

## Closed-circuit television (CCTV) privacy notice

We're committed to protecting your personal data and ensuring that it is processed fairly and lawfully. Information you provide to us will be processed in accordance with the General Data Protection Regulation (GDPR), the Data Protection Act 2018 and subsequent legislation.

### Information we collect

The data that we process is footage showing employees, patients, customers and members of the public which is captured by our CCTV cameras and stored on our systems.

Some more sensitive information, known as special category data, may also be processed passively if the footage collected reveals an individual's ethnic or racial origin, or data concerning their health.

Where there is a security incident, some criminal offence data may also be processed.

### Processing personal data

The information collected will be only be processed for one or more of the following purposes:

- protecting the health and safety of employees and visitors to sites
- preventing and detecting crime or criminal activity, and protecting our buildings and assets from damage, disruption, vandalism or other criminal activity
- creating a safer environment and providing reassurance to employees and the general public
- assisting with investigations, where appropriate
- assisting in the effective resolution of any disputes
- ensuring business continuity and safe service levels are maintained

It will not be processed for any other purpose. The legal basis for processing is:

- GDPR article 6(1)(e): processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Where special category data is processed, the legal basis is:

- article 9(2)(g): processing is necessary for reasons of substantial public interest.

The relevant basis in UK law is set out in section 10(3) of the DPA 2018. This means that we're required to meet one of the 23 specific substantial public interest conditions set out in Schedule 1. The substantial public interest condition is one or more of the following:

- Sch 1 para 7: Administration of justice
- Sch 1 para 10: Preventing or detecting unlawful acts
- Sch 1 para 11: Protecting the public
- Sch 1 para 20: Insurance

Where personal data relating to criminal allegations or offences is processed, this will be carried out only where authorised under UK law in compliance with GDPR Article 10 and will meet one or more of the following conditions set out Schedule 1, Part 3 of the Data Protection Act 2018:

- Sch 1 para 33: Legal Claims
- Sch 1 para 36: Substantial Public Interest
- Sch 1 para 37: Insurance Claims

### **Access to data**

There is no planned regular or scheduled sharing of CCTV footage with any external organisation. However, in the event of a security incident or suspected security incident, footage may be shared with third party organisations such as the police or insurance companies.

Footage may be shared with an individual in response to a subject access request. Where a subject access request is made, efforts will be made to seek the consent to disclosure of images of any other individuals captured in the footage, and where this is not possible, consideration will be given as to whether or not it is reasonable to share the information without their consent.

The information provided will not be used for marketing purposes.

### **Data security**

All images captured on our cameras, re-transmitted to and recorded on hardware hosted within our infrastructure (either at the pharmacy location or remotely by our head office) as a result, will be subject to appropriate security protocols.

We're committed to protecting personal data and have [policies and procedures on information security](#) in place to ensure that it is safeguarded.

### **Data retention**

The information provided will be kept for up to 45 days before being deleted (this time frame may be shorter depending on the amount of new data being recorded).

Some images may be saved for longer periods if required to aid with investigations or complaints. This data is stored securely and only accessible by Head Office.

### **Your rights**

Should you wish to raise any concerns about how we have processed your personal data you can contact the data protection officer, please email [mail@rushmerepharmacy.co.uk](mailto:mail@rushmerepharmacy.co.uk) or write to:

Data Protection Officer  
J R Barbour Pharmacies Ltd  
PO Box 1452  
Peterborough  
PE2 2WA

You also have the right to contact the [Information Commissioner](#).