



## VIDEO CAMERA TECHNOLOGY PRIVACY POLICY

Piranha Parcels Limited (“the Company”) makes its vehicles available to its employees & self-employed drivers (“sub-contractors”), for use, as delivery associates, in connection with the provision of parcel delivery related services (“Services”) that are provided to Piranha Parcels Limited.

These vehicles may be equipped with video camera technology (the “Technology”). The primary purposes of the technology are to assist in the protection and safety of drivers, property and passengers, prevention of criminal offences, and defence of potential legal claims.

This Privacy Policy describes the information collected by the technology, and how that information is used, stored, shared, and protected by Piranha Parcels Limited.

All drivers are aware if there is a Dash Cam fitted to their allocated vehicle and have been trained in the use of video camera technology, as part of their induction. All staff & sub-contractors are required to review this policy and consent to the use of AI camera monitoring in Company vehicles.

Dash Cams are set up in a way that ensures that there is minimal intrusion of privacy, and that any intrusion is fully justified as a legitimate interest.

The following principles apply to the video camera technology;

- Cameras record 100% of the time, while a vehicle is active
- Cameras cannot be remotely viewed in real time
- Cameras do NOT record audio footage
- No images and information will be stored except where a relevant incident has occurred
- Cameras only retain up to 20 seconds of the incident.

### **What data do we collect?**

- Video camera recordings of the vehicle interior (including occupants of the driver and passenger seats) and external views to the front, rear, right, and left of the vehicle. Portions of this footage may be uploaded from the device to the technology’s third-party secure servers, for example; in the following circumstances:
  - Immediately when you tell the camera to record and upload;
  - Immediately when the camera detects that a potential safety incident has occurred;
  - If still available, when requested by the Company’s Data Protection Officer;
- Information related to your operation of the vehicle including the following:
  - Vehicle location and movements, such as miles driven, speed, acceleration, braking, turns, following distance; Contextual factors outside the vehicle, such as traffic lights and stop signs and proximity to other vehicles;
  - Potential traffic violations, such as speeding, seatbelt non-compliance, and failure to stop at a stop sign;
  - Potentially risky driver behaviour, such as distracted driving or drowsy driving.

## **How do we use the data we have collected?**

- To verify the driver's identity
- To promote driver safety, and the safety of all Piranha Parcels Limited's staff, including by providing real-time in-vehicle alerts, via the technology, when potentially dangerous conditions or behaviours are detected
- To assess employees/sub-contractors ongoing eligibility to perform services under their Service Level Agreement with Piranha Parcels Limited, in accordance with eligibility requirements and service standards outlined in the Driver Standards Policy
- To manage Piranha Parcels Limited's contractual relationship with you, including assessing your compliance with Company policies and service standards
- To support operations, safety programs, and incident investigations by making the technology available to the Company Directors via a secure portal
- To troubleshoot and improve Piranha Parcels Limited's services and the performance of hire
- To improve the accuracy of mapping, routing and navigation data
- To support insurance claims or disputes
- In legal proceedings, and/or to defend Piranha Parcels Limited's legal position in legal proceedings.
- For employment purposes, including as part of an investigation of suspected misconduct or violation of safety or other Piranha Parcels Limited policies, based on the reasonable belief of management or litigation.

Where an incident is captured that reveals inappropriate conduct, that cannot in good conscience be ignored, the Company Directors, reserve the right to process stored data in the business interests. This may include grievance, or disciplinary proceedings, defence or litigation of a legal claim, and driver training.

When relevant to do so, camera footage may be retained and used for future Health & Safety training, including the improvement in safety quality and training of drivers.

We shall seek the sub-contractor's consent should we wish to use it for this purpose.

## **Who do we share your data with?**

Access to retained images and information will be restricted, with clearly defined rules to Designated Responsible Persons (DRPs) who can gain access.

Designated Responsible Persons (DRPs) are Company Directors and Management of VP Chauffeurs Ltd

We will NEVER pass your personal data to or allow access to your personal information by third-party service providers or organisations.

Where an incident involves a third party, the relevant insurers will be informed of the details. Although the third party may be made aware that there is recorded evidence in the form of video camera footage, a copy of the recorded material can only be obtained if requested by the subject themselves. Third Parties should also be aware that under appropriate circumstances the footage may be provided to Police (or other relevant Authority) with the intention to prosecute for criminal offences. In defence of legal claims, or in pursuance of civil recovery, footage may also be provided to our legal representatives with the intention of providing evidence before the courts.

Under appropriate circumstances data may be provided to law enforcement, the council licensing authority, insurers, or any other entity where we have a legal obligation to do so. Any other person with a legitimate interest must obtain authority from the Data Protection Officer to view recorded footage, providing reasons and justification.

## **Where do we store your data?**

All video camera technology data is stored on the secure servers of the Company's cloud-based Fleet Management software provider, Geotab.

## **How long do we store your data?**

Incident footage will be subject to a retention period of 3 years.

Where footage is used in disciplinary proceedings, accident claims management or legal proceedings it will be retained for a further period of up to five years.

## **How do I obtain access to the data you hold about me? – Your Rights**

Any persons whose images are recorded have a right to view those images, and to be provided with a copy of those images, within one month of making a written Subject Access Request.

Availability of images will be subject to the retention period.

Sub-contractors making such a request should do so in writing, providing the relevant time and date of the image or footage so that they may be easily identifiable.

Sub-contractors will be permitted to see and respond to the images, in addition to their right to request a copy, which will be provided within 28 days.

- You can be provided with a copy of any personal data concerning you that we process, unless that would affect the rights and freedoms of others. You can also be provided with information on how that personal data is processed by us.
- You can have us rectify any personal data of yours that we hold that is inaccurate or incomplete. In certain circumstances, you can also ask us to erase or restrict the use of any of your personal data that we process.
- You can object at any time to our processing of your personal data on grounds related to your particular situation.
- You can object at any time to our processing of your personal data for direct marketing purposes.
- You can exercise any of the rights listed above by contacting us using the details below.
- If you are unhappy with any aspect of how we processed your personal data or your request to exercise a right, you can lodge a complaint with the Information Commissioner's Office.

The Subject Access Request should be made to [accounts@valeprestige.co.uk](mailto:accounts@valeprestige.co.uk) or by writing to the GDPR Data Protection Officer, Piranha Parcels Limited, 3 New Bridge Square, Swindon, Wiltshire, SN1 1HN.

## **Changes to our privacy policy**

As AI technology evolves and becomes more prevalent and available in our industry we may need, from time to time, to amend our Privacy Policy to account for these changes.

You will be notified in writing of any changes we may make to our privacy policy.

## **Contact**

Questions, comments and requests regarding this privacy policy are welcomed and should be made to [enquiries@piranhaparcels.com](mailto:enquiries@piranhaparcels.com) or by writing to the GDPR Data Protection Officer, Piranha Parcels Limited, 3 New Bridge Square, Swindon, Wiltshire, SN1 1HN.