



Date Created: 17/03/2023
Date Published: 11/04/2023
Version Number: 1.00

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| Service Area: | Green Spaces and Transport Services |
| Work Area: | Fleet Management & Vehicle Maintenance |
| Contact Details: | 01443 863448 Pricel7@caerphilly.gov.uk |
| Privacy Notice Name: | CCBC Vehicle Tracking |
| Description of Privacy Notice: | This Privacy Notice will explain how Caerphilly County Borough Council will use GPS tracking information obtained from our vehicles, where this tracking information can be attributed to a vehicle user. |

How we will use your information

Source and type of information being processed

Categories and Source of personal data obtained

Caerphilly County Borough Council vehicles are fitted with a GPS tracking device that allows us to track that vehicles' journeys. The tracking device will record the information on the vehicle, such as location data, how long the engine is running, how charged the battery is, the speed of the vehicle, how long it stands parked and whether the engine is running whilst stationary. This information will be returned to the Council by the tracking device via the Fleet Management software.

The Council has over 500 fleet vehicles many of which are allocated to staff who return the vehicles to their home address at the end of the working day. As a result of the tracking device recording location data of the Council vehicles, this may constitute the personal data of the driver when matched up with the user details.

Purpose and legal basis for using your information

Purpose of processing

The main purpose of the GPS tracking system and data that is collected from the vehicles is to monitor the performance of our vehicles. In most instances the data will relate to the vehicle or service delivery and as such will not become personally identifiable.

The vehicle tracking data will be used in the following ways:

- To learn about how the vehicles are used, including number of journeys, speed of the vehicle, regular journeys, and rest points.
- Tracking data could be used to locate lost or stolen vehicles in order to recover them.

- To monitor you (and the vehicles) whereabouts from a duty of care perspective as your employer.

The secondary purposes for processing the vehicle tracking data are as follows:

- Evaluating the way services are provided and journeys required to deliver those services.
- To identify efficiency savings by analysing working patterns and stock use.
- To research and evaluate innovative ways of working.
- Evaluate the option of transitioning to ultra-low emission vehicles and optimum locations for vehicle chargers and the optimum charging routines for individual vehicles.
- To protect you in the event of a road traffic accident or incident to establish any responsibility.
- Potentially, through the capture of speeding events or inappropriate vehicle utilisation, it may lead to management and/or disciplinary action and in developing performance and/or capability actions, all in line with our Policies & Procedures.
- Information could also be used in criminal investigations where requests are received from the Police Authority and where properly allowed.
- To defend the Council in any civil litigation proceedings regarding the vehicles or drivers, and to assist in any insurance disputes.

Legal basis for processing

In order for the processing of personal data to be lawful under the General Data Protection Regulations 2016, a valid condition from Article 6 of the Regulation must be identified, which is outlined below.

When processing the vehicle tracking data for the purposes of managing the fleet of vehicles or monitoring the use of the vehicles by employees, we are relying upon the following lawful basis for processing:

Article 6 (1)(f) processing is necessary for the purposes of the legitimate interests pursued by CCBC or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject

When processing the vehicle tracking data for the purposes of assisting the Police/Crown Prosecution Service with the detection and prevention of crime, or the apprehension or prosecution of offenders we are relying upon the following lawful basis for processing:

Article 6(1)(c) processing is necessary for compliance with a legal obligation to which the Council is subject.

Who will have access to your information

Identity of Data Controller and Data Protection Officer

The Data Controller for your information is Caerphilly County Borough Council. The Data Protection Officer is:

Mr Carl Evans
Corporate Information Governance Manager / Data Protection Officer
Email: dataprotection@caerphilly.gov.uk
Tel: 01443 864322

Details of main users of your information

The vehicle tracking data may be used by the following service areas:

Fleet Management Team
Transformation Team

Details of any sharing of your information within Caerphilly County Borough Council

Human Resources
Insurance
Internal Audit

Details of any sharing of your information with other organisations

The vehicle tracking data may be shared in accordance with the law, with the Police and the Council's insurers, as noted above.

Details of any external data processors

The vehicle tracking data will also be shared with our chosen data processors for the purposes of evaluating the tracking data and planning effective journeys. All data processors will be required to sign the Council's terms and conditions to ensure the data is protected and processed in accordance with the law. The chosen data processors are:

Optrak Distribution Software Ltd
Cardiff University Data Innovation Research Institute
Flexible Power Solutions

Requests for information

All recorded information held by Caerphilly County Borough Council may be subject to requests under the Freedom of Information Act 2000, Environmental Information Regulations 2004 and Data Protection legislation.

If the information you provide is subject to such a request, where possible Caerphilly County Borough Council will consult with you on its release. If you object to the release of your information we will withhold your information if the relevant legislation allows.

How long will we retain your information

Details of retention period

How long Caerphilly County Borough Council retains information is determined through statutory requirements or best practice.

Data obtained by the vehicle trackers will be overwritten after 30 days, but data that requires retention due to an incident will be (securely) stored for the required length of time according to the purpose, as outlined in the Council's Records Retention and Disposal Policy.

Data processed by Optrak Distribution Software Ltd will be retained for a period of no longer than 2 years.

Your Rights (Inc Complaints Procedure)

Your rights under the Data Protection legislation

Data Protection gives data subjects (those who the information is about) a number of rights:

- The right of subject access – Application forms for this process are available on our website: [SAR Form](#)
- The right to be informed
- The right of rectification
- The right to erasure
- The right to restrict processing
- The right to object
- The right to data portability
- Rights in relation to automated decision making and profiling.

Further information on your rights is available from: www.ico.org.uk.

To enact your rights please contact the service area detailed on the top of this form.

Complaints Procedure

If you are unhappy with the way that Caerphilly County Borough Council has handled your request / information, you have the right of complaint. Please contact the Service Area detailed at the top of this document outlining your issues.

If you remain unhappy you also have a right of complaint to the Information Commissioner's Office. Please follow this link for further information on the complaints process.

www.caerphilly.gov.uk/My-Council/Data-protection-and-freedom-of-information/Questions-and-complaints

Summary Privacy Notice

How we will use your information

Caerphilly County Borough Council vehicles are fitted with a GPS tracking device that allows us to track that vehicles' journeys. The Council has over 500 fleet vehicles many of which are allocated to staff who return the vehicles to their home address at the end of the working day. As a result of the tracking device recording location data of the Council vehicles, this may constitute the personal data of the driver when matched up with the user details. The main purpose of the GPS tracking system and data that is collected from the vehicles is to monitor the performance of our vehicles. Also to learn about how the vehicles are used, including number of journeys, speed of the vehicle, regular journeys, and rest points. When processing the vehicle tracking data and the location data of drivers (personal data) we are relying upon our Legitimate Interests, as noted in UK GDPR Article (6)(1)(f).

You have a number of rights in relation to the information including the right of access to information we hold about you and the right of complaint if you are unhappy with the way your information is being processed.

For further information on how we process your information and your rights please click the following link:

[{Hyperlink to Full Privacy Notice on our website}](#)