



MOTO HOSPITALITY LIMITED

VISITORS CCTV AND MONITORING PRIVACY NOTICE

1. **Why does Moto operate CCTV and Monitoring Systems?**

- 1.1 Moto Hospitality Limited¹ ("Moto") is a "data controller" as it decides how to hold and use personal data, including images from its CCTV and monitoring systems, (including its automatic number plate recognition system, operated in the car parks) and audio-visual or voice interaction recordings with conflict management systems operated at sites, (such as within forecourt areas and adult gaming centres).
- 1.2 Moto has considered the need for CCTV and monitoring systems and their appropriate uses. It has decided that such systems are currently required for:
- (a) the prevention and detection of crime;
 - (b) the protection and safety of customers, colleagues and other visitors to our premises; and
 - (c) to protect and develop the business interests of Moto, for example by:
 - (i) monitoring premises to ensure compliance with licences (for example, in relation to adult gaming centres ("AGCs"));
 - (ii) monitoring premises and vehicles, and/or analysing data in relation to site visits, in order to provide effective customer services and benefits;
 - (iii) to support car park charging, via a number plate recognition system (currently operated at Moto's sites by a third party on behalf of Moto);
 - (iv) to support the training and development of colleagues, and in some circumstances, for use in investigations, disciplinarys and grievances;
 - (v) for use in investigation of complaints and/or health and safety matters, and/or
 - (vi) for Moto's insurance purposes.
- 1.3 Some of the audio and/or visual images, sounds and/or recordings, and other data from these CCTV and monitoring systems, as well as any personal information which you might provide to us when you contact us, may constitute your personal data. There are various lawful bases on which Moto is permitted to process this personal data, including as follows:
- (a) in order to comply with our legal obligations, for example in relation to monitoring compliance with premises licences;

¹ **Registered office:** Toddington Service Area, Junction 11/12 of M1 Motorway (Southbound) Toddington, Bedfordshire, LU5 6HR;
Company Registration Number: 734299

- (b) in order to perform an agreement with you, for example, in relation to paid parking at our sites or self-exclusion from our gaming areas;
- (c) where it is in our legitimate interests, or those of a third party, to process this data, for example in relation to any of the reasons set out in point 1.2;
- (d) it is necessary for the purposes of carrying out our obligations and exercising our rights or those of the data subject in relation to employment, social security and social protection law;
- (e) it is necessary to protect your vital interests or those of another person, (which may include where you or such other person is physically or legally incapable of giving consent);
- (f) it is necessary for the establishment, exercise or defence of legal claims.

Occasionally, there may be other permitted legal bases for processing this data.

1.4 Where your Personal Data may include Criminal Offences Data and/or Special Categories of Personal Data, the additional Processing conditions on which Moto relies are that the processing:

- (a) has been given explicit consent by the individual;
- (b) is necessary for the purposes of performing or exercising obligations or rights imposed or conferred by law on Moto or the data subject in connection with employment, social security or social protection;
- (c) meets one of the substantial public interest conditions, such as (a) preventing or detecting unlawful acts; (b) regulatory requirements relating to unlawful acts and dishonesty, etc; (c) suspicion of terrorist financing or money laundering;
- (d) for insurance purposes; and/or
- (e) meets the conditions relating to Legal Claims (including processing is necessary for obtaining legal advice and/or the establishment, exercise or defence of legal rights).

2 How does Moto safeguard its CCTV and monitoring systems and the data processed by them?

2.1 Moto complies with current data protection legislation and has a detailed CCTV, Surveillance and Monitoring Systems Policy including management guidelines and procedures, which ensure that compliance is adhered to. More information about the guidelines within which CCTV should be operated is available at www.ico.gov.uk.

2.2 Where Moto contracts with third party data processors it will ensure that appropriate contractual provisions are included in such contracts.

2.3 Moto does not currently intend to transfer any data from our CCTV and monitoring systems, or any other personal data connected with such images (e.g. which you may supply to us) outside the U.K or countries considered "adequate" under UK law. However, if at any time we do transfer your data to, or store your data in, a location outside the U.K. or other countries considered "adequate" under UK law, we will ensure that appropriate safeguards are in place, as required by law, to ensure the standard of protection of Personal Data remains essentially equivalent to that provided in the UK.

3. Who might my personal data be shared with?

- 3.1 The audio and/or visual images, sounds and/or recordings from our CCTV and other monitoring systems, together with any personal data which may be connected with and/or extracted from such audio and/or visual images, sounds and/or recordings (for example: vehicle registration numbers; information supplied where a visitor or registered keeper corresponds with Moto, or with the third party car park operator; or supplier or account holder information held by Moto) may be shared with various third parties, including:
- (a) regulatory authorities, law enforcement agencies and emergency services (for example, the police, HMRC, Environmental Health Officers, the ambulance service and the DVLA);
 - (b) our third-party data processors, including CCTV monitoring services, , and our IT and communications services providers, (all of whom may process data on our behalf, with an appropriate data processing agreement in place);
 - (c) conflict management centres (who may record audio and/or CCTV interactions between the conflict management centre and Moto colleagues and/or visitors);
 - (d) with our insurers (or, in certain circumstances, at Moto's discretion, with third parties and/or their insurance companies);
 - (e) with other licensed premises operators or associated bodies (e.g. a Multiple Operator Self-Exclusion System provider), where Moto believes that criminal activity has taken place and/or where individuals have requested to self-exclude from gaming premises;
 - (f) our car park operators, who control the data jointly with us, and any third parties they may appoint to recover any unpaid amounts in relation to parking and/or any other parties who may be referred to in the car parking operator's privacy policies or notices (see below);
 - (g) our parking or other account holders and/or other suppliers (e.g. in connection with account or supplier queries and/or the prevention and/or detection of crime);
 - (h) in relation to vehicle data, with third parties who undertake analysis of the information on our behalf, in order to provide effective customer service and benefits.
- 3.2 In addition, there may be circumstances where we share data with other third parties, provided that we are legally permitted, or required, to do so (for example, where we provide CCTV footage in response to a data subject access request, and it is reasonable to comply with the request without obtaining the consent of all the other individuals in the footage).
- 3.3 Please note that a party with whom we share personal data may also be, or then become, a data controller in relation to such personal data, for example where they process it for their own purposes and/or exercise control over the processing. For example, regulatory authorities are independent Data Controllers, as are our car park operators and the AGC Multiple Operator Self-Exclusion System provider, IHL Limited. (Please see the privacy notice of our AGC Multiple Operator Self-Exclusion System provider: <https://ihlhub.com/privacy-policy/>)
- 3.4 The images and/or extracted data from our CCTV and monitoring systems, and any audio and/or CCTV recordings from conflict management systems, as well as any connected personal information e.g. which you might provide to us when you contact us, may also

be shared internally, within Moto, to relevant colleagues who may require access to such information for Moto's specified purposes.

4. How long does Moto retain the data for?

- 4.1 Images from CCTV cameras are routinely retained for between 7 and 31 days, depending upon the monitoring system in use. (Duration may depend upon whether a digital system is activated to record by movement detection).

However, if a potential incident occurs, which requires further investigation, existing images will be retained by, or on behalf of, Moto for up to 31 days after the investigation concludes and the incident is fully closed. In addition, where legal issues have arisen, or may arise, images may be kept for appropriate longer periods, in accordance with legal advice.

- 4.2 Audio and/or audio-visual recordings of interactions between visitors and/or colleagues and conflict management centres (who process such data on behalf of Moto) will be retained for 30 days, unless they are required for further investigation and/or evidence, where an incident has occurred, in which case they will be retained by or on behalf of Moto for as long as is appropriate in the circumstances, as required by Moto.
- 4.3 Images from the ANPR system are collected by our third-party car park operators and are retained by them, as Data Controllers, in accordance with the timescales set out in the DVLA KADOE (Keeper of a Vehicle at the Date of an Event) contract that they are required to have in place in order to obtain keeper details from the DVLA, and any statutory or professional retention periods applicable in their respective industries and/or as may otherwise be required by law and in line with their data retention policies.
For further information, please contact see <https://groupnexus.co.uk/privacy-policy>.
- 4.4 Where a potential incident occurs at a Moto site (e.g. suspected theft) and there is a vehicle which we believe to be associated with such incident, we may retain details of the vehicle (including the vehicle registration number) via our ANPR system, so that we are alerted if the same vehicle registration number enters any of our sites again. Such alerts are retained on our ANPR system for 6 months from the date the vehicle last entered one of our sites.

5. What are my Rights in connection with the images/personal data that Moto might hold of me?

- 5.1 Individuals may request a copy of their personal data, including images that we might hold of them. It is the individual's responsibility to provide Moto with necessary details, including when and where they visited our premises, in order for Moto to locate any relevant images and/or personal data. In addition, Moto may request ID evidence, if required, to ensure that the person making the request is the person whose Personal Data has been captured. Moto may be unable to comply with a request that is not accompanied by sufficient detail to allow Moto to identify the individual and/or locate the images and/or personal data. If you do not provide us with sufficient information we will contact you to inform you of this within 14 days.
- 5.2 Properly requested personal data and/or images, if available, will be provided within one month (unless special circumstances apply). If no image and/or personal data of the

requesting person can be located, this will be explained to the individual within one month.

- 5.3 In relation to requests for information from our ANPR system, as the system only captures vehicle information images, it is only the Registered Keeper that has the right to request information relating to their vehicle. You will therefore be required to provide evidence that you were the keeper of the vehicle at the particular date and time in relation to which the request is made. Please also note that where a third party operates the car parks on our behalf, and such car park operator applies to the DVLA for registered keeper details, these details will **not** generally be made available to Moto by the car park operator (unless this is necessary in relation to a specific query or complaint by an individual), but will be handled appropriately in accordance with such third party car park operator's privacy policy. Please see the privacy notice of our car park operators at the following website: <https://groupnexus.co.uk/privacy-policy>

If you would like any information in relation to your personal data that may be held on the ANPR system, please email us at: parking.queries@moto-way.co.uk and ensure that you put "ANPRS" in the header. Where we do not hold the information you have requested, we will forward your email to the applicable car park operator, who will respond to you accordingly. You may also contact the car park operator direct.

- 5.4 Please note that if a request is clearly unfounded, or excessive, Moto is entitled to refuse to act on the request or we may charge you a reasonable fee. If this applies, we will contact you to inform you.
- 5.5 In some circumstances, individuals may request that we erase data and/or CCTV footage of themselves or restrict our processing of it, for example, where the data has been unlawfully processed or (if applicable) it is no longer in Moto's legitimate interests to continue processing the data. Please note that we do not always need to agree with your request but we must provide you with a reason where we do not agree.
- 5.6 If you would like Moto to provide you with any CCTV images held of you, and/or audio recordings made when the conflict management systems are activated, please complete the form below and return it to Customer.Services@moto-way.co.uk, or by post to Customer Services at Toddington Services, M1 Southbound, Toddington Beds, LU56HR. Subject to, and in accordance with the statement above, Moto will liaise with the appropriate colleagues, including at the relevant site, and then email or post to you a USB stick or other media storage device or file containing the footage (whichever is appropriate to the system at the location concerned). This will be posted/emailed to the address on the request form.

6. Comments and Requests

If you have any comments or complaints about the way in which data from Moto's CCTV, surveillance and monitoring systems is being processed, and/or any other requests in relation to your personal data please contact Moto at: dataprotection@moto-way.co.uk. You also have the right to contact the Information Commissioner's Office (the UK's independent body set up to uphold information rights).

CCTV and/or Conflict Management System Audio recordings - Visitor Data Access Request Form

Your Name: _____

Your Address: _____

Postcode: _____

Day Time

Contact Number: _____

Date of this Request: _____

Which site did you visit? _____

Which carriage way were you on? North / South / East / West

What date did you visit the site? * _____

What time did you arrive on site? _____

What time did you leave site? _____

Which brands or offers did you visit? _____

Please describe what you were wearing that day _____

Reason for the request: _____

- **Please provide a copy of your passport or driving licence, as evidence of your ID, together with a clear photo of yourself, so that we can identify you in any CCTV footage.** Once we have received your ID evidence, we will record the type of ID you have supplied in our DSAR log (together with your details and details of your request) but we will not retain copies of your ID documents. Personal Data within our DSAR log will be permanently deleted where there has been no further correspondence in relation to the DSAR for at least 36 months.
 - Please note that, in line with government guidelines for retail businesses and shopping centres, **Moto only retains CCTV images for a maximum of 31 days.**
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