



**CMAL**

Caledonian Maritime Assets Ltd  
Stòras Mara Cailleannach Eta

Closed Circuit  
Television System  
Privacy Notice

Version 1.0



<b>Date of Review</b>	<b>Reviewed By</b>	<b>Version</b>
17 May 2018	David McHardie	V 1.0

## 1. Introduction

Caledonian Maritime Assets Limited (CMAL) owns or leases the ferries, ports and harbours and infrastructure necessary for vital ferry services serving the West coast of Scotland and the Clyde Estuary.

We are wholly owned by the Scottish Government with Scottish Ministers the sole shareholders.

The Caledonian Maritime Assets Limited Board has an executive management team and supporting staff at headquarters in Port Glasgow.

We aim to provide efficient, cost-effective and safe ferries, harbours and port infrastructure for operators, communities and users in and around Scotland.

- i. Maintaining, improving and enhancing assets such as vessels and the land and property around piers and harbours
- ii. Seeking extra investment to invest in ferries and harbour facilities, making a real difference for people and businesses using these life line services
- iii. Working with stakeholders within Scotland and the wider maritime community to be acknowledged as the principal provider of the most cost-effective yet innovative ferries and port infrastructure to the benefit of the communities we serve.

Under the General Data Protection Regulation (GDPR), CMAL is required to provide information about how personal information will be processed.

This privacy notice explains how CMAL uses images captured by Closed Circuit Television (CCTV).

## 2. What Information is Collected?

CMAL collects images using CCTV at each of our harbour, slipway and non-statutory marine facility locations.

## 3. How will my information be used?

The primary purpose of the CMAL CCTV system is to assist CMAL and their contracted harbour operators, CalMac Ferries Ltd (CFL) to fulfil their liability obligations for their customers, staff, contractors and other persons and enhance navigational safety within our harbour areas.

Both organizations must also be in a position to respond to threats and emergencies, whether these events manifest as an incident, medical crisis or harbour crime. Whilst not a 24/7 monitored system the CCTV has the capability of generating alarms and notifications in accordance with pre-set criteria and in doing so provide the means for CMAL and CFL to become aware of incidents and to provide an appropriate response, particularly when out of hours or at unstaffed locations.

Therefore, CMAL and CFL, local communities and other harbour users benefit from a number of immediate and tangible benefits gained from the installation of local harbour CCTV systems and CCTV images that are collected for the purposes of:

- iv. Monitoring site health and safety where appropriate to do so, ensuring a safe environment for the public, staff, any third parties and other harbour users;

- v. Improving the availability and detail of live information capable of being accessed remotely by RoRo Ferry Masters to help inform their decision making process to optimise ferry services;
- vi. Enabling appropriate safety and operational management of harbours, particularly at unstaffed locations;
- vii. Supporting general employment purposes, which may include employees of organisations contracted to supply services by CMAL, specifically lone workers and the command and control and investigation of incidents;
- viii. Meeting CMAL's statutory duties where CMAL is the harbour authority;
- ix. Safeguarding the legitimate interests of the organisation and individuals whilst supporting management and training operations;
- x. Meeting CMAL's statutory duties where CMAL is the local lighthouse authority by enabling remote monitoring of navigational aids and lights;
- xi. Assisting with the prevention and detection of crime and other matters such as missing person enquiries;
- xii. Assisting with the apprehension and prosecution of offenders;

Many of these functions and purposes are based in law and therefore the majority of processing is necessary for a task carried out in the public interest or in the exercise of official authority vested in the controller. Occasionally, processing will be carried out in the legitimate interests of the controller as described above, and processing may also be carried out where it can be justified using one or more of the exemptions under data protection law, in particular those relating to crime, taxation and national security.

#### **4. Will my information be passed to anyone else?**

Staff responsible for the functions and purposes listed above will process the information collected by the CCTV.

CMAL uses data processors to manage and administer the system on a day to day basis. Data processing agreements are place with all organisations that process personal information on CMAL's behalf, which require processing to be carried out within the EEA, or for appropriate safeguards to be in place where it is carried out by an international organisation. Images are not transferred internationally.

We will never pass images to any other third party, unless there is a statutory requirement to do so or the processing is otherwise lawful.

#### **5. What happens when my information is no longer required?**

CCTV images are retained for 30-days, following expiry of which they are automatically overwritten by the system. In exceptional circumstances, images may be retained for longer where they are used for certain purposes described above, for example where they are used as evidence in an investigation. In these cases, the images will be retained in accordance with CMAL's retention schedules.

## 6. Additional Rights

Under the GDPR, you have a number of rights in relation to your personal information. You have the right to:

- i. request access to your personal information;
- ii. request rectification of your personal information which means you are able to have inaccurate personal information corrected without undue delay;
- iii. request erasure of your personal information when certain conditions apply;
- iv. restrict processing under certain circumstances;
- v. object to processing;
- vi. data portability in some circumstances.

Requests that relate to rectification, erasure or restricting processing will be passed to any recipients of your personal information. Details of recipients can be found under the section *Will My Information be Passed to Anyone Else?*

There may be occasions when CMAL is unable to comply with requests to exercise the rights above. Should this apply to a request you make, it will be explained to you why CMAL is unable to comply with the request and any options available to you.

Where your personal information is being processed using consent, one further right is the right to withdraw your consent at any time. You can find out how your personal information is being lawfully processed under the section *How Will My Information Be Used?*

## 7. Complaints

Should you be unhappy with the way in which CMAL have processed your personal data, you have the right to lodge a complaint with the Information Commissioner, who regulates data protection legislation across the UK. Their contact details can be found at <https://ico.org.uk/>.

## 8. Contact Details

CMAL is the Data Controller (or Controller) for information collected and processed for the purposes of managing stakeholder lists. Website: <http://www.cmassets.co.uk/>

If you have any queries regarding any of the information in this privacy notice, in the first instance please contact:

Data Protection Officer  
Caledonian Maritime Assets Ltd  
Municipal Buildings  
Fore Street  
Port Glasgow  
PA14 5EQ  
Tel: 01475 749920  
Email: [dpo@cmassets.co.uk](mailto:dpo@cmassets.co.uk)