

The Blue Lion Privacy Notice

Our contact details

Name: Megan Banks, Jonathan White

Address: The Blue Lion, Cwm, Dyserth, LL185SG

Phone Number: 01745346188 / 07843137292

E-mail: info@bluelion.wales

The type of personal information we collect

We currently collect and process the following information:

- We have 24hour CCTV recording in public places both inside and outside of our property
- The AI places marker events when detecting humans and vehicles for ease of review
- There is no further personal information gathered or recorded, we make no use of ANPR or facial recognition and sound is not recorded.
- The CCTV footage may be accessed, by us, at any time, but is not routinely monitored except in the event where problems have arisen.
- The cameras have been sited **not** to provide view of properties outside of the business premises.
- Staff details such as email address, contact number, house address, emergency contact number and emergency address

How we get the personal information and why we have it

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- Staff personal information and emergency contacts

We also receive personal information indirectly, from the following sources in the following scenarios:

- CCTV video images

We use the information that you have given us in order to

- Maintain security and customer safety within the confines of the Blue Lion perimeter.

- Ensure efficient working practices and develop a good customer experience.
- Staff information for payroll and in-case of emergencies

We may share this information with:

- North Wales Police Force or equivalent entity. We retain the right to refuse such requests without the production of a warrant. However, in such circumstances the data requested will be extracted and held until such can be produced.
- Our insurance provider (in the event of a claim) or approved investigator. Details of our insurer can be provided upon written request
- Our Accountants (currently Premier Taxation)

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

(a) Your consent. You are able to remove your consent at any time. You can do this by contacting Megan Banks or Jonathan White

Your personal details will only be used in confidence and only used for payroll and emergencies or incidents.

(b) We have a contractual obligation.

- We value our employees and customers alike.
- We will not use CCTV to spy on our employees, but footage may be used as part of our appraisal process. Such footage will not be shared without approval except for reasons outlined below.
- To safeguard customers' welfare
- To carry out or cooperate with any internal or external complaints, disciplinary or investigation process; and
- Where otherwise reasonably necessary for legitimate purposes, including to obtain appropriate professional advice and insurance for the business.

(c) We have a legal obligation.

- We reserve the right to monitor CCTV in order to establish the existence of facts
- ascertain compliance with regulatory or self-regulatory procedures

- monitor standards which are achieved by persons using the system in the course of their duties and for staff training purposes
- prevent or detect crime
- investigate or detect unauthorised use of the premises.

Specific examples include:

- To fulfil our obligations to you as an employer we will need to share your information with medical professionals, such as occupational health services, where we are making a referral.
- Occasionally we may use consultants, experts and other advisors (including legal advisors and accountants) to assist us in fulfilling our obligations and to help run the business properly. We will share your information with them if this is relevant to the work they carry out.
- In accordance with our legal obligations, we will share information with the relevant regulatory or inspectorate bodies.
- As an employer we must check if you can work in the UK before we employ you.
- We may share some of your information with our insurance company, for example, where there is a serious incident occurs
- We may share your information with benefits providers, for example, to ensure that you are able to take advantage of the benefit.
- We may need to share information about you with the Health and Safety Executive (a government organisation) if there is a health and safety issue.
- If we are dealing with a complaint or grievance (e.g. from a customer or a colleague), we will need to share your information with other parties if it is relevant, for example, the appropriate staff or the colleague.
- We will share personal information about staff with the relevant statutory agencies if it is appropriate to share this information to investigate allegations of misconduct
- On occasion, we may need to share your information with the Police for the prevention and investigation of crime

and the prosecution of offenders. We will only do this in specific circumstances to assist the police with their investigations. In exceptional circumstances CCTV recordings may be disclosed to third parties such as the police

- We may need to share your information if there is an emergency, for example, if you are hurt in an accident.
- We sometimes use contractors to handle personal information on our behalf. The following are examples: IT consultants who might access information about you when checking the security of our IT network; and we use third party "cloud computing" services to store some information rather than the information being stored on hard drives located on the site.

(d) We have a legitimate interest.

The business expects that the following uses will fall within that category of its (or its community's) "legitimate interests":

Staff Records

Customer Contact Details

Data Checks

- To enable relevant authorities to monitor our performance and to intervene or assist with incidents as appropriate;
- To give and receive information and references about past, current and prospective employees
- To safeguard customers' and employees' welfare and provide appropriate support;
- To monitor (as appropriate) use of the business IT and communications systems;
- To make use of photographic images and videos in promotional publications, on the business website and (where appropriate) on the business' social media channels
- For security purposes, including CCTV
- To carry out or cooperate with any internal or external complaints, disciplinary or investigation process; and

- Where otherwise reasonably necessary for business purposes, including to obtain appropriate professional advice and insurance for the business.

How we store your personal information

Your information is securely stored.

We keep employee personal data for 6 years, customer personal data for 3 years. We will then dispose your information by deleting the data electronically and deleting any back up data. We will dispose of any paper information by shredding it.

CCTV is continuously recording 24 hours and is overwritten within 28 days. Except in the use of footage or images used for promotional purposes outlined above, where footage or images is extracted it will be kept on a password protected device kept in a secure location (usually the safe) until it has served its legitimate purpose, or 1 year, whichever is shorter.

Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at info@bluelion.wales, 01745346188, The Blue Lion, Dyserth, Cwm, LL185SG if you wish to make a request.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at info@bluelion.wales, 01745346188, The Blue Lion, Dyserth, Cwm, LL185SG.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>