

# **PRIVACY POLICY - THE SILVER FOX CAFÉ - Established July 2021**

**Our contact details: -**

**The Silver Fox Café**

**A48 Broadoak, Newnham-on-Severn, Gloucester, Gloucestershire. GL14 1JB**

**Tel: +44 1452 877831**

**Email: [info@thesilverfoxcafe.co.uk](mailto:info@thesilverfoxcafe.co.uk)**

## **Introduction**

At The Silver Fox Café we value the relationships we build. We are committed to protecting your privacy and make sure we protect any personal information you give us.

These 6 Pages, will let you know how we use and protect your personal information, if at anytime you have any questions about it, please use the email address, telephone number or postal address above marked for the attention of Malcolm Ward, Amanda Ward or Charlotte McNaught

The Silver Fox Cafe uses closed circuit television (CCTV) images to protect the Cafes property and to provide a safe and secure environment for employees and visitors to the Cafés business premises. This policy sets out the details of how The Silver Fox Cafe will collect, use and store CCTV images. For more information on your privacy rights associated with the processing of your personal data collected through CCTV images please refer to The Silver Fox Cafe privacy notice and data protection policy.

## **Legal Status of The Silver Fox Café**

The Silver Fox Café is registered under the Data Protection Act 2018 with the Information Commissioners Office (ICO) registration number **ZB673855**

The Silver Fox Cafés CCTV facility, unless there are exceptional circumstances will only record images. There is no audio recording i.e. conversations are not recorded on CCTV

## **What information do we collect?**

Personal information is any information that can be used to identify you. You may give us information about yourself with us directly, by telephone or email. This includes booking a table reservation, asking a question or reporting a problem. The information may include the following:

- Contact details including your name and telephone number are added to a reservation diary, which is locked away securely at the end of each shift
- Processing and following up on feedback or enquiries.

- Emails from customers are only accessed by Malcolm Ward, Amanda Ward or Charlotte McNaught
- We use a Takepayments system for card purchases, these machines are compliant with the Payment Card Industry Data Security Standards (PCIDSS) Following these rules helps to lessen the risk of data breaches and fraud, making it a safer option for processing payments
- Supplier details and staff member details are kept securely on Face ID technology only accessed by Malcolm Ward, Amanda Ward or Charlotte McNaught
- Health information (including dietary requirements, allergies and health conditions)

We do not retain any data for statistical analysis for the purpose of monitoring sales.

### **The Silver Fox Cafés CCTV**

The Silver Fox Cafe has carried out a data protection impact assessment and on the basis of its findings it considers it necessary and proportionate to install and use a CCTV system which is password protected. The data collected from the system will assist in:

- Prevention or detection of crime or equivalent malpractice.
- Protection of health and safety to the staff and customers.
- Customer care and staff welfare is adhered to at all times.
- Identification and prosecution of offenders with the support of authorities.
- Monitoring of the security of The Silver Fox Cafés business premises.
- Ensuring that health and safety rules at The Silver Fox Café, procedures are being complied with.
- Identification of unauthorised actions or unsafe working practices that might result in disciplinary proceedings being instituted against employees and to assist in providing relevant evidence.

### **Location of cameras**

Cameras are located at strategic points throughout The Silver Fox Cafés business premises, principally at the entrance, exit points, point of sales area, corridor and back store room. The Silver Fox Café has positioned the cameras so that they only cover communal public areas and storage areas for staff only usage and The Silver Fox Café business premises and they have been sited so that they provide clear images. No camera focuses, or will focus, on toilets, shower facilities, changing rooms, staff kitchen areas, staff break rooms or private offices. All cameras are also clearly visible. Appropriate signs on entering the café and at the point of sale are prominently displayed so that employees, clients, customers and other visitors are aware they are entering an area covered by CCTV.

## **Recording and retention of images**

Images produced by the CCTV equipment are intended to be as clear as possible so that they are effective for the purposes set out above. Maintenance checks of the equipment are undertaken on a regular basis to ensure it is working properly and that the media is producing high quality images. Images are recorded 24 hours a day as The Silver Fox Café is only open the majority of the time 9am – 5pm 7 days a week. As the recording system records digital images, any CCTV images that are held on the hard drive server which are overwritten every 4 weeks and will be erased prior to any disposal. Access to prerecorded images and disclosures or transferred on to, removable media such as CDs, memory sticks are only done in the event of police or law enforcement agency requesting information and would be destroyed once the purpose of the recording is no longer relevant at The Silver Fox Café. In the sad event images are handed over to Police or Law enforcement they have their own time scales which we do not know the answer too or have any control over. Disclosure of images to other third parties will only be made in accordance with the purposes for which the system is used and will be limited to:

- The police and other law enforcement agencies, where the images recorded could assist in the prevention or detection of a crime or the identification and prosecution of an offender or the identification of a victim or witness.
- Prosecution agencies, such as the Crown Prosecution Service.
- Relevant legal representatives.
- Line managers involved with The Silver Fox Café disciplinary and performance management processes.

Malcolm Ward of The Silver Fox Café or Amanda Ward or Charlotte McNaught acting in Malcolm Wards absence or to assist Malcolm Ward are the only persons who are permitted to authorise disclosure of images to external third parties as above. The Silver Fox Café will only hold the images for a maximum of 4 weeks and then it is recorded over or automatically deleted. All requests for disclosures and access to images will be documented by The Silver Fox Café the incident date and crime number with no personal details added, to whom the images have been provided and any subsequent requests by Law Enforcements agencies as above

## **Individuals' access rights**

Under the UK's data protection laws, including the General Data Protection Regulation (GDPR), individuals have the right on request to receive a copy of the personal data that the Company holds about them, including CCTV images if they are recognisable from the image. This can only happen with the 4 week period as the CCTV images are not accessible to anyone as they have been re-recorded over on The Silver Fox Café system

If you wish to access any CCTV images relating to you, you must make a written request to The Silver Fox Cafés Data Protection Officer Malcolm Ward. Page 3 of 5

This can be done by using this email address [info@thesilverfoxcafe.co.uk](mailto:info@thesilverfoxcafe.co.uk). The Silver Fox Café will usually not make a charge for such a request.

Your request must include the date and approximate time when the images were recorded and the location of the particular CCTV camera, so that the images can be easily located and your identity can be established as the person in the images. The Silver Fox Café will usually respond promptly and in any case within one month of receiving a request. However, where a request is complex or numerous The Silver Fox Café may extend the one month to respond by a further two months. The Silver Fox Café will always check the identity of the employee or customer making the request before processing it, so be assured your information will not be given to anyone else other than Law enforcement ie police, crown prosecution etc as above states

### **Data protection principles**

The Silver Fox Café will comply with data protection law, any personal information we hold about you will be:

- Used lawfully, fairly and in a transparent way
- Collected only for reasons that we have explained above
- Accurate and kept up to date
- Kept only as long as necessary for the reasons we have explained above
- Kept securely
- We use your personal information to reply to you
- We will not pass your information to any third parties unless we comply with a legal obligation, when we believe in good faith that an applicable law requires or requests an investigation

### **The Data Protection Officer**

Malcolm Ward, in his absence either Amanda Ward or Charlotte McNaught have the authority to access

If The Silver Fox Café is unable to comply with your request because access could impact the prevention or detection of crime or the apprehension or prosecution of offenders, you will be advised accordingly.

### **Staff training**

The Silver Fox Café will ensure that all employees handling CCTV images or recordings are trained in the operation and administration of the CCTV system and on the impact of the laws regulating data protection and privacy with regard to that system.

## **Implementation**

The Silver Fox Cafés Data Protection Officer Malcolm Ward, is responsible for the implementation of and compliance with this policy and the operation of the CCTV system which he will conduct a regular review of the Company's use and processing of CCTV images to ensure that at all times it remains compliant with the laws regulating data protection and privacy. Any complaints or enquiries about the operation of the Company's CCTV system should be addressed to Malcolm Ward on the above contact details on page 1

## **Data Protection**

The Silver Fox Café will process the personal data collected in connection with the operation of the CCTV policy in accordance with its data protection policy and any internal privacy notices in force at the relevant time. Inappropriate access or disclosure of this data will constitute a data breach and should be reported immediately to The Silver Fox Cafés Data Protection Officer Malcolm Ward in accordance with The Silver Fox Cafés data protection policy. Reported data breaches will be investigated and may lead to sanctions under The Silver Fox Cafés disciplinary procedure.

## **Your data protection rights**

Under data protection law, you have the right to ask for copies of your personal data. You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. You have the right to ask us to erase your personal data in certain circumstances. You have the right to ask us to restrict the processing of your personal data in certain circumstances. You have the right to object to the processing of your personal data in certain circumstances. You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances. When we use consent as our lawful basis you have the right to withdraw your consent. To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

## **How to complain**

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice. If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office  
Wycliffe House  
Water Lane.  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113 Website: <https://www.ico.org.uk/make-a-complaint>

## **Finally**

In the event we have something incorrect on this document, firstly our sincere apologies and we are grateful if you could bring it to our attention for discussion or alteration.

Keep safe and we hope you've enjoyed your experience at The Silver Fox Café

Dated July 2023

Revise due date July 2024

Up-dated 25<sup>th</sup> March 2024

Up-dated 4<sup>th</sup> April 2024

Page 6 of 6