

FACIAL RECOGNITION PRIVACY NOTICE

This notice is an addendum to our more general privacy notice found on our website and tells you how we use biometric personal information collected at our venue. Please read all of our privacy notices prior to visiting our venue. This privacy notice tells you how we, Rowans will collect and use your personal data for the delivery of services to you.

Who are we?

Parkstock Ltd t/a Rowans (hereafter referred to as Rowans) is a leisure venue with a licence to serve alcoholic beverages.

If you visit our venue we will collect biometric data about you via facial recognition cameras so we may determine whether you can enter the premises as a result of past behaviour. By visiting our venue and observing the facial recognition signage located outside and in and around our premises we will take this as your affirmative consent to our very limited usage of facial recognition cameras by entering.

The personal data we collect will be used for the following purposes:

- The prevention and detection of crime.
- The prevention and detection of antisocial conduct.
- Refuse access to any person previously ejected for antisocial conduct.
- Maintain a safe and family friendly environment.

What are the purposes of processing my personal data?

Consent is not required for Rowans to process your personal data however by entering our venue you are giving us permission to process your personal data specifically for the purposes identified. However, please take note we rely on legitimate interest as the justification for the use of facial recognition cameras with human intervention.

The legitimate interests for the processing are due to the fact that there is a compelling justification for us to protect our customers, staff and business assets from unlawful acts. Our Legitimate Interest Assessment is as follows:

As a licenced premises Rowans must always work towards meeting the four main objectives of the Licensing Act 2003 which are:

1. The prevention of crime and disorder.
2. Public safety.
3. The prevention of public nuisance.
4. The protection of children from harm.

It is our legitimate interest to prevent antisocial behaviour and crimes against our clients, property and staff rather than just belatedly capture on CCTV crime that has taken place and report to the Police.

The processing of personal data and special category data is necessary to achieve our legitimate purpose as it allows us to quickly and accurately identify individuals who are reasonably suspected of being banned, and to take reasonable and proportionate action in the circumstances. Without processing information in this way, we would be unlikely to effectively identify such persons (as they attempt to enter our venue), be less likely to prevent unlawful acts, and therefore more likely to experience crime, even with existing tactics including security staff and/or CCTV monitoring. Reporting crime to the Police is similarly less effective than the use of facial recognition cameras as this is post event rather than preventative.

We balance our legitimate interest against the individual's interests, rights and freedoms. We distinguish those individuals reasonably suspected of having committed unlawful acts from all other persons entering our venue by the use of a banned persons database and Facial Recognition Alerts. There is always human involvement to verify any possible match between an individual entering our properties and the facial recognition image. In the event of a confirmed match, we may take reasonable and proportionate action in the circumstances.

The recipients or categories of recipients of the personal data include our staff and may include third parties who assist us with the prevention and detection of unlawful acts, including the Police.

Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.

The above right can be exercised by contacting Rowan's Data Protection Officer (see contact details below).

Why does Rowans need to collect and store personal data?

In order for us to provide you with a service, in any event, we are committed to ensuring that the information we collect and use is necessary and appropriate for this purpose and does not constitute an invasion of your privacy.

Will Rowans share my personal data with anyone else?

Personal data will only be shared with third parties such as the Police upon request.

How will Rowans use the personal data it collects about me?

Rowans will process (collect, store and use) the information you provide in a manner compatible with the UK's General Data Protection Regulation (UK-GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

Can I find out the personal data that the organisation holds about me?

Rowans, at your request, can confirm what information we hold about you and how it is processed. If Rowans does hold personal data about you, you can request the following information:

- Identity the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the Compliance Officer, who deals with our data protection.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Rowans or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored.
- Details of your personal data that has been processed by exercising your right of access.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

How long are facial images retained for?

We retain facial images for a period of 30 days from the date of an incident, following which they are deleted. Facial images of banned persons are held indefinitely.

Complaints and exercising of rights

In the event that you wish to make a complaint about how your personal data is being processed by Rowans, how your complaint has been handled or to exercise your rights as a data subject, please contact the Rowan's Data Protection Officer via email at: info@rowans.co.uk

You also have the right to lodge a complaint directly with the supervisory authority via the contact details below:

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Email: casework@ico.org.uk, Telephone: 0303 123 1113

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

The most recent changes to this Privacy Notice were made on: 29 January 2024