

# Terms and Privacy – Sodexo UK Prison Visitors/Website Visitors

## Terms of Use

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## Privacy Policy

Sodexo Limited ("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 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.

For the purpose of the General Data Protection Regulations (GDPR), the data controller is Sodexo Holdings Limited of One Southampton Row, London WC1B 5HA.

## Information We may collect from you

We may collect and process the following data about you:

- If you contact us, We may keep a record of that correspondence
- If you intend to visit us, we may keep details of your visit to any of our sites including, but not limited to, information required to confirm your identity including facial images and finger scan images; information required to confirm the nature of your relationship with the person you are seeking to visit; contact information including your address and contact telephone numbers.
- 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.

## IP addresses and cookies

If you visit our websites, we may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to us or our partners. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

For the same reason, We may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service.

They enable us:

- To estimate our audience size and usage pattern.
- To store information about your preferences, and so allow us to customise our site according to your individual interests.
- To speed up your searches.
- To recognise you when you return to our site.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.

## Where We store your personal data

The data that We collect from you will not be transferred to, and stored at, a destination outside the European Economic Area (EEA). We hold prisoner data in accordance with Ministry of Justice/Scottish Prison Service requirements and Sodexo's data retention policy. By submitting your personal data, you agree to this transfer, storing or processing. 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.

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

We process your personal data for any of the following reasons:-

- We have a lawful reason to do so;
- Because it is necessary for compliance with a legal obligation to which We are subject or where required;
- It is for Sodexo's legitimate interests except where such interests are overridden by your interests or fundamental rights and freedoms;
- In order to protect your vital interests;
- or because, in specific circumstances, you have given us consent to do so.

We use information held about you in the following ways:

- To ensure that we deliver appropriate levels of security and safety in our prisons.
- To prevent crime
- 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.

## 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 of Sodexo Holdings Limited and/or its subsidiary and associated companies, our customers, or others.

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

## Your rights

Sodexo is committed to ensure protection of your rights under applicable laws. You will find below a table summarizing your different rights:

<b>Right of access</b>	You can request access to your personal data. You may also request rectification of inaccurate personal data, or to have incomplete personal data completed.
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	You can request any available information as to the source of the personal data and you may also request a copy of your personal data being processed by Sodexo.
<b>Right to be forgotten</b>	<p>Your right to be forgotten entitles you to request the erasure 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>
<b>Right to restriction of processing</b>	<p>You may 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> <li>(iv)</li> </ul>
<b>Right to data portability</b>	<p>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 format and you have the right to transmit this data to another Controller without hindrance from Sodexo where:</p> <ul style="list-style-type: none"> <li>(a) the processing of your personal data is based on consent or on a contract; and</li> <li>(b) the processing is carried out by automated means.</li> </ul> <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 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>
<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>
<b>Right to lodge a complaint to the competent Supervisory Authority</b>	<p>If you have a privacy-related complaint against us, you may complete and submit the <a href="#">Request/ ComplaintForm</a> or make your complaint by email or by letter in accordance with our <a href="#">Global Complaints/ Request Handling Procedure</a>.</p> <p>If you are dissatisfied with our response, you may then seek further recourse by</p>

	contacting your competent Supervisory Authority- the <u>Information Commissioners Office (ICO)</u> <a href="https://ico.org.uk/">https://ico.org.uk/</a> or the competent court. You can also contact our lead Supervisory Authority, the French Supervisory Authority (the “CNIL”, <a href="http://www.cnil.fr">www.cnil.fr</a> ).
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To exercise your rights, you can contact us by writing to us at the following address: [dataprotection.ukandie@sodexo.com](mailto:dataprotection.ukandie@sodexo.com) or email the Global Data Protection Office at the following email address: [dpo.group@sodexo.com](mailto:dpo.group@sodexo.com) stating your surname, first name and the reason for your request. We will most likely ask you for additional information in order to identify you and to enable us to deal with your request.

Our site may, from time to time, contain links, plug-ins or applications to and from the websites of our group companies, partner networks, advertisers and affiliates. If you follow a link to any of these websites or enable these connections, please note that these websites have their own privacy policies and that We do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

### **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/SPS guidelines and our UK & Ireland Data Retention Policy). 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.

### **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.

### **Contact**

Questions, comments and requests regarding this privacy policy are welcomed and should be posted to the Prison Director.

You may also consult the Sodexo [Global Data Protection Policy which is available on request](#).

### **GOOGLE ANALYTICS**

Our website uses Google Analytics, a web analytics service provided by Google, Inc. (“Google”). Google Analytics uses “cookies”, which are text files placed on your computer, to help the website analyse how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage.

Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google’s behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website.