

Reynolds Catering Supplies - Visitor CCTV and Thermal Imaging Privacy Notice

Reynolds Catering Supplies is collecting your personal data. When we collect personal data, we are obliged legally to provide you with certain information, it is called the "Right to be Informed". That information is contained in the below Notice. If any of the information we provide to you is not clear enough, the contact details for Company's Data Protection Officer can be obtained by emailing HRstaffs@reynolds-cs.com, please do not hesitate to make contact and ask for further information.

1. Why we process your data through CCTV

The Reynolds Group has CCTV across its infrastructure, including our reception area. CCTV will capture images in real time in whichever direction the cameras are pointed, and these cameras will capture footage of you whilst you are on the premises. Cameras have been situated both inside and outside the buildings.

We are collecting and processing personal information via the CCTV systems for the following purposes:

- To ensure the health and safety of everyone on site including visitors.
- To detect, prevent or reduce the incidence of crime.
- To prevent and respond effectively to all forms of possible harassment and disorder.
- To reduce the fear of crime.
- To create a safer environment.
- To provide emergency services assistance.
- To monitor vehicle and MHE movements and their users, throughout the Group for security purposes.

1a. COVID-19 Thermal Image Screening

In response to the COVID-19 pandemic, Reynolds will record your skin temperature through a thermal imaging device 'bolted on' to our existing CCTV cameras. Thermal imaging cameras are located in the entrances to our site buildings and Warehouses. A portable temperature check device may also be used where an initial scan has shown a temperature of above 38 degrees and the individual wishes to be re-tested following a short rest period.

Health data will be captured to identify any individual with a skin temperature above 38 degrees, as a high temperature is a symptom of COVID-19. This reading will be taken from a distance at the forehead. Access to any other areas of the building will be denied to those with a skin temperature of 38.1 degrees, and above, as a precaution to safeguard all visitors and staff from exposure to COVID-19.

The Reynolds Group will be guided by Public Health England and World Health Organisation advice. Thermal imaging technology will only be used in the context of a pandemic and will be disabled when the level of risk to visitors and staff has lowered to an acceptable level.

2. Our legal basis for processing your personal information

Our lawful bases for processing CCTV data in accordance with conditions of the GDPR allows us to.

- carry out legally required duties
- carry out our legitimate interests

- *protect public interest

**Thermal imaging data will be processed in the public interest. As a responsible employer Reynolds, must take measures to reduce the opportunity for visitor and staff exposure to COVID-19 and limit the spread of the virus.*

Who we will share your personal information with?

There may on occasion be a need to share a small amount of CCTV with the police force, our local authorities or the emergency services. Information Sharing Agreements will be in place and records will be kept to document how the Reynolds Group share the CCTV footage with other organisations lawfully.

Internally CCTV footage will only be processed by employees who are authorised to do so and any other departments where a legitimate and lawful reason for their involvement is required. All access is monitored and recorded.

Thermal images will be processed by authorised employees through a live feed, at a strategically placed station. This is to enable us to identify those with a temperature above 38 degrees and approach that individual to prevent further entry into other areas of the business. Your stored thermal images will not be shared with any third-party and will not be used for any other purpose.

4. Where your personal information will be stored or transferred to

CCTV (including thermal imaging) Footage will be stored on secure Reynolds servers based within the UK and will not transfer personal data to countries outside of the UK without the appropriate Data Transfer Agreements.

5. How long we will keep your personal information for

The CCTV system will keep footage for 31 days, at which point it will be automatically overwritten; this includes thermal imaging footage and temperature readings.

Any footage which is pulled from the system for official purposes will be subject to departmental retention schedules. If you have any questions surrounding these department specific retention timescales, you can request that information from the Data Protection Officer, whose can be contacted by emailing HRstaffs@reynolds-cs.com.