

# **PRIVACY NOTICE**

## **Body-Worn Cameras**

In Summer 2022, Adur & Worthing Council will be working with our parking enforcement contractor to deploy a body worn video camera system. Our contractor, NSL/Marston Holdings, will be the data controller for the footage captured. Please see below for details of how data will be managed.

### **Data Controller**

NSL Ltd – ICO Registration Z9798193

Marston Holdings – ICO Registration ZA054553

**Data Protection Officer Contact** – [dpo@marstonholdings.co.uk](mailto:dpo@marstonholdings.co.uk)

### **Purposes for processing**

To protect Civil Enforcement Officers from physical assault and other forms of abuse in the course of them undertaking enforcement field services and to support prosecution of assailants in any such event. To reduce incident escalation and to reduce vexatious complaints.

### **Categories of personal data**

Video images and audio recordings of identifiable individuals.

### **Legal basis for processing**

GDPR Article 6(1)(f) – processing is necessary for the purpose of the legitimate interests pursued by the controller.

Processing will be fair and transparent – cameras will only be switched to record when it is perceived necessary to do so and the data subject will be informed by the operator that the camera is being deployed. The cameras will not be switched to

record for general, routine patrolling duties and will not act as supplementary evidence for issuing a Parking Charge Notice (PCN).

## **Data Sharing**

The data will only be accessed by authorised NSL/Marston Holdings staff and will be shared by the Controller with the Council and Police as and when necessary. Sharing will be documented.

## **Special Category Data**

GDPR Article 9(f) - Legal claims or judicial acts

DPA 2018 Schedule 1(10) - Preventing or detecting unlawful acts

Any sensitive or Special Category Data captured will only be processed if it is required in the support of an ongoing Police investigation or if the Civil Enforcement Officer witnesses a crime whilst carrying out their duties.

## **Transfers abroad**

Footage captured will not be transferred abroad.

## **Data Retention**

Footage captured will be stored and processed securely and retained for a period of 45 days unless there is a lawful requirement to retain further.

## **Your Rights**

You have a number of legal rights in relation to your personal data. Please see the data controller's website for information about your rights and how to exercise them – [Marston Holdings privacy notice – Marston Holdings](#)

You also have the right to complain to the regulator, <https://ico.org.uk/>