**LETCHWORTH GARDEN CITY TRAFFIC SURVEYS – PRIVACY NOTICE**

Letchworth Garden City Heritage Foundation (“Letchworth”) will be carrying out Automatic Number Plate Recognition (ANPR) traffic surveys in parts of Letchworth Garden City and Central Bedfordshire.

The Foundation respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data in relation to these traffic surveys.

Letchworth is the ‘Data Controller’ and is the point of contact in relation to any questions or concerns you may have about your privacy, and in relation to any rights you may want to exercise as a data subject (see below for further details).

We have appointed Transportation Consultants, Steer Davies & Gleave Limited (Steer) as a Data Processor, to analyse the survey results.

### Data we need to collect and why

We need to undertake ANPR surveys to review the origins and destinations of car trips on the highway network entering/ exiting defined cordon points on the network. This will help us better understand traffic patterns and congestion in parts of Letchworth and Central Bedfordshire.

Twenty ANPR and twenty HD cameras will be installed at seventeen count locations on key highway links. The purpose of the cameras are as follows:

* ANPR camera – captures the vehicle registration number plate and a still image, to allow automatic checks to be made that the number plate legitimately belongs to that vehicle.
* HD cameras – captures a rolling video. This acts as a validation link count to the ANPR cameras, to check that the cameras have recorded the majority of vehicles.

Both cameras are attached to the same ANPR mast which will be attached to street light columns. Three of the 17 count locations will have two sets of masts with the cameras due to the width of the roads, to allow data to be captured in both traffic directions.

All cameras will be installed on Friday 14th October 2022. Surveys will be undertaken on Saturday 15th October and Tuesday 18th October 2022, and the cameras will be removed on Wednesday 19th October 2022.

The personal data captured by the cameras will include vehicle registration numbers, still vehicle images and a rolling video.

The ANPR cameras do not have a rolling video, these cameras are focused to capture the registration plates and a still image - and are angled down to achieve this. The HD cameras are installed 2.5-3 metres above ground and will be running at a 2x quicker speed than normal live footage. Being this high they just capture the top of the vehicles and go through further compression which removes a lot of the pixels. Therefore, it will not be possible to identify a driver/ individual from the footage.

The cameras will only be used to identify the number of vehicles travelling between each cordon point by vehicle type.

**Lawful basis for processing**

### We process your personal data on the lawful basis of our legitimate interests to understand traffic patterns and congestion in parts of Letchworth Garden City and Central Bedfordshire.

### Who we share your data with and why?

The vehicle registration numbers, still images and video footage will be collected on behalf of Letchworth by TRACSIS Traffic Data Limited (“TRACSIS”), a subprocessor.  TRACSIS will use a further subprocessor in India, DataCorp Traffic Private Limited (“DataCorp”) to assist in the traffic counts.

**Where the data is processed and stored**

Data will be transferred outside of the EEA by TRACSIS to DataCorp in India. TRACSIS has put in place European Commission-approved Standard Contractual Clauses with DataCorp to safeguard the personal data transferred. The vehicle registration numbers, images and videos will be deleted from DataCorp’s servers in India and the TRACSIS servers within three months of providing the processed origin and destination count data to Steer.

No personal data will be transferred to Steer or Letchworth, and both parties will only receive anonymised spreadsheets with the number of vehicles travelling between each cordon point by vehicle type, and not any vehicle registration numbers, images or videos.

### Your rights as a data subject

You have rights in relation to our processing including the right to ask for access to your data and, where data is found to be inaccurate, ask to have that data corrected. In certain circumstances you have the right to have data held about you erased or the use of it restricted. You may also object to processing.

You also have a right of complaint to the Information Commissioner’s Office (ICO) at [www.ico.org.uk](http://www.ico.org.uk) if you think we have not dealt with your information in a proper manner. You can contact our Data Protection Officer at response@letchworth.com.

For more on the Heritage Foundation’s privacy policy visit [letchworth.com/privacy-cookies](https://www.letchworth.com/privacy-cookies)