

# Sodexo UK Prison Visitors/Website Visitors

## Privacy Policy HMP Northumberland

Sodexo Limited of One Southampton Row, London WC1B 5HA is the Data Controller.

We are committed to protecting and respecting your privacy.

This policy together with our terms of use sets out the basis on which any personal data We collect from you or others, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how We will treat it.

### Information We may collect

We may collect and process the following data about you:

- If you contact us or a resident, We may keep a record of that contact.
- If you intend to visit us, we may request and keep details of your visit to any of our sites including, but not limited to, information required to confirm your identity including, name, date of birth, ID documentation, facial images and finger scan images ( biometric data); information required to confirm the nature of your relationship with the person you are seeking to visit; information about searches of your person carried out, contact information including your address, email and contact telephone numbers. This may include information about other family members ,any welfare related information and organisation details if visiting on behalf of an organisation..
- Video visits may also include audio and visual recordings.
- We will collect images from Close Circuit Television systems, both fixed and mobile.
- Details of transactions you carry out through our site or by telephone and of the fulfilment of your visit or request.
- The information collected includes special category data.

### Legal ground for processing and uses made of the information

- We process your personal data for any of the following reasons : -
- We are a Competent Authority for the purposes of Law enforcement personal data in relation to the running of this prison. The main basis for processing your personal data relates to law enforcement processing, this is for the purposes of the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties
- Personal data within the scope of GDPR may be processed because it is necessary for compliance with a legal obligation to which We are subject,
  - in order to protect your or another individuals' vital interests.
  - or because, in specific circumstances, you have given us consent to do so.
  - It is in the public interest
- It is for Sodexo's legitimate interests except where such interests are overridden by your interests or fundamental rights and freedoms.

### We use information held about you in the following ways:

The main processes include:

- Prison visits (including virtual visits) ; access to prison premises ; phone calls ; family support ; attendance

at case conferences ; compliance with Prison Rules ; public health

- To ensure that we deliver appropriate levels of security, safety, decency and rehabilitation in our prisons.
- To prevent crime or detect crime /law enforcement purposes (including national and public security)
- To carry out our legal obligations
- To ensure that content from our site is presented in the most effective manner for you and for your computer.
- To allow you to participate in interactive features of our service when you choose to do so.
- To notify you about changes to our service.

## IP addresses and Cookies

Information about how we use IP addresses and Cookies is set out in the Website Terms of Use.

## Where We store your personal data and Security

The data that We collect from you will not be transferred to, and stored at, a destination outside the UK, except in exceptional circumstances where it has been approved by the MOJ.

We hold prisoner and visitor data in accordance with Ministry of Justice requirements. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Once We have received your information, We will use strict procedures and security features to try to prevent unauthorised access.

## Data accuracy and storage limitation

Sodexo will keep personal data that is processed accurate and, where necessary, up to date. Also, We only keep personal data for as long as necessary for the purposes for which it is processed (in accordance with HMPPS guideline). For prison visits this is usually 6 years. Sodexo will act upon the instructions of its clients or as required by applicable law in order to assist them in complying with this obligation.

## Disclosure of your information

We may disclose your personal information to third parties:

If We are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety and welfare of other or there is another lawful basis to do so.

This includes exchanging information with other companies and organisations for the purposes of crime prevention, security, fraud protection and credit risk reduction.

The usual recipients of data are: HMPPS/MOJ, Police, Local Authorities, Social Care agencies and NHS.

## Your rights

Sodexo is committed to ensure protection of your rights under applicable laws. Different rights apply depending on whether the personal data is within the scope of the GDPR or law enforcement regulations.

You will find below a table summarizing your different rights:

	GDPR	Law enforcement
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<b>Right of access</b>	You can request access to your personal data. You can request access to your personal data. This means you can request a copy of your personal data and other information about how it is being used.	You can request access to your personal data. This means you can request a copy of your personal data and other information about how it is being used.
<b>Right to rectification</b>	You can request that inaccurate is corrected or to have an incomplete record completed.	You can request that inaccurate is corrected or to have a record completed where it is inaccurate because it is incomplete.
<b>Right of erasure</b>	<p>You can request the deletion of your personal data in cases where:</p> <ul style="list-style-type: none"> <li>(i) the data is no longer necessary.</li> <li>(ii) you choose to withdraw your consent.</li> <li>(iii) you object to the processing of your personal data by automated means using technical specifications.</li> <li>(iv) your personal data has been unlawfully processed.</li> <li>(v) there is a legal obligation to erase your personal data.</li> <li>(vi) erasure is required to ensure compliance with applicable laws.</li> </ul>	<p>You can request the deletion of your personal data in cases where</p> <ul style="list-style-type: none"> <li>(i) the processing of the personal data would infringe any relevant part of the 6 data protection principles, or the requirements for archiving or processing sensitive personal data.</li> <li>(ii) we have a legal obligation to erase the data.</li> </ul>
<b>Right to restriction of processing</b>	<p>You can request that processing of your personal data be restricted in the cases where:</p> <ul style="list-style-type: none"> <li>(i) you contest the accuracy of the personal data.</li> <li>(ii) Sodexo no longer needs the personal data, for the purposes of the processing.</li> <li>(iii) you have objected to processing for legitimate reasons.</li> </ul>	<p>You can request that processing of your personal data be restricted in cases where:</p> <ul style="list-style-type: none"> <li>(i) a request for erasure has been made, but the data is required for evidence and cannot be erased.</li> <li>(ii) A request to correct inaccurate data is made but the data is required for evidence and cannot be corrected.</li> </ul>
<b>Right to data portability</b>	You can request, where applicable, the portability of your personal data that you have provided to Sodexo, in a structured, commonly used, and machine-readable	This right does not apply

	<p>format and you have the right to transmit this data to another Controller without hindrance from Sodexo where:</p> <p>(a) the processing of your personal data is based on consent or on a contract; and</p> <p>(b) the processing is carried out by automated means.</p> <p>You can also request that your personal data be transmitted to a third party of your choice (where technically feasible).</p>	
<b>Right to object to processing including for the purposes of direct marketing</b>	<p>You may exercise your right to unsubscribe to the processing of your personal data e.g. for the purposes of profiling or marketing communications. When We process your personal data on the basis of your consent, you can withdraw your consent at any time.</p>	This right does not apply
<b>Right not to be subject to automated decisions</b>	<p>You have the right not to be subject to a decision based solely on automated processing, including profiling, which has a legal affect upon you or significantly affects you.</p>	<p>You have the right not to be subject to a significant decision based solely on automated processing unless the decision is required or authorised by law.</p>
<b>Right to lodge a complaint to the competent Supervisory Authority</b>	<p>You have a right to complain to the Information Commissioner, or to seek judicial remedy. The Information Commissioner Office website is <a href="http://www.ico.org.uk">www.ico.org.uk</a> and their address is Wycliffe House, Water Lane, Wilmslow, SK9 5AF.</p>	<p>You have a right to complain to the ICO and to ask the ICO to check whether a restriction or refusal to provide your rights is lawful.</p> <p>You also have a right to seek judicial remedy. The Information Commissioner Office website is <a href="http://www.ico.org.uk">www.ico.org.uk</a> and their address is Wycliffe House, Water Lane, Wilmslow, SK9 5AF.</p>

To exercise your rights, or raise a complaint about how we use your personal data or in relation to how we use cookies, you can contact us by writing to us, Sodexo Justice Services, HMP Northumberland, Morpeth, Northumberland NE65 9XG, or by email to [businesshub.northumberland@justice.gov.uk](mailto:businesshub.northumberland@justice.gov.uk). We will most likely ask you for additional information to identify you and to enable us to deal with your request.

You can also contact our Data Protection Officer, can also be contacted at [DataProtection.UKandIE@sodexo.com](mailto:DataProtection.UKandIE@sodexo.com) or in writing to Sodexo Ltd, One, Southampton Row, London WC1B 5HA.

## Changes to our privacy policy

Any changes We may make to our privacy policy in the future will be reflected in an update of this policy and, where appropriate, notified to you.