

# **FAIR PROCESSING AND PRIVACY NOTICE**

## **Building Access Fobs - Electronic**

### **Who we are and our contact details**

Leicestershire Fire and Rescue Service (LFRS) [us/we/our] are a Public Authority and the Data Controller for determining the purpose and means of processing your personal data. Personal data means any information about a living individual who could be identified. You can contact us:

**Address:**

The Data Protection Officer,  
Information Governance Department,  
Leicestershire Fire and Rescue Service Headquarters,  
12, Geoff Monk Way,  
Birstall,  
Leicester

LE4 3BU

**Email:**        **dpo@leics-fire.gov.uk**

**Telephone:**  0116 210 5555

Or via our **Social Media Channels** – See our Website Homepage for links:

[Data Protection, Your Privacy & Website Cookies \(leics-fire.gov.uk\)](https://www.leics-fire.gov.uk/Data-Protection-Your-Privacy-Website-Cookies)

## **Why we collect your personal data**

We collect and process your personal information relating to access to Service sites (e.g. car park barriers), buildings, common areas and individual rooms. This means we are able to determine when and where the fob has been used and track locations you have accessed. Where a fob is issued to a named individual it is your personal data we are processing. The primary purposes of processing are:

- Site and building security including monitoring and audit;
- Building evacuation – to know who is in our buildings when an alarm is activated and to ensure they are accounted for in the event of evacuation;
- To support investigations including Health and Safety events and complaints made against the Service or any person who has accessed our sites and buildings; and
- Where there is a legitimate need by a Service manager to review the use of an access fob in relation to locations accessed. Note, legitimate need is satisfied by applying a three part test: Purpose test – is there a legitimate interest behind the processing? Necessity test – is the processing necessary for that purpose? Balancing test – is the legitimate interest overridden by the individual’s interests, rights or freedoms?

## **The categories of individuals**

Employees

Temporary employees including Intern and Agency

Volunteers

Apprentices

Partner Authorities/Organisations

Suppliers / Service Providers

Community

Consultants

Contractors

## **The personal data we collect**

This personal information may include but is not limited to your:

- First name and surname;
- Service number;
- Department worked in (LFRS);
- Sole trader name (External supplier/contractor)
- Allocated fob identification number;
- Access location permissions (security settings); and
- Description of locations accessed by date/time and fob identifier – your location information.

## **Our lawful reasons for processing your personal data**

We are not relying on your consent (permission) to collect and process your personal information, instead we will use our legitimate interest under the UK General Data Protection Regulation (GDPR) Article 6(1)(f).

Our legitimate interests must be balanced against your interests. Our interests are our purposes for processing i.e. why we collect your personal data, what we use it for and who we may share it with. We cannot maintain the security of our sites, and buildings, and conduct investigations into Health and Safety events or complaints without using devices such as fobs to help us track access and egress of people. Equally the records of your personal data processing support your interests, rights and freedoms during event or investigations, or complaints made against you.

## **Who we share your personal data with**

We may share information and records of non-employees with relevant third parties when there is a legal basis to do so, this includes their employers or agents.

We may share appropriate personal information relative to a claim with our protection provider (Fire & Rescue Indemnity Company Limited), their managers and our insurers. We may also share your personal information with other people and organisations in connection with any legal claim made against us.

## **How we store your personal data and how long we keep it**

Your personal information is securely stored at our premises with access limited to only those who administer the system.

We keep records of fob use, which includes your personal information, for the duration of your employment or contract (if not employed by us), and for a further six years after. When we no longer need to keep your personal information, we will delete it or destroy it securely.

## **Your individual rights**

In general, you have the right to request that LFRS:

- Provides you with details of your personal data held, gives access to you and where appropriate provides you with a copy of your personal information
- Corrects any errors in your personal data we find during our business processes, or are informed of and restrict processing of your personal data until completed
- Considers your objection to the processing of your personal data and depending upon the service and legal basis, stops all or some of that processing. "Processing" means the collecting, storing, amending, disclosing, sharing, archiving and destruction of your data
- Erases your personal information, depending on the service and legal basis deletes all or some of your personal data
- Withdraw your consent for us to further process your personal data, if consent is used by us as the legal basis for the service
- Informs you any of automated decision making, including profiling for the service (Note: Please be advised we do not currently use automated decision making)

Where possible we will try to meet your request, but we may need to retain or process information to comply with a legal duty or our policies and procedures.

## **Data Protection information, requests and concerns**

If you would like to exercise your individual rights or discuss anything in this Privacy Notice, please contact our Data Protection Officer (DPO) – See top of page 1.

If you have concerns about the use of your personal data we encourage you first to contact our DPO as concerns can often be resolved very quickly. If you remain concerned then the Information Commissioners Office is an independent body set up to uphold information rights in the UK. They can be contacted through their website: [www.ico.org.uk](http://www.ico.org.uk) or their helpline on 0303 123 1113, or in writing to:

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

For more information about your rights: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protectionregulation-gdpr/individual-rights/>

To complain to the Information Commissioner's Office:  
<https://ico.org.uk/concerns/>

### **Review**

Revised September 2023.

Next review September 2024.