

## **PRIVACY NOTICE – CCTV**

### **1. SCOPE**

This notice applies to all CCTV systems operated by the College, including cameras that process biometric data through facial recognition technology.

If you attend, visit or work at York College we may record moving images of you as you enter and move about the College. CCTV covers some interiors and exteriors of buildings across the College site.

### **2. PURPOSE**

2.1. The College uses CCTV to:

- Maintain a safe and secure environment for staff, students and visitors.
- Reduce the risk of vandalism.
- Support the prevention and detection of crime.

The College is registered with the Information Commissioner's Office (ICO) for this purpose.

### **3. BIOMETRIC DATA COLLECTION**

3.1. York College uses facial recognition technology at specific access points only. Biometric data is collected by cameras located at:

- Main atrium entrance
- Staff entrance
- Construction entrance

All other CCTV cameras across the campus, do **not** collect biometric data.

Facial recognition involves processing biometric data, which is classified as special category data under UK GDPR. Biometric data must be collected for specified, explicit and legitimate purposes. The College ensures that the purpose for processing this data is clearly defined, and it will not be used for purposes that are incompatible with the original purpose without obtaining explicit consent or a legal basis.

### **4. LAWFUL BASIS**

4.1. Standard CCTV footage: Legitimate interests in ensuring the security of the premises and the safety of individuals.

Biometric data: Substantial public interest for crime prevention and safeguarding.

## **5. DATA RETENTION**

- We keep information recorded on CCTV for 30 days, where the IT system can accommodate the volume of data stored, after which it is deleted. Where recordings are requested or required to provide evidence of incidents, the relevant section of recording will be downloaded and stored securely on college servers. These recordings will be kept in line with the College's records retention guidelines.
- Biometric data is securely stored, processed and retained for the minimum necessary period and securely deleted when no longer needed.

## **6. ACCESS AND SHARING**

- 6.1. Access to CCTV and biometric data is restricted to authorised personnel. Data may be shared with third parties where there is a lawful reason for their request. This may include: the police, social services, legal firms acting on your behalf, insurance companies, government/regulatory agencies or the Security Industry Authority.
- 6.2 We will not share your details with any other third party including commercial companies without your consent to do so.

## **7. HOW DO WE PROTECT YOUR DATA?**

- 7.1 We take the security of your data seriously and have internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed inappropriately.
- 7.2. Where we engage third parties to process personal data on our behalf, we do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

## **8. HOW CAN I ACCESS THE INFORMATION YOU HOLD ABOUT ME?**

- 8.1. Individuals whose information is recorded have a right to be provided with that information or to view that information. The rights of other individuals will always be taken into account.
- 8.2. You can make a request to access information held about you by emailing [dataprotection@yorkcollege.ac.uk](mailto:dataprotection@yorkcollege.ac.uk).

## **9. WHAT ARE MY RIGHTS?**

### **Subject access requests**

- 9.1 The General Data Protection Regulation (GDPR) grants you the right to access particular personal data that we hold about you.

### **Right to access**

- 9.2 You have the right to request access to the personal data we hold about you and to check that it is being processed lawfully. To help us verify your identity, we ask that you include relevant information with your request. We will respond within one calendar month from the date we receive your request.

Please note that, due to the nature of CCTV footage, it is generally not practical to send copies electronically. Instead, we will arrange for you to view the footage securely at our offices. There are some exceptions to this right; for example, we may not be able to provide all footage if doing so would adversely affect the rights and freedoms of others.

### **Right to rectification**

- 9.3 You have the right to obtain from us, without undue delay, the rectification of inaccurate personal data we hold concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

### **Right to erasure**

- 9.4 You have the right to request the deletion of your personal data where, for example, the personal data is no longer necessary for the purposes for which it was collected, where you withdraw your consent to processing, where there is no overriding legitimate interest for us to continue to process your personal data, or your personal data has been unlawfully processed or to comply with the law. Please note that these are exceptions to this right (e.g. compliance with law); if any such exception applies we will inform you when you make your request to us.

### **Right to object**

- 9.5 In certain circumstances, you have the right to object to the processing of your personal data where, for example, your personal data is being processed on the basis of legitimate interests (of us or a third party) or for the performance of a task in the public interest and there are no compelling overriding legitimate grounds for us to continue to process your personal data.

You also have a separate right to object to the processing of your personal data for direct marketing.

### **Right to restriction of processing**

- 9.6 In certain circumstances, you have the right to request that we restrict the further processing of your personal data. This right arises where, for example, you have contested the accuracy of the personal data we hold about you and we are verifying the information, you have objected to processing (see above, right to object) and we are considering whether there are any overriding legitimate interests, or the processing is unlawful and you elect that processing is restricted rather than deleted or we no longer need the personal data for the purposes of processing, but you require the data in connection with legal claims.

### **Notification obligation regarding rectification or erasure of personal data or restriction of processing**

- 9.7 We shall communicate any rectification or erasure of personal data or restriction of processing as described above to each recipient to whom the personal data has been disclosed unless this proves impossible or involves disproportionate effort. We shall provide you with information about those recipients if you request it.

### **Right to data portability**

- 9.8 You have the right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit this data to another controller, without hindrance from us.

### **Right to not be subject to decisions based solely on automated processing**

- 9.9 We do not carry out any automated processing leading to an automated decision based on your personal data.

### **Accuracy of information**

- 9.10 In order to provide the highest level of customer service possible, we need to keep accurate personal data about you. We take reasonable steps to ensure that accuracy of any personal data or sensitive information we obtain. We ensure that the source of any personal data or sensitive information is clear, and we carefully consider any challenges to the accuracy of the information. We also consider when it is necessary to update the information, such as name or address changes and you can help us by informing us of these changes when they occur.

## **10. WHAT WE MAY NEED FROM YOU**

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. We may also contact you to ask you for further information in relation to your request to speed up our response.

## **11. WHO CAN I CONTACT IF I HAVE ANY QUESTIONS OR CONCERNS?**

- 11.1. If you have any questions or queries which are not answered by this Privacy Notice or have any potential concerns about how we may use the personal data we hold, please write to the Data Protection Officer at York College, Sim Balk Lane, Bishopthorpe, York, YO23 2BB or email [dataprotection@yorkcollege.ac.uk](mailto:dataprotection@yorkcollege.ac.uk).

11.2. If you have a complaint and it is not resolved to your satisfaction and you wish to make a formal complaint to the Information Commissioner's Office (ICO), you can contact them on 0303 123 1113 or contact them via [live chat](#) on their website. You also have the right to judicial remedy against a legally binding decision of the ICO where you consider that your rights under this regulation have been infringed as a result of the processing of your personal data. You have the right to appoint a third party to lodge the complaint on your behalf and exercise your right to seek compensation.

## **12. PRIVACY NOTICE CHANGES**

12.1. This Privacy Notice is regularly reviewed. This is to make sure that we continue to meet the highest standards and to protect your privacy. We reserve the right at all times, to update, modify or amend this Notice. We suggest that you review this Privacy Notice from time to time to ensure you are aware of any changes we may have made, however, we will not significantly change how we use information you have already given to us without your prior agreement. The latest version of this Notice can be found on the College's website.