

It is important that you read this notice so that you are aware of how and why we are collecting or processing personal information about you. We may update this notice at any time.

### **The Purpose of this Document**

IGas Energy Plc and its subsidiaries (“IGas”) are companies committed to protecting the privacy and security of your personal data. This privacy notice describes how through IGas surveillance systems (CCTV, Body Worn Video (“BWV”)) we collect and use personal information about individuals that work and visit our sites and offices. In addition it covers the collection of personal information in situations where we have a legal obligation e.g. injunctions.

### **The Lawful Basis for Processing this Information**

There are two legal basis for which we may process personal information via IGas surveillance systems:

- Primarily it is for ‘Legitimate interests’ - the processing is necessary for our legitimate or the legitimate interests of a third party (Article 6(1) (c) of the GDPR).
- Secondly on occasion it is for a ‘Legal obligation’ – the processing is necessary for IGas to comply with the law (Article 6(1) (e) of the GDPR).
- To the extent that any special categories of personal data are collected i.e. political beliefs, ethnic origin or religious beliefs – the processing is necessary for the establishment and exercise of legal claims (Art 9(2) (f) GDPR).
- In the event the surveillance system captures criminal activity i.e. criminal damage, common assault etc. - the processing is necessary for the purposes of the prevention or detection of an unlawful act (Schedule 1, para. 10 Data Protection Act 2018)

### **Do We Need Consent?**

We do not need your consent. We will process personal data in support of the legitimate interests or legal obligations of the IGas data controllers. The relevant IGas data controller is shown at the sites where we operate CCTV systems. We have the right to disclose your personal data as required by law, or when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, request from a regulator or any other legal process served on the data controllers or members of IGas.

### **Why is the Personal Data Being Processed?**

IGas surveillance systems (CCTV, BWV) are employed at sites and offices primarily for the purpose to make facilities a safer and secure environment, day or night, in order to allow all personnel and visitors the opportunity to participate fully and without fear in the operation and administration of the facility.

They also assist in enabling operational monitoring, incident recording, gathering evidence, deterring potential offenders and the prevention of crime. Recordings may be provided to enforcement agencies with evidence of criminal activity, for formal actions including prosecutions in court and identification of offenders in investigations. It may also be used in accordance with internal investigation procedures and policies as part of an evidence base.

In the case where IGas Injunctions (sites & exclusion zones) exist we may collect personal information about individuals that we consider are breaching these Injunctions or who may be, in the case of surveillance images, within the vicinity of those individuals in order to enforce the Injunction, including recording individuals: (i) to evidence that individuals have notice of the Injunction; and (ii) once individuals have notice, to evidence any breaches of the Injunction; and (iii) to record the commission of any further offences.

There may be occasions where the Regulation of Investigatory Powers Act 2000 (RIPA) may apply, this may include targeted footage of individuals, property and/or assets.

### **How is the personal information processed and stored?**

Information is gathered on a 24/7 basis from CCTV systems and on occasion from BWV and IGas mobile phones. CCTV systems feed real time live video images to secure standalone servers, which may have remote access via internal secure encrypted networks or external networks by authorised individuals/entities having the prerequisite security protocols. We do not use automated decision-making or transfer personal data obtained via IGas surveillance systems outside of EU.

### **How long we will keep your personal information?**

Thirty (30) days is the IGas default setting for recorded images, but system circumstances, capability, requirements and resources may see this either shortened or lengthened. In the cases of information recorded and subsequently stored as potential or confirmed evidence of civil or criminal acts being committed:

- For information stored as potential evidence, but not used it is retained for 6 months.
- For evidence used in civil enforcement cases where no action is taken it is retained for 2 years.
- For evidence used in civil enforcement cases where action is taken it is retained for 6 years.
- For evidence used in all criminal enforcement cases it is retained for 6 years.

In the cases of information recorded and subsequently stored as potential or confirmed evidence in internal disciplinary or grievance proceedings:

- For information stored as potential evidence, but not used, it is retained for 6 months
- For evidence used in internal disciplinary proceedings, it is retained for 6 months from the cessation of employment of the individual(s) against whom the disciplinary action was brought, unless the individual(s) brings a civil or criminal action against the Company post-cessation of employment, in which case it will be retained for 6 years from the completion of that action.
- For evidence used in internal grievance proceedings, it is retained for 6 months from the cessation of employment of the individual(s) bringing the grievance, unless the individual(s) brings a civil or criminal action against the Company post-cessation of employment, in which case it will be retained for 6 years from the completion of that action.

### **What information we may hold about you?**

We may collect, store, and use the following categories of personal information about individuals captured on IGas surveillance systems:

- Images obtained through surveillance systems such as CCTV, BWV, cameras and mobile phones.
- Surveillance systems will record date, time and in some circumstance the location
- In the case of offenders we may record personal details such as; gender, ethnic origin, age and where available personal contact details such as name, title, addresses, telephone numbers, and email addresses.

### **Who we will share your information with?**

Information may be shared with:

- CCTV Operators & Monitors
- IGas legal representation
- Joint Venture (JV) Partners
- Police Forces
- Insurance Companies
- Crown Prosecution Service
- HM Court and Tribunal Services
- Health and Safety Executive

### **Your rights as a data subject?**

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- *Right of access* – you have the right to request a copy of the information that we hold about you.
- *Right of rectification* – you have a right to request that we correct data that we hold about you that is inaccurate or incomplete.
- *Right to request erasure* – you can ask for the data we hold about you to be erased from our records where there is no good reason for us to continue processing it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing.
- *Right to restriction of processing* – you have the right to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- *Right to object* – you have the right to object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- *Right to judicial review*: in the event that we refuse your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in the *Complaints* section below.

The above rights are subject to exemptions set out under Schedules 2 and 3 of the Data Protection Act 2018. If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data please contact our Data Protection Officer at [data.compliance@igasplc.com](mailto:data.compliance@igasplc.com).

### **Complaints**

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO) <https://ico.org.uk/concerns/handling>, the UK supervisory authority for data protection issues. However, please consider contacting our Data Protection Officer via email at: [data.compliance@igasplc.com](mailto:data.compliance@igasplc.com), in the first instance. In certain circumstances you may also be able to seek a judicial remedy.

### **Security**

We have put in place security measures to aid in the protection of your personal data and enable the prevention of accidental loss, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected or actual personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### **Links**

Our websites may contain links to other websites, but this privacy statement applies only to personal data collected via IGas surveillance systems. When using our websites then you should read the appropriate privacy notice for that website.

### **Changes to the privacy statement**

We may update this privacy statement from time to time and recommend that you revisit it on occasion to see the latest version. This statement was last updated in November 19<sup>th</sup> 2018.