

Privacy Notice

Vehicle Camera System

Article 13, UK General Data Protection Regulation

This notice explains how Amvale Medical Transport Ltd uses personal information recorded by the cameras fitted in its vehicles. It is written for patients we transport, escorts and family members travelling with them, members of the public captured incidentally, and Amvale staff. The notice is issued under Article 13 UK GDPR.

1. Who is the Data Controller

Amvale Medical Transport Ltd, company number 04502825, is the Data Controller. This notice also applies to any associated company within the Amvale group whose operations are within scope.

Registered address	Unit 1 C/D, South Park Industrial Estate, Birkdale Road, Scunthorpe DN17 2AU
ICO registration	Held. Amvale Medical Transport Ltd is registered with the Information Commissioner's Office.

2. Data Protection Officer

Amvale has appointed The Privacy Worx Ltd as its outsourced Data Protection Officer.

Email	dpo@theprivacyworx.com
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3. What personal information we collect

The camera system records:

- A view of the road ahead of the vehicle (road-facing camera).
- A view of the vehicle interior (cabin-facing camera, using infrared light at night so the interior is recorded in darkness). This inevitably captures patients, escorts, staff and any others in the vehicle.
- Technical event data from a Driver Monitoring System detecting distraction, drowsiness, fatigue, eyes off the road and mobile phone use, together with the surrounding video clip.
- Metadata: vehicle identifier, time, GPS location, and driver attribution (established by keyfob, not by facial recognition).

Audio recording is not currently enabled and the cameras do not capture sound. Face identification is switched off and cannot be enabled again without a formal review by the DPO. Because Amvale is a patient transport operator, cabin recording will routinely include information about patients' health; this is special category data under Article 9 UK GDPR.

4. Why we collect it – purposes

- To keep patients, escorts, staff and other road users safe.
- To investigate collisions, incidents in or around the vehicle, complaints and safeguarding concerns.
- To defend Amvale against false or exaggerated insurance claims.
- To support driver coaching and post-incident learning.
- To meet Amvale's contractual and regulatory obligations to healthcare commissioning bodies.

5. Our lawful basis

Article 6 UK GDPR:

- Article 6(1)(f) – legitimate interests – is our primary basis. Our legitimate interests are those set out at section 4.
- Article 6(1)(b) – performance of the employment contract – also applies to staff data.

Article 9 UK GDPR (for the special category data captured incidentally):

- Article 9(2)(h) – processing necessary for the provision of health or social care.
- Data Protection Act 2018 Schedule 1 Part 1 Paragraph 2 (health or social care purposes). Amvale staff are bound by contractual confidentiality equivalent to that owed by a health professional.
- For extracted footage used or disclosed for related purposes (safeguarding, unlawful acts, regulatory matters, insurance claims), the appropriate condition in DPA 2018 Schedule 1 Part 2 is relied on case-by-case, and an Appropriate Policy Document is maintained by our DPO.

6. Who we share it with

Access at Amvale is limited to named individuals who need it for the purposes above. The control office sees only vehicle locations on a map, not any video. Extracted footage may be shared, case-by-case, with:

- The police or other competent authority in connection with a criminal investigation.
- Our insurers and legal advisers in connection with claims or legal matters.
- NHS Trusts, Integrated Care Boards or other commissioning healthcare bodies for a patient-related complaint, incident review or safeguarding matter.
- Safeguarding partner organisations.
- Regulators (for example the Care Quality Commission).
- You or another data subject on request under UK data protection law (with faces and identifying information of other people obscured before disclosure where reasonably practicable).

Each disclosure is recorded in an internal log.

7. International transfers

The camera system is provided by Geotab. Amvale's footage is stored in the European Union region of Google Cloud Platform. Geotab Inc. (Canada) is our data processor. Geotab uses a small number of US-based supporting services (for example Salesforce as its customer relationship management system) which may hold user contact information, vehicle identifiers and GPS location – but not the camera footage itself.

Where personal information is transferred outside the UK, it is safeguarded by the UK International Data Transfer Addendum to the Standard Contractual Clauses ("SCCs") incorporated in our processor contract with Geotab, together with encryption in transit and at rest and role-based access control. A copy of the SCCs / IDTA and a Supplementary Transfer Assessment recording residual risk as LOW are available on request from the DPO.

8. How long we keep it

- Routine footage: 30 days from capture. After that the footage is deleted through the platform's scheduled deletion process.
- Extracted footage: up to 12 months from extraction, unless a longer period is required for ongoing litigation, an open insurance or regulatory matter, an active police enquiry, a coronial investigation or another legal obligation.
- Records of extractions and disclosures: six years, then destroyed.

9. Automated decision-making

The Driver Monitoring System uses machine vision to detect the five behaviours listed at section 3. It is not used to make decisions about individuals on its own. Every DMS event is reviewed by a manager, taking into account the surrounding circumstances and the driver's own account. There is no automated decision-making producing legal or similarly significant effects within the meaning of Article 22 UK GDPR.

10. Your rights

Under UK data protection law you have the following rights in respect of personal information about you that may be recorded by the system:

- Right to be informed (Article 13) – this notice.
- Right of access (Article 15) – you can ask us to confirm what personal information we hold about you and to provide a copy.
- Right to rectification (Article 16) of associated information that is inaccurate.
- Right to erasure (Article 17) in the circumstances described in that Article, in particular after the applicable retention period.
- Right to restrict processing (Article 18) while a specific matter is being considered.
- Right to object (Article 21) to the processing on the ground that it relies on legitimate interests. Amvale will consider any objection and respond in writing.

- Right to complain to the Information Commissioner's Office (Article 77).

The right to data portability (Article 20) does not apply because the processing is not based on consent or contract in a way that engages Article 20, and camera footage is not personal data "provided by" the data subject in the sense Article 20 requires.

To exercise any right, please contact the DPO at dpo@theprivacyworx.com. We will respond within one month of receiving your request.

11. Whether provision of information is required

Being visible on the vehicle camera system is a consequence of being in an Amvale vehicle. There is no separate obligation on patients, escorts or members of the public to "provide" personal data to Amvale, and no consent is asked for. Vehicle signage informs anyone entering the vehicle that recording is in operation. If you have concerns about being recorded during a patient transport, please raise this with the commissioning healthcare body making the transport arrangement, as it may affect the arrangements available.

12. Complaints

If you are unhappy with how Amvale has handled your personal information you can contact the DPO at dpo@theprivacyworx.com. You also have the right to lodge a complaint with the Information Commissioner's Office.

Address	Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
Helpline	0303 123 1113
Website	ico.org.uk

13. Changes to this notice

If the camera system or the processing changes in any material way, this notice will be updated and re-issued before the change takes effect. The version, date and last review date are shown at the foot of every page.