General Privacy Notice – Body-Worn Camera Footage

Data Controller: BJS
Contact: data.protection@bjshomedelivery.com

1. Purpose of Processing

We collect and process body-worn camera footage to:

- Ensure staff and customer safety during deliveries
- Support investigations, complaints, or incidents
- Comply with legal obligations and organisational policies
- Protect property and assets

Footage will only be accessed, shared, or retained where necessary for these legitimate purposes.

2. Lawful Basis for Processing

Under UK GDPR and the Data Protection Act 2018, we process footage based on:

- Legal obligation – to comply with law enforcement, health, and safety regulations
- Legitimate interests – ensuring safety, security, and operational integrity
- Consent – where appropriate, e.g., public events or special projects

3. Categories of Personal Data

Footage may capture:

- Images and voices of staff, customers, or third parties
- Date, time, and location of recordings
- Incident-related activities

4. Transparency and Customer Notification

- Drivers are required to verbally notify customers at the start of a delivery that they are wearing a body camera and that recording is active.
- Drivers will also carry a visible sign indicating that body-worn cameras are in use.
- Customers may also be notified in advance through pre-delivery communications such as order confirmation emails or SMS messages.

5. Access and Disclosure

Access to footage is strictly limited to authorised personnel. Footage may only be shared:

- Within the organisation, for legitimate business purposes
- With law enforcement or regulators, if required by law
- With third parties under formal agreements ensuring data protection

Unauthorised access, disclosure, or sharing is prohibited.

6. Retention

Footage is retained for 30 days from the date of recording, unless it is required for an ongoing investigation or legal obligation, in which case it may be retained longer.

7. Handling Private Areas

A private area includes any space where an individual has a reasonable expectation of privacy, such as bedrooms or similar rooms in delivery locations. Drivers are expected to respect these areas when making deliveries.

8. Security

All footage is stored in secure systems. Copying, downloading, or storing footage outside approved systems is strictly prohibited. Technical and organisational measures are in place to protect data against unauthorised access, loss, or damage.

9. Customer Rights

Customers have the right to:

- Request access to footage that contains their personal data
- Request correction of inaccurate data
- Request deletion or restriction, where applicable
- Object to processing, where applicable
- Lodge a complaint with the Information Commissioner's Office (ICO) if they believe their data has been misused

Requests should be directed to: data.protection@bjshomedelivery.com