



CCTV Privacy Notice



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1. **Introduction**

Harwich Haven Authority (The Authority) operate a surveillance camera system, for a number of purposes, across all of their properties in Harwich and Felixstowe. This privacy notice tells you how The Authority manages your personal information, in this case, static or moving images, collected via the surveillance systems as you visit our properties or the surround areas.

Protecting your personal information, as well as protecting your safety and security while you visit our properties, is of the utmost importance. We are legally obliged to use your information in line with all applicable laws concerning the protection of personal data (namely, the General Data Protection Regulation (GDPR) and Data Protection Act 2018 (DPA 2018), as well as respecting your right to privacy. In order to balance the protection of your rights with the protection of our interests, we have designed and implemented our processes in line with guidelines from the Information Commissioners Office (ICO) and the Surveillance Camera Commissioner (SCC) to ensure that we look after your information in the best way possible.

2. **What information will we collect about you?**

The surveillance system covers the offices, buildings, car parks, pier, jetties, and pontoons that The Authority manages, occupies, or owns. When you visit one of these areas, we may collect static or moving images of you.

As the surveillance system covers a wide area as well as a wide range of areas, we could collect your personal information if you are:

- An employee
- A business-related visitor
- A member of the public
- A contractor
- A stakeholder using the Harbour Master's Jetty or area around the jetty

3. **How will The Authority use the information it collects about me?**

The Authority may use surveillance system images for a number of purposes detailed below:

- Physical Security – To aid in the detection and prevention of crime and to maintain the safety and security of our buildings, public and private facilities, and the property or assets of the Authority, its employees, and visiting members of the public
- Access Control – To manage access to the private and secure areas of The Authority's buildings and facilities
- Stakeholder Engagement – to provide views of the harbour and the Ha'penny Pier pontoons to the wider stakeholder community. *IMPORTANT NOTE – The cameras in use for this purpose have been positioned and configured so they do not capture any personal data.*
- Compliance – To assist in the investigation of breaches (or suspected breaches) of The Authority's internal policies and procedures, including disciplinary procedures.

The lawful basis for The Authority collecting and using the surveillance system images is that we have a legitimate interest (GDPR Art. 6, 1(f)) to do so. In accordance with the GDPR and the codes of practice, we have carried out a Legitimate Interest Assessment (LIA) which is available upon request.

The recorded surveillance system images may only be accessed by trained employees and only with authorisation from designated persons who have passed the appropriate data privacy training - the list of designated persons is held and administered by the DCO. This is to ensure your data and your rights are handled in a safe, secure way.

Monitoring live footage

The Vessel Traffic Service (VTS) team monitor some of the cameras which have been deemed to be operationally important 24 hours a day, 7 days a week.

The Pier Masters monitor a live feed of the cameras on the pier while they are on duty. This enables them to keep an eye on the pier, particularly when they are in their office.

Neither the Pier Masters nor VTS have access to playback any footage.

4. Who will The Authority share my information with?

The Authority will only use the information captured by the surveillance system exclusively for the purposes detailed above and The Authority remain the sole controlled and processor of this data.

When a crime, accident, or incident is captured by the surveillance system it may be necessary to pass this information on to third parties such as (but not limited to) the police, Marine Accident Investigation Branch, Health and Safety Executive. In such situations, it is the Authority's preference that the third parties view the footage or images securely at our office but from time to time we may have to hand over your information to them at which point the third party would become the controller and assume responsibility for their copy of the information.

If we have to disclose any data to a third party which contains images or footage of another data subject(s) not involved in the investigation, we will attempt to redact that individual(s) from the disclosed data. If we cannot do this sufficiently well internally, we will pass this task to a specialist data processor to carry out. Data processing agreements have been put in place to ensure this will be done with your privacy in mind.

All requests to access the surveillance system data as well as any disclosures are recorded in accordance with the codes of practice and applicable laws.

5. How long will The Authority keep my information?

Under normal circumstances your information will be retained for no more than 30 calendar days after which point it will be deleted. Images required for investigative or evidential purposes may be retained beyond 30 days and will be securely disposed of upon completion/conclusion of the purpose for which it has been retained.

6. What rights do I have over my personal data?

Under the General Data Protection Regulation, you will have the right to, where appropriate:

- Access your personal data by making a subject access request
- Rectification, erasure or restriction of your information
- Object to the processing of your information

To exercise your rights please contact the Data Compliance Officer using the following contact details:

Data Compliance Officer
Harbour House,
The Quay,
Harwich,
CO12 3HH

Or email: dco@hha.co.uk

7. What if I find your response unsatisfactory?

Should you find our response unsatisfactory, you have the right to lodge a complaint with the supervisory authority – the Information Commissioner’s Office (ICO). You can find more information on the ICO website at <https://ico.org.uk/concerns/> regarding the complaints process.

8. Changes to this privacy notice

We will keep this privacy notice under regular review, and we will place any updates here. At the start of this privacy notice we will tell you when it was last updated.

Version	Date published	Changes
Initial version	09/12/2020	n/a
Version 1.2	01/02/2021	Added in Pier Master CCTV monitoring
Version 1.3	2/2/2021	Document name & formatting change