecting your safety and that of our staff and other guests, as well as detecting and preventing crime	It is in our legitimate interest to collect this information for the purpose of ensuring safety on our premises, without impacting your privacy disproportionately.

#### **6. What if you do not want to provide your personal information?**

We need to collect CCTV footage for security purposes. Should you express the wish to not appear on CCTV footage, we will need to deny you access to our restaurants.

#### **7. How is your personal information protected?**

We maintain strong physical, electronic and procedural safeguards to protect the confidentiality, integrity and availability of your personal information. We have taken appropriate security measures against illegal and/or unauthorised access to your personal information, and against the accidental loss of, or damage to, it.

#### **8. Do we share your personal information with anyone?**

Our CCTV solution provider and external CCTV monitoring company will have access to your personal information to provide services to us.

Employees of our physical security provider may also use body worn surveillance cameras. This is conducted by staff licensed by the Security Industry Authority (SIA) and conducted in line with their code of practice. The company that provides this service is Profile Protection and their data privacy notice can be found here: [www.profileprotection.co.uk](http://www.profileprotection.co.uk)

We may also need to share your personal information with the following in limited circumstances:

- IT security providers;
- Insurers;
- External advisors (for example solicitors or auditors); and
- Public authorities or law enforcement.

Any time we provide access to your personal information to someone else, we will ensure that it is adequately secured to protect your privacy.

### **10. How long do we keep your personal information?**

The CCTV and body cam footage will be retained for a period of 30 days from the date it is recorded. We need to retain this footage in case we have to refer to it at a later date (for example, to investigate a crime that occurred on our premises).

All CCTV operations are conducted in line with the recommendations from the Information Commissioner's Office (ICO) in its CCTV code of practice, and in compliance with the Protection of Freedoms Act 2012.

We may sometimes need to keep a copy of your personal information for a longer period, for example in the event of an incident, to investigate a data breach or to comply with legal requirements. We will never keep your personal information for longer than necessary.

In all cases, your personal information will be securely destroyed once the retention periods described above expire.

### **11. What are your rights in respect of your personal information?**

You have rights in respect of the personal information we hold on you, including the right to ask us to:

- **inform** you on how we collect and use it (this Privacy Notice is designed to do that); and
- provide you with a **copy** of any information we hold on you.

You have the right to **object to our use of your personal information for the purposes described above** at any time. However, that right is not absolute.

Should you want to exercise any of those rights, please contact us using the details set out in Section 2 above.

If you ask us to access the CCTV footage, and other people or number plates appear on the same footage, the requested footage will be subject to a blurring process to ensure the privacy of others who are identifiable on it. In the event we are unable to blur the footage in order to protect the privacy of others, we may refuse to grant you access to the footage.

### **12. Will we do anything else with your information in the future?**

We may use your image for the prevention of crime within all our restaurants and use this for our staff to be able to identify you if we do not wish to allow you access to our restaurants.

### **13. Changes to this Privacy Notice**

We may need to make changes to this Privacy Notice in the future (for example, to comply with new legal requirements).

Where that is the case, we will provide you with a revised Privacy Notice, which you will be able to access in the same way you accessed this version.

*\*This Privacy Notice was last updated on [23<sup>rd</sup> May 2018]*