

ICANPROVE.IT LIMITED “ICPI” PRIVACY NOTICE.

This privacy notice provides information on how ICPI collects and processes your personal data when you visit our website. There are two categories of personal data we process. (1) The processing of enquiries from the representatives of prospective clients or clients (**Client Personal Data**); (2) the CCTV content that ICPI processes for its clients (**CCCTV Personal Data**).

We may transfer, store and process your personal data outside the European Economic Area. More detail can be found [here](#).

We do not use automated decision making to make a decision that affects any data subject.

1. Important information and who we are

ICPI is the controller and responsible for your personal data. Our full contact details are:

- ✓ Full name of legal entity: ICANPROVE.IT LIMITED;
- ✓ Name or title of data privacy manager: Michelle Urtel;
- ✓ Email address: michelle.urtel@icanprove.it;
- ✓ Postal address: GROUND FLOOR, Ground Floor 4 Gleneagles Court, Brighton Road, Crawley, West Sussex, RH10 6AD.

2. The data we collect about you

In relation to Client Personal Data we may collect, use, store and transfer different kinds of personal data about you as follows:

- *Identity Data.* includes first name and last name.
- *Contact Data.* includes billing address, delivery address, email address and telephone numbers
- *Technical Data.* includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.

The Client CCTV Personal Data is footage of people recorded by the CCTV installed by our clients.



3. How we use your personal data

We will only use Client Personal Data to manage your relationship with us. Our lawful basis for processing Client Personal Data is either in our legitimate interest in that the processing allows us to progress enquiries which have come from the data subjects. The data subjects can opt out at any time.

We will release CCTV Personal Data when we believe it is appropriate to comply with the law or to apply with any contract with a client. This includes exchanging information with other companies and organisations (including, but not limited to, the police, our insurers and loss adjusters) for alleged fraud; any theft of property owned by the client or to establish liability for any road traffic incident or credit risk reduction. Obviously, however, this does not include selling, renting, sharing, or otherwise disclosing personally identifiable information for commercial purposes.

The processing of the CCTV Personal Data involves:

- ❖ assisting our clients managing their business as the CCTV system enables it to monitor the movements and condition of its vehicles and the safety of the vehicles' contents;
- ❖ to assist in resolving any criminal activity captured in the CCTV;
- ❖ to protect the Company's vehicles staff from intrusion, theft, vandalism, damage or disruption.

The legal basis for the Company's use of the CCTV Personal Data is that the processing is necessary for:

- (1) the legitimate interests set out in this paragraph 3 (provided that those interests are not overridden by individuals' rights and interests). The client may also need to use this personal data in order to establish, exercise or defend against legal claims
- (2) processing is necessary for the performance of a task carried out in the public interest and the processing is necessary for compliance with a legal obligation to which the controller is subject.

Although the client will manage the camera surveillance to the extent that we do so either independently or in concert with our client we will adhere to the following provisions of the Camera Surveillance Code:

- 6 *No more images and information should be stored than that which is strictly required for the stated purpose of a surveillance camera system, and such images and information should be deleted once their purposes have been discharged.*
- 7 *Access to retained images and information should be restricted and there must be clearly defined rules on who can gain access and for what purpose such access is granted; the disclosure of images and information should only take place when it is necessary for such a purpose or for law enforcement purposes.*

4. Retention of Personal Data

We will only retain your Client Personal Data for as long as reasonably necessary to fulfil the purposes for which we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Turning to the CCTV Personal Data we will automatically delete such footage on a 30-day rolling basis for a month unless specific images are required to be retained in order to deal with an incident or in order to respond to a request by an individual made under the law (see paragraph 7). The images captured by the CCTV System will not be stored for any longer than is required in order to achieve the purposes identified in paragraph 3.

5. Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, 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. The CCTV Personal Data is encrypted.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

6. How we share your personal data

In addition to the CCTV Personal Data shared with clients, insurers, the police or public authorities we may share your personal data with external third parties. More details can be found [here](#).

7. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- *Request access to your personal data.*
- *Request correction of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*
- *Request restriction of processing your personal data.*
- *Request transfer of your personal data.*
- *Right to withdraw consent.*

If you wish to exercise any of the rights set out above, please contact us.

No Fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time Limit to Respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

8. Further details

If you are looking for more information regarding how we process your personal data including on data security, data retention and lawful processing bases, please contact us (see paragraph 1).

A data subject has the right to make a complaint at any time to the ICO, the UK data protection regulator. The ICO can be contacted by telephone on [0303 123 1113](tel:03031231113) or by post as follows: Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or via email at casework@ico.org.uk.

