

ARTICLE 13 PRIVACY NOTICE

Data Protection Act 2018/General Data Protection Regulations UK (GDPR UK)

CCTV PRIVACY NOTICE FOR VISITORS TO THE LANDING HOTEL

The Landing Hotel is collecting your personal data. When we collect personal data, we are obliged legally to provide you with certain information, it is called the "Right to be Informed". That information is contained in the below Notice. Notices around the hotel will inform you that CCTV is in operation.

WHY WE NEED IT – THE PURPOSE OF PROCESSING

The Landing Hotel uses closed circuit television (CCTV) images to provide a safe and secure environment for employees and for visitors to the hotel, such as customers, contractors, clients, suppliers etc, and to protect the hotels company property.

We are collecting and processing personal information via the CCTV systems for the following purposes:

- To assist in the prevention or detection of crime or equivalent malpractice
- To prevent and respond effectively to all forms of possible harassment and disorder
- To reduce the fear of crime
- To create a safer environment
- To provide emergency services assistance
- To assist with health and safety and other serious occurrences, including employment issues
- For security purposes and performance monitoring and measuring
- To protect the hotels property
- To ensure hotel productivity

WHAT PERSONAL DATA DO WE USE?

- Static and moving images of people
- Vehicle registration numbers

WHAT SPECIAL CATEGORY DATA DO WE USE?

We do not deliberately set out to capture any special category personal data, however cameras may incidentally record information which falls into these categories.

WHY WE ARE ALLOWED TO PROCESS YOUR PERSONAL INFORMATION IN THIS WAY – THE LAWFUL BASIS

Under the General Data Protection Regulation UK (GDPR), the lawful basis we rely on for processing this information is Legitimate Interest and processing is necessary for the purpose of legitimate interest pursued by The Landing Hotel.

LOCATION OF THE CAMERAS

Cameras are located throughout the hotel principally at the entrance and exit points. Cameras are positioned to only cover communal or public areas and they have been sited to provide clear images.

Appropriate signs are prominently displayed so that employees, visitors, customers, contractors, clients, suppliers etc are aware they are entering an area covered by CCTV.

WHO WE WILL SHARE YOUR PERSONAL INFORMATION WITH

CCTV footage may need to be shared. We will only do this when it is necessary, or if we are required to do so by law.

We do not plan to share it with anyone else or use it for anything else.

Should recorded data require extraction this will be tightly controlled and agreed by the General Manager who will scrutinise any request and ensure compliance with our CCTV policy.

WHO HAS ACCESS TO YOUR DATA?

The following have access to the images on the CCTV cameras:-

- Oak Security (supplier of CCTV and technical support as and when required);
- Duty Managers & Supervisors;
- Administrator;
- Hotel Management and front of house;

RIGHT OF ACCESS

Data subjects have the right to request a copy of personal data that The Landing Hotel holds on them, including CCTV images if they are recognisable from the image. This is known as a Data Subject Access Request.

Sometimes there may be legal reasons which prevent disclosure, such as the footage being part of a criminal investigation, or the footage contains third parties.

If you wish to access any CCTV images relating to you please contact us (details can be found at the end of this privacy notice). Alternatively a data subject access request form is available on our website.

WHERE YOUR PERSONAL INFORMATION WILL BE STORED

Images are stored in an electronic format utilising Networked Video Recorders (NVRs) to record and manage CCTV images.

Once recorded, video cannot be altered, ensuring that the audit trail is intact for evidential purposes. The NVRs will automatically manage the disk space according to the retention periods that are set.

The NVRs are located in a secure comms room which can only be entered by electronic key card by authorised personnel and a password is required for the NVR. Our servers are based within the UK and located at the hotel.

HOW LONG WE WILL KEEP YOUR PERSONAL INFORMATION FOR

CCTV data could be retained for up to 90 days.

YOUR RIGHTS AS A DATA SUBJECT

Please see below a full list of data subject rights below but please remember that depending on the legal basis for processing they may not be absolute rights. If you require further information, please do not hesitate to contact us.

Updates to this privacy notice will be available on The Landing website [Privacy Policy - The Landing \(thelandinghotel.co.uk\)](https://thelandinghotel.co.uk/privacy-policy)

THE RIGHT TO BE INFORMED

As a data controller, we are obliged to provide clear and transparent information about our data processing activities. This is provided by this privacy notice and any related communications we may send you.

THE RIGHT OF ACCESS

You may request a copy of the personal data we hold about you free of charge. Once we have verified your identity and, if relevant, the authority of any third-party requestor, we will provide access to the personal data we hold about you as well as the following information:

- a) The purposes of the processing
- b) The categories of personal data concerned
- c) The recipients to whom the personal data has been disclosed
- d) The retention period or envisioned retention period for that personal data
- e) When personal data has been collected from a third party, the source of the personal data

If there are exceptional circumstances that mean we can refuse to provide the information, we will explain them. If answering requests is likely to exceed one calendar month, where we require additional time or (extended by 2 calendar months), or, in the case of repetitive requests, we reserve the right to request payment (for reasonable administrative costs) before processing the request, we will inform you.'

THE RIGHT TO RECTIFICATION

When you believe we hold inaccurate or incomplete personal information about you, you may exercise your right to correct or complete this data. This may be used with the right to restrict processing to make sure that incorrect/incomplete information is not processed until it is corrected.

THE RIGHT TO ERASURE ('THE RIGHT TO BE FORGOTTEN')

Where no overriding legal basis or legitimate reason continues to exist for processing personal data, you may request that we delete the personal data. This includes personal data that may have been unlawfully processed. We will take all reasonable steps to ensure erasure.

Due to the complex nature of Consent and legal exemption, we are not always able to fulfil deletion ("Right to be Forgotten") requests, and it is essential you understand this before accessing the service.

THE RIGHT TO RESTRICT PROCESSING

You may ask us to stop processing your personal data. We will still hold the data, but will not process it any further. This right is an alternative to the right to erasure. If one of the following conditions applies, you may exercise the right to restrict processing:

- a) The accuracy of personal data is contested.
- b) Processing of personal data is unlawful.

- c) We no longer need personal data for processing, but the personal data is required for part of a legal process.
- d) The right to object has been exercised, and processing is restricted pending a decision on the status of the processing.

THE RIGHT TO DATA PORTABILITY

You may request your set of personal data be transferred to another controller or processor, provided in a commonly used and machine-readable format. This right is only available if the original processing was on the basis of Consent, the processing is by automated means and if the processing is based on the fulfilment of a contractual obligation.

THE RIGHT TO OBJECT

You have the right to object to our processing of your data where;

- a) Processing is based on legitimate interest (*note this is not an absolute right)
- b) Processing is for the purpose of direct marketing;
- c) Processing is for the purposes of scientific or historic research; or
- d) Processing involves automated decision-making and profiling.

HOW TO COMPLAIN

If you have any concerns about our use of your personal information, you can make a complaint to us at:-

The Landing Hotel
General Manager
Churchill Way
Biggin Hill
Westerham
TN16 3BN
01959 584750
gm@thelandinghotel.co.uk
datamanager@thelandinghotel.co.uk

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
Livechat via ico.org.uk/livechat
Helpline number: 0303 123 1113 ICO
website: www.ico.org.uk