

## Your Data – SPT and CCTV

### Where is SPT recording footage using CCTV cameras?

As you may be aware from the cameras and signage, SPT operates CCTV systems at:

- (a) Each of its Subway Stations and associated car parks, and our Govan Depot;
- (b) Seaward Street Store, Glasgow;
- (c) 131 St Vincent Street, Glasgow; and
- (d) Buchanan, Hamilton, Greenock and East Kilbride Bus Stations, and Govan and Partick Bus Interchanges.

Our cameras will operate so that they capture images relevant to the purposes for which the systems have been established, and which are set out below.

Cameras will not be hidden from view and signage informing the public of the presence of the system and its ownership will be prominently displayed.

In addition to the above, SPT also have the right to use Body Worn Video (“BWV”). Any images captured by BWV will be treated in the same manner as CCTV images.

### What does SPT use the CCTV footage from these locations for and when will we share the footage?

We use and share the images that we capture via CCTV systems for the following purposes:

- (i) the prevention, detection and investigation of crime;
- (ii) in the interests of public safety and security;
- (iii) the management and monitoring of health, safety and security;
- (iv) to allow SPT and third parties whom it expressly authorises, such as its external legal advisors, loss adjusters, insurers and insurance brokers, to investigate, defend and otherwise process and respond to any reports of loss, injury or damage on premises where SPT is responsible;
- (v) our management and administrative purposes as an employer and in the interests of safe, secure, effective and efficient provision of transport and services to the public;
- (vi) to enable us to comply with any legal requirements, pursue the legitimate interests of SPT and protect our legal position; and
- (vii) to enable SPT managers with involvement in disciplinary processes within SPT where CCTV footage shows gross misconduct, unlawful activity or behaviour which puts others at risk to investigate and take appropriate action.

CCTV images may also be:

- (viii) used in relation to substantive health and safety matters but should not be used for the routine monitoring of staff;
- (ix) disclosed to the police and any other criminal/regulatory investigation bodies/agencies such as the Crown Office and Procurator Fiscal Service, the Office of the Rail Regulator and the Health and Safety Executive, in relation to specific investigations/prosecutions, provided that SPT is satisfied that legitimate grounds exist for doing so;
- (x) released to government agencies able to compel disclosure if we receive an appropriate request;
- (xi) released to courts and employment tribunals in relevant cases and may be shared with external legal advisers in these cases;
- (xii) released in response to an order from a court/tribunal with competent jurisdiction to make such an order; and
- (xiii) released (without consent) in response to investigations by external regulators such as Audit Scotland, the UK and Scottish Information Commissioners and Scottish Public Services Ombudsman.

#### **What if I am identifiable in the footage?**

If you are identifiable in the CCTV footage, then it is your personal data under the GDPR. We have a special part of our website dedicated to the new rights that data subjects have under the GDPR. You can find that here: