

Shopper Retail Insight – Shoppers’ Privacy Notice

Shopper Retail Insight Limited (“SRI”) (referred to as “we”, “us” or “our” in this Privacy Notice) carries out video analytics for its customers which involves the use of temporary cameras to record shoppers’ behaviour in stores. The video footage is analysed and is used to create statistical reports that contain aggregated shopper metrics which we provide to our client and which they will use to improve their marketing strategies and campaigns.

The video analytics that we carry out will involve the collection of some limited personal data about shoppers and the purpose of this Privacy Notice is to tell shoppers (“you” or “your”) about how and why we collect that personal data and how we use it. SRI will be the controller of that personal data and we are committed to protecting your personal information and to respecting your privacy in accordance with applicable data protection laws. [This notice will be supplemented by our in-store signs which will provide more specific information about the recordings taking place in a particular store.]

We want you to be fully informed about how we use your data, how we keep it secure and your rights. We trust this Privacy Notice will answer any questions you have, but if not, please get in touch with us using the contact details provided at the end of this Privacy Notice.

We may need to update this Privacy Notice from time to time by updating this page.

ENSURING THE LAWFUL USE OF YOUR DATA

We will only use your personal data where we have a lawful basis to use it. When we process your personal data as part of our video analytics, we do this on the basis that it is in our and our clients’ legitimate interests to do this due to the valuable contribution that these analytics provide in assisting our clients to improve their marketing and the shopper’s in-store experience and due to the fact that the processing of personal data is kept to a minimum. Further information is provided about this below, but if you have any further queries, please contact us using the details provided at the end of this Privacy Notice.

WHAT INFORMATION WE COLLECT FROM YOU AND HOW WE USE IT

The temporary video cameras that we install in the store, film shoppers as they move in and around the relevant sections of the store which have been targeted for the research and they will capture shoppers’ behaviour such as where they go (what route do they take around the shop), what they do, for example, do they stop and look at a product, for how long, do they pick it up and do they put it in their trolley or basket, or do they put it back on the shelf? The video cameras do not capture sound. The data captured by the cameras is not linked to any other data source that might enable individuals to be identified, such as payment details and we do not use any facial recognition technology. As a result the risk that an individual will be identified from the footage is low.

Shortly after the video footage is received by SRI’s analysts, it is coded for patterns of behaviour using our software platform. This will involve us estimating the shopper’s age range, identifying their gender and recording whether they were carrying a basket or pushing a trolley or not and their group size ie. whether they were shopping alone or they appear to be shopping in a group.

The coded data (which does not contain any personal data) is then analysed to produce statistics about shoppers’ behaviour which we provide to our client in a report and which they use to help them to understand how shoppers behave in their stores in order to improve how they market to

them. The reports contain statistics/graphics (such as heat maps) which inform clients about matters such as which displays create the most interest, is a new display creating interest or are products in the wrong place, what route do shoppers take around the store, what stops them in their tracks and is there an opportunity to optimise the shoppers' journey around the store? How is shopper footfall affected by the day of the week and the time of day?

These reports will not contain any images of shoppers or any other personal data about shoppers. The client will not have access to the cameras or to the video recordings.

Clear signs are displayed at the entrance to the store and in the areas of the store where the cameras are installed. If you would prefer not to be filmed, please do not visit the store/areas of the store whilst filming is taking place. Typically the cameras will only be installed for around a 1 week period. Further information about the location of the cameras and how long they will be in operation will be provided on the in-store signs.

SHARING YOUR DATA

We do not share the personal data which is captured by our video cameras with our clients or with any third parties.

In the rare event that our cameras capture criminal activity taking place in a store, then we would share this specific piece of footage with our client and in some cases with the police to enable them to deal with this appropriately. We will do this on the basis that it is necessary to prevent or detect an unlawful act and/or for the purposes of legal proceedings, legal advice or establishing legal rights.

INTERNATIONAL TRANSFER OF YOUR PERSONAL DATA

We do not transfer or allow access to any personal data contained in the video footage outside the European Economic Area.

HOW LONG WILL WE KEEP YOUR PERSONAL DATA?

We will only retain the video recordings for as long as we need them in order to code the data for our analytics. This will typically be for between 14 and 28 days.

In the rare event that video footage captures criminal activity, or it is relevant to a dispute we will retain that specific footage for as long as we need to in order to report the criminal activity or deal with the dispute.

SECURITY

We are committed to ensuring that your personal data is secure, and we have put in place suitable technical and organisational security measures to protect it. Access to the cameras is restricted to SRI and access to the video footage is limited to those of SRI's employees who need it in order to code the data.

AUTOMATED DECISION MAKING

We do not carry out automated decision-making using information captured on the video recordings.

YOUR RIGHTS

You have the following rights in relation to the personal information we hold about you, to request:

- access to the personal data we hold about you (commonly known as a "data subject access request") including a copy of it;
- the correction of the personal information that we hold about you if it is incomplete or inaccurate;
- the deletion or removal of personal data we hold about you where there is no good reason for us continuing to process it or where you have exercised your right to object to processing (see below); and
- for our processing of your personal information to be restricted in certain circumstances, for example if you want to establish its accuracy or the reason for processing it.

You can exercise these rights by contacting us, using the contact details provided below. We may ask you for proof of your identity before dealing with your request, as a security measure to protect your data.

Right to Object or to Complain to the ICO

Where we are processing your personal data on the basis of our or our client's legitimate interests, you can ask us to stop processing it and we must do so unless we believe we have an overriding legitimate reason to continue processing your personal data or we need to process it for the establishment, exercise or defence of legal claims.

If you are dissatisfied with how we have handled your personal data, you have the right to make a complaint to the Information Commissioner's Office (ICO). You can make a complaint to the ICO by calling their helpline on 0303 123 1113 or on their website at www.ico.org.uk/concerns. However, we would appreciate the chance to deal with your concerns and so please do contact us in the first instance.

CONTACTING US

If you have any queries, comments or requests regarding this Privacy Notice, you have a complaint or you would like to exercise any of your rights set out above, you can contact us in the following ways:

- by email at: info@shopperretailinsight.com
- by post at : Shopper Retail Insight, Unit C, Nepshaw Lane South, Gildersome, Leeds, LS27 7JQ
- by phone at : + 44 7394 464066

This Privacy Notice was last updated on 18/06/19