



Our CCTV Policy

GDPR and CCTV Recording

The new General Data Protection Regulation (GDPR) came into effect on 25th May 2018. The GDPR introduces new obligations on businesses that store and process data on individuals. Data includes images captured by CCTV systems.

This policy explains what we use CCTV images for, how and where we capture them, where we store them and how long we hold them for and your rights to access and review the images we hold should you wish to.

When and where do we use CCTV?

We record CCTV across our premises at Marsh Lane, Boston, PE21 7SJ. Cameras are situated to provide full coverage of the entire site externally and internally within all operational areas inside buildings. This includes all warehouses, loading docks, collation areas, public corridors and Warehouse & Transport offices. CCTV is also used in all areas of our on-site processing facilities (e.g. Prepared Produce factory and the Butchery). CCTV recordings do not take place in private spaces such as changing rooms, the First Aid room and toilets.

CCTV images are recorded 24/7 throughout our premises.

We employ CCTV recording systems in our delivery vehicles. Images are recorded externally on all sides of the vehicle, within the vehicle load compartments and within the cab of the vehicle.

CCTV images are recorded whenever the vehicle is operating – i.e. when driving and when making deliveries.

Signage

We use 'Privacy Notices' (signs) to advise our employees, customers and members of the public that CCTV recording is taking place.

On our premises we display Privacy Notices on the external entry / exit points of our site. Privacy Notices are also displayed at the Main Reception, Warehouse & Transport reception and Butchery reception.

We also display Privacy Notices on our vehicles.

The Privacy Notices look like this:



**CCTV
in
operation**

CCTV monitoring and recording is in continuous use throughout this site

CCTV is used to support our legitimate interests in security, crime prevention and employee & public safety. We may also use CCTV to help to investigate incidents, provide evidence in the support of claims or to resolve disputes. We may use CCTV footage to support the training of our employees. For more information about this Privacy Notice and to access our CCTV policy, contact the Data Controller: Pilgrim Foodservice Ltd, Marsh Lane, Boston, Lincolnshire, PE21 7SJ.



gdpr@pilgrimfoods.co.uk



www.pilgrimfoods.co.uk



01205 312700



**CCTV
in
operation**

CCTV monitoring and recording is in continuous use in and around this vehicle

CCTV is used to support our legitimate interests in security, crime prevention and employee & public safety. We may also use CCTV to help to investigate incidents, provide evidence in the support of claims or to resolve disputes. We may use CCTV footage to support the training of our employees. For more information about this Privacy Notice and to access our CCTV policy, contact the Data Controller: Pilgrim Foodservice Ltd, Marsh Lane, Boston, Lincolnshire, PE21 7SJ.



gdpr@pilgrimfoods.co.uk



www.pilgrimfoods.co.uk



01205 312700

Why do we record CCTV images?

Under GDPR we must have a valid 'Legal Basis' for using personal data. For CCTV images, we rely upon our 'Legitimate Interest' in the images for the purposes of: security, crime prevention and employee & public safety.

We may also use the images to help to investigate incidents, provide evidence in the support of claims or to resolve disputes. Occasionally, we may use CCTV footage to support the training of our employees.

Breaches of CCTV Policy

We may use recorded CCTV images to support our investigations into incidents where we suspect company procedures, policies or rules have been breached. In cases where an allegation is supported by CCTV evidence, the CCTV recordings will also be used to support any subsequent disciplinary procedures.

CCTV recordings may also be supplied to law enforcement agencies to support investigations into alleged crime.

Where do we store the CCTV images?

We store CCTV recordings securely on our premises. The images are digitised and stored on computer hardware. A copy of relevant footage may be made to support investigations, claims or if a dispute has been raised. Copies are made using computer exchangeable media (e.g. flash drives using computer files).

How long do we store the CCTV images?

CCTV recordings made on our premises are retained for up to one year.

CCTV recordings made on our vehicles are retained for up to 6 months.

In circumstances where there is an ongoing investigation or dispute, copies of images will be retained until the investigation is completed or the dispute is settled.

Who can view the images?

A limited number of authorised managers have general access to the on-site CCTV recordings, including: The Site Safety and Compliance Manager, company directors and members of the IT support team.

CCTV recordings can be viewed by Pilgrim line managers having a reasonable need to do so – e.g. as part of an incident investigation.

In the site reception areas (Main Reception, Warehouse, Transport and Butchery) and within the main offices, CCTV images of the main site entrances are continuously monitored to enable the site gates to be viewed for the purpose of controlling access to the site by visitors (e.g. customers, supplier vehicles, contractors and members of the public). Key operational areas of the site (e.g. warehouses, loading docks, yard areas) are also displayed on these monitors. This monitoring is performed in the interest of health and safety and to facilitate operational management.

The company employs the services of GBSG Ltd. - an external security monitoring company. GBSG monitor the site CCTV images remotely 24 hours a day, 7 days a week.

The drivers of our vehicles can view the CCTV images in real-time. They can view recorded images if necessary.

Who do we share CCTV images with?

We may share CCTV images recorded on our premises or in and around our vehicles with the following individuals and organisations:

- Selected employees - typically line managers, who have a legitimate interest in accessing them e.g. to support investigations.
- Our external security providers – GBSG Ltd.
- Our insurers, Hendersons LLP, who may require CCTV recordings to support a claim.
- Authorised public authorities and enforcement agencies – e.g. the Courts, The Police – in support of a hearing or to support the investigation into alleged crime.

Is CCTV data transferred outside EU/EEA?

No. CCTV data is not transferred outside the EU or EEA.

Automated decision making and profiling

The GDPR is concerned with systems that use data to make decisions about individuals or profile individuals without human intervention. If these systems are used, special provisions apply. We do not use automated decision making or profiling in relation to CCTV recordings.

Your rights

The GDPR provides the following rights for individuals:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure (not applicable where it is necessary for us to use the data for a lawful reason)
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling.

If you wish to exercise any of the rights set out above, please contact us. Some of these rights may be limited depending on the lawful basis for which the data is processed.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

You have the right to access the data we hold about you by submitting a “Subject Access Request”. Details of how to do this are included in the next section.

You have the right to object to us using your personal data, however this may affect our ability to fulfil our contract with you. If you object, we will make you aware of the implications of doing so.

We aim to respond to all legitimate requests within one month.

Who to contact if you have a query

If you have a query, if you wish to object to us using your personal data, if you wish to make a complaint about how we have handled your personal data, or if you wish to make a Subject Access Request, you can contact the company by emailing: gdpr@pilgrimfoods.co.uk

If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law, you can complain to the Information Commissioner’s Office (ICO). The ICO is the UK supervisory authority for data protection issues.

Pilgrim Foodservice Ltd. is the “Controller” of your personal data. Our business address is: Marsh Lane, Boston, PE21 7SJ. You may write to us at this address.

Review of this privacy policy and your duty to inform us of changes

We keep this Policy under regular review. This Policy was last updated in May 2018.

We may change this Policy from time to time. If so, we will notify you by email or website update or otherwise.