

Privacy Notice - MSite Face Mini

Essex Services Group Ltd. (ESG) is a 'data controller' for the purposes of the Data Protection Act 2018 ('DPA 2018') and the UK General Data Protection Regulation ('UK GDPR').

References in this Privacy Notice to 'ESG', 'we', 'us' or 'our' mean 'Essex Services Group Ltd.'.

We are registered with the Information Commissioner's Office (ICO); registration number ZA443400. Our Data Protection Officer (DPO) can be contacted via: dataprotection@mooreclear.com

This Privacy Notice contains important information about who we are, how and why we collect, store, use and share personal information, including the facial images, of the staff, contractors and sub-contractors employed by ESG, whose personal data are processed on the MSite Face Mini access control system.

This Privacy Notice also tells you about your data subject rights and on how to contact us and/or the UK Regulator (the 'ICO') in the event you have a complaint. You can contact us by using any of the methods shown below in the section below entitled "How Do I contact you?".

We are committed to respecting and protecting your privacy. Should we ask you to provide certain information by which you can be identified, then you can be assured that it will only be used in accordance with this Privacy Notice.

What data do we collect?

Personal information

In this Privacy Notice, the term "personal information", means data relating to you that allows us to identify you either directly, or in combination with other information we may hold.

Special Categories of Personal Data

The UK GDPR defines 'special categories of personal data' as information about a person's race and ethnicity, religious or philosophical beliefs, trade union memberships, political opinions, genetic data, biometric and health data, and information concerning a natural person's sex life or sexual orientation.

We will collect the following personal information from you for the purpose of using MSite Face Mini:

- First name
- Last name
- Email Address
- Phone number(optional)
- Facial image (biometric data)

How do we use your information?

General

Facial recognition will be used to register your attendance at a designated site or location enabling automated background checks to be conducted that will verify your identity and validate your right to access a particular location or site. Access rights are linked to a your profile on MSite Face Mini.

Access rights are linked to your profile stored on MSite Face Mini. Facial recognition will be used to register an individual's attendance at a location or site enabling automated background checks to be conducted that will verify the person's identity and validate their right to access a particular location or site. Checks against other qualifying criteria can be carried out (as required). For example, has the person seeking access to the location or site completed the required site induction training.

Access to sites and offices will be granted without the need to use facial recognition technology. This requires a PIN code to be sent to the MSite Workforce App stored on our mobile phone. The PIN code is keyed into the MSite Face Mini keypad to enable access to a specific location or site.

What is our legal basis for processing your data?

We rely on the lawful basis of 'legitimate interests' to process your personal data and special category personal data i.e. your facial image. Those legitimate interests are defined as follows:

- To verify your identity and validate your right to access a particular location or site.
- To prevent unauthorised people from accessing a particular location or site.
- To comply with applicable laws and regulations i.e. Health and Safety & Work Act 1974.
- To contact you for administrative or operational reasons i.e. to advise you about site closures.
- To provide a dashboard of 'LIVE' worker numbers from each site or location.
- To safely evacuate workers from any site or location in the event of an emergency.
- To meet statutory or contractual requirements.

Your facial image is classed as biometric data and therefore identified as 'special category personal data'. The 'condition' relied by ESG for processing special category personal data is Article 9.2 (b) of the UK GDPR insofar as our "processing of your facial image is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller [ESG] or of the data subject [you] in the field of employment and social security and social protection law".

How do we collect your information?

Your information is collected directly from you via an enrolment form that can be completed either online or at a designated site or office. Your information is subsequently uploaded to MSite Face Mini.

Who do we share your information with?

Your personal information will be shared with MSite who act as a data processor on behalf of ESG.

We will not sell, distribute, or lease your personal information to a third party unless it's necessary for us to fulfil our obligation to you, we have your permission to do so, or we are required to disclose your personal information to a competent authority e.g. the police, or regulatory body e.g. the ICO.

How long do we keep your information?

We will retain your personal information in a live environment for as long as necessary to fulfil the purpose(s) for which it was collected, typically this will be 7 years. We may keep your data, including your facial image, for longer periods to establish, exercise, or defend our legal rights and yours.

We apply a data retention criteria that takes account of our legal obligations, balancing these with what is considered to be reasonable where retention is determined by ESG.

Where there is a need to retain your personal information for longer, it is securely archived, and appropriate safeguards are applied. For instance, access to your data is restricted.

International data transfers

All personal information is stored securely in Amazon Web Services (AWS) in the United Kingdom.

Security of your personal data

We will use appropriate technical and organisational measures to protect your personal information against unauthorised or unlawful processing and against accidental loss, destruction, or damage.

Additionally, we have put in place appropriate security procedures and access control measures to ensure the confidentiality of special categories of personal data e.g. your facial image.

What are my data subject rights?

We support your data subject rights in relation to the processing of your personal information under the Data Protection Act 2018 and the UK GDPR, including your:

- right to be informed (chiefly via this policy)
- right of access
- right to rectification
- right to erasure
- right to restrict processing
- right to data portability
- right to object
- rights related to automated decision-making including profiling.

You can exercise any of these rights by contacting us using any of the methods shown below in the 'How do I contact you?' section.

You can request a copy of the personal information we hold about you, including your facial image, by using any of the methods shown below in the 'How do I contact you' section.

We will respond to any request you make as quickly as possible. Usually, this will be within one month of receiving your request.

Controlling your personal information

Withdrawing my consent

Where we process your personal information based on your consent, you may withdraw your consent at any time. You can do this by contacting us at any time by writing to the address shown below in the 'How do I contact you?' section or by emailing: mmorgan@esglimited.com

Updating my information

You may request us to correct, update, or delete your personal information by contacting us using any of the methods shown below in the 'How do I contact you?' section.

Making a complaint to us

We hope you will never have the need, but if you do want to complain about our use of your personal information, or our facilitation of your data subject rights, you can contact us using any of the methods shown below in the 'How do I contact you?' section.

Our Data Protection Officer will investigate your complaint and provide you with an appropriate response as quickly as possible.

Making a complaint to the Information Commissioner

You can lodge a complaint with the Information Commissioner at any time. For instance, if you are unhappy with the way in which we are processing your information, or we have failed to facilitate your data subject rights. The Information Commissioner can be contacted as follows:

By post: Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

By phone: 0844 496 4636 (local rate)

Further information about your data subject rights and how to complain to the ICO can be found [here](#).

How do I contact you?

You may contact us using any of the following methods:

By post: Data Protection Officer
Essex Service Group Ltd.
Viking Business Centre
Danes Road
Romford
RM7 0HL

By email: mmorgan@esglimited.com

Changes to this Privacy Notice

We continuously review the content of our Privacy Notice to ensure it accurately reflects what we do with your information, or we may change this Privacy Notice to reflect changes in the law. We recommend that you check this page regularly to keep up to date.

This Privacy Notice was last updated in October 2023.