

Privacy Notice

Vehicle Dash Cams

Ian Williams are committed to compliance with all relevant legislation in respect of personal data and the protection of the “rights and freedoms” of individuals whose information Ian Williams’ collects and processes in accordance with UK General Data Protection Regulation and the Data Protection Act.

We are providing this privacy notice to help members of the public understand the use of dash cams in our vehicles and its effects on them.

What data is collected?

External and internal dashboard cameras are installed in our Vans, these are small devices that will record video footage of the road and the interior of our vans.

The Dash Cams record outward facing footage e.g. the road and area surrounding the front of a van. It will also record inward facing footage i.e. the interior (cab) of the van, recording both driver and passengers.

Recording will take place both when the vehicle is in motion and when it is parked with the ignition on. 36 hours of active footage will be recorded and stored on the device at any time, footage that is more than 36 hours old will be overwritten. This means in practical terms, taking into consideration the driving and idle times of an Ian Williams vehicle, that footage will be accessible for approximately 9 working days after recording before it will be overwritten and deleted. Collision events will automatically upload footage. User and driver requests will upload (for footage within the 36 hour storage window). This data will be stored in a separate secure UK location. Only 1 minute of footage can be uploaded at any time.

No audio is recorded.

Why are we collecting this data?

The aim of the vehicle dash cam is to safeguard and assist in the safety of persons and property and to inform incident/accident investigations.

Footage will also be used in defence of legal claims.

The specific benefits of using dash cams include:

- Management of vehicle safety; where an incident occurs, footage can quickly help us to learn lessons in driving behaviours and enable us to implement driver training.
- Reduced risk of injury to employees and members of the public as vehicle accidents are reduced as a result of improved driver behaviours.
- Assisting vehicle accident and incident investigations, providing a complete picture to help with post incident analysis.
- A reduction in costs as a result of reduced vehicle damage, reduced insurance claims (and subsequently lower premiums), which can be re-invested in the business.

Under the General Data Protection Regulation UK (GDPR), the lawful basis we rely on for processing this information is that processing is necessary for the purposes of Legitimate Interest pursuant to Ian Williams Limited except where such interests are overridden by the interests or fundamental rights and freedoms of data subjects.

How will the footage be used?

Data will be accessed in the following circumstances:

- to investigate events of a concerning nature, for example an accident or any other incident resulting in damage to our vehicle, or other road users' vehicles, or any property.
- to investigate poor driving standards.
- to investigate allegations or complaints about an employee's driving or conduct.
- to handle a specific query or allegation where the footage would support us to reach an outcome.

Who will have access to your information?

At Ian Williams Limited, access to footage will be limited to a small number of senior colleagues who hold responsibility for the areas outlined above.

If requested by Law Enforcement authority, the footage may be shared providing that the data is necessary for an investigation or prosecution of a criminal offence.

In certain circumstances data may be requested and/or shared with other third parties, for example for civil or criminal liability reasons, insurance investigations etc.; including in defence of any claims against Ian Williams Limited.

Before sharing the data with any third party we will 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.

How is your information stored?

Footage is stored as follows:

- 36 hours of footage is stored on the camera itself.
- In the event of a collision event, or at user and driver request, footage will be uploaded to a UK based server. Each recording will be 1 minute long.
- The UK based servers will contain all the footage captured.

Any recording uploaded will be kept for 6 months in total because some accident / investigations can take some time to be reported after they occur. The footage is automatically deleted from the servers after 6 months of being recorded.

Where footage is accessed for the purposes outlined in this privacy notice, it will be downloaded from the server to our own internal IT systems and kept for as long as it is required to support an investigation or defend a claim. 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.

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

Your rights

As an individual ('Data Subject'), you have the right to:

- ask for a copy of your information ("Subject Access Request"),
- ask us to update incorrect or incomplete information,
- ask us to delete or stop processing your data, unless there is a legitimate reason to carry on processing that information,
- object to the processing of your data,
- exercise your right "to be forgotten".

Please be aware though that if you request a recording the request must be made within 7 days from the point of being recorded. After this time the recording may not exist on the camera storage and so we will be unable to provide it.

Who to contact about this privacy notice

If you have any questions about this notice, please contact a member of the Data Protection team on 01454 328000 or by:

Email: dataprotection@ianwilliams.co.uk

Address: Ian Williams Limited, Quarry Road, Chipping Sodbury, Bristol, BS37 6JL

Further information about your rights can be found on the Information Commissioner's website www.ico.org.uk

*Version 2
Issued June 2024*