



# **ARTICLE 13 PRIVACY NOTICE**

## **Data Protection Act 2018/General Data Protection Regulations UK (GDPR UK)**

### **RFFS DASH & VEHICLE CAM PRIVACY NOTICE**

London Biggin Hill Airport Fire and Rescue Service (RFFS) is committed to protecting your personal data. This privacy notice sets out the use of on-board capture devices in our service vehicles and its effects on you. This Privacy Notice relates to Employees and others.

### **THE PERSONAL INFORMATION WE COLLECT**

We currently collect and process the following information: -

Video Footage

### **WHY ARE WE COLLECTING YOUR DATA**

The aim of the dash and vehicle cam is to safeguard and assist in the safety of persons and property, to inform health & safety event investigations. They may also be used in defence of legal claims and to learn lessons from incidents which can then be incorporated in to driver training.

Footage of individuals recorded by dash cam constitute personal data as it allows for identification of an individual.

Footage will be collected by the Dash & Vehicle Cams when in activation of the ignition or when the sensor is activated on the vehicle. The Dash & Vehicle Cams automatically power on and off with the vehicle engine, loop records and motion detection functions. It has a built-in collision sensor which locks recording. The output video shows date/time/location via GPS, vehicle speed and G-force.

Under the General Data Protection Regulation UK (GDPR), the lawful basis we rely on for processing this information is: -

Processing is necessary for the purposes of Legitimate Interest pursued by London Biggin Hill Airport the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of you the data subject which require protection of personal data.

### **HOW THE INFORMATION WILL BE USED**

Footage will be accessed to enable evidence to be captured and used where appropriate to assist with: -

- Prosecution of offenders under any criminal act
- Outcome of any Health & Safety event or Fire Investigation
- Debrief Process of operational incidents
- Training of drivers
- Management of motor insurance claims
- Outcome of any complaint or concern that is generated

Footage cannot be viewed remotely in real time. Footage will not be viewed until requested by an authorized person for a legitimate reason.

Data will not be tampered with, data when retrieved will follow a strict retrieval procedure and be retained securely. The footage would be retrieved from the start of the incident to the end of the incident and no other footage would be scrutinized.

The Head of Fire & Emergency Planning is responsible for retaining dash cam footage and ensuring its use and security in accordance with the Dash & Vehicle Privacy Notice.

Data will not be altered in any way, in case required for evidence.

### **WHERE DATA WILL BE STORED**

Our Scania Fire Trucks data is stored on a hard drive in the vehicle. The hard drive is within a locked cabinet and the key to the cabinet is only accessible to the Head of Fire & Emergency Planning.

Dash Cam data is stored on ST cards within the vehicles, ST cards have a tamper seal and the seals form part of the daily vehicle checks.

### **DATA SHARING & ACCESS TO YOUR DATA**

Footage will only be shared in the event of an incident. We may share footage with: -

- Health & Safety Department
- Health & Safety Investigation Teams
- Asset Management
- Risk & Audit
- Legal Services (internal & external)
- Management
- Driver Training
- Statutory bodies such as Police, HSE etc
- Those imaged within the footage

In the event of any data being retrieved, the retrieval process must be followed. Requests for data retrieval can be made via the Head of Fire & Emergency Planning at [mick.obrien@bigginhillairport.com](mailto:mick.obrien@bigginhillairport.com) or alternatively via the contact details at the bottom of this notice.

If requested by Law Enforcement authority, they must demonstrate to London Biggin Hill Airport that the data is necessary for the investigation or prosecution of a criminal offence.

In certain circumstances data may be requested in the event of an accident for civil or criminal liability reasons and can be requested by a third party submitting a Subject Access Request.

London Biggin Hill Airport must be satisfied that we have a legal basis to share the data and that any third party with which data is shared will restrict its use of the data to only what is necessary and will keep it secure and retain it no longer than is necessary.

London Biggin Hill Airport will keep a record to log when it has been necessary to retrieve and retain data.

### **DATA RETENTION**

Should the data be retrieved for the purposes listed above, then it will be retained for the duration of investigations and any legal proceedings. The length of time of retention will be on a 'case by case' basis. We retain the right to keep the data for an extended period of time should the event warrant it. If the data is retained for an extended period, then the data subjects involved will be informed of this and the reasons why.

Data Cam data not retrieved for the purposes above will be retained for 48 hours.

Scania Fire truck cameras have a 360-degree field of view, these will only be used in an accident/incident and the data will be retained for 48 hours if not retrieved for the purposes outlined above.

## **YOUR DATA SUBJECT RIGHTS**

As a data subject whose personal information we hold, you have certain rights. If you wish to exercise any of these rights, please email [datamanager@bigginhillairport.com](mailto:datamanager@bigginhillairport.com) or use the information supplied in the 'Contact Us', section below. To process your request, we may ask you to provide two valid forms of identification for verification purposes. Your rights for this particular processing activity are: -

Right of Access

Right to Rectification

Right to Restriction of Processing

Right not to be subject to a decision solely based on automated processing

Right to object

Right to erasure (Erasure under these grounds requires the right to objection to be exercised first)

Please see below a full list of data subject rights below but please remember that depending on the lawful basis for processing they may not be absolute rights. If you require further information, please do not hesitate to contact us.

## **THE RIGHT TO BE INFORMED**

As a data controller, we are obliged to provide clear and transparent information about our data processing activities. This is provided by this privacy notice and any related communications we may send you.

## **THE RIGHT OF ACCESS**

You may request a copy of the personal data we hold about you free of charge. Once we have verified your identity and, if relevant, the authority of any third-party requestor, we will provide access to the personal data we hold about you as well as the following information:

- a) The purposes of the processing
- b) The categories of personal data concerned
- c) The recipients to whom the personal data has been disclosed
- d) The retention period or envisioned retention period for that personal data
- e) When personal data has been collected from a third party, the source of the personal data

If there are exceptional circumstances that mean we can refuse to provide the information, we will explain them. If answering requests is likely to exceed one calendar month, where we require additional time or (extended by 2 calendar months), or, in the case of repetitive requests, we reserve the right to request payment (for reasonable administrative costs) before processing the request, we will inform you.<sup>1</sup>

## **THE RIGHT TO RECTIFICATION**

When you believe we hold inaccurate or incomplete personal information about you, you may exercise your right to correct or complete this data. This may be used with the right to restrict processing to make sure that incorrect/incomplete information is not processed until it is corrected.

## **THE RIGHT TO ERASURE ('THE RIGHT TO BE FORGOTTEN')**

Where no overriding legal basis or legitimate reason continues to exist for processing personal data, you may request that we delete the personal data. This includes personal data that may have been unlawfully processed. We will take all reasonable steps to ensure erasure. Erasure under these grounds requires the right to objection to be exercised first.

Due to the complex nature of Consent and legal exemption, we are not always able to fulfil deletion ("Right to be Forgotten") requests, and it is essential you understand this before accessing the service.

## **THE RIGHT TO RESTRICT PROCESSING**

You may ask us to stop processing your personal data. We will still hold the data, but will not process it any further. This right is an alternative to the right to erasure. If one of the following conditions applies, you may exercise the right to restrict processing:

- a) The accuracy of personal data is contested
- b) Processing of personal data is unlawful
- c) We no longer need personal data for processing, but the personal data is required for part of a legal process
- d) The right to object has been exercised, and processing is restricted pending a decision on the status of the processing

## **THE RIGHT TO OBJECT**

You have the right to object to our processing of your data where;

- a) Processing is based on legitimate interest
- b) Processing is for the purpose of direct marketing
- c) Processing is for the purposes of scientific or historic research; or
- d) Processing involves automated decision-making and profiling

## **THE RIGHT IN RELATION TO AUTOMATED DECISION MAKING & PROFILING**

As a data subject you have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects or similarly affects you.

## **DATA SECURITY**

To prevent unauthorised access, maintain data accuracy and ensure the correct use of information, we have in place appropriate physical, electronic and managerial procedures to safeguard and ensure your information supplied is held securely.

## **HOW TO COMPLAIN**

If you have any concerns about our use of your personal information, you can make a complaint to us at London Biggin Hill Airport: -

[datamanager@bigginhillairport.com](mailto:datamanager@bigginhillairport.com)

01959 578517

London Biggin Hill Airport EGKB

Biggin Hill, Bromley

TN16 3BH, UK

You can also complain to the ICO if you are unhappy with how we have used your data.  
Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Live chat via [ico.org.uk/live chat](https://ico.org.uk/live-chat)  
Helpline number: 0303 123 1113  
ICO website: [www.ico.org.uk](https://www.ico.org.uk)