

## Eurotunnel – Site Access Privacy Notice

### What does this notice cover?

This Privacy Notice applies to the processing of personal data, which means information about an identifiable individual ("**you**") that **Eurotunnel** ("**Eurotunnel**", "**we**" or "**us**" or "**our**") collects about you in order to grant access to the secure Eurotunnel site.

It also describes your data protection rights, including a right to object to some of the processing which we carry out. More information about your rights, and how to exercise them, is set out in the "What are your rights and choices?" section below.

We may also provide you with additional information when we collect personal data, where we feel it would be helpful to provide relevant and timely information.

Why do we collect personal data?

Eurotunnel is a secure site. Access to our site is controlled in accordance with various legislation relating to the Channel Tunnel. In order to access the site we are required to ask you to provide personal information.

### What personal data do we collect?

As a data controller we collect and process the following types of personal data about you in connection with your access to site (to the extent permitted by law):

- **Contact information:** such as your name, gender, age, date of birth, home address and postcode, personal email address, phone numbers and other similar information.
- **Identification information:** such as your employee ID number, photograph, passport number, driving licence number, government identification numbers (e.g. National Insurance Number, Social Security Number), biometric data (your fingerprints), details of any unspent criminal convictions (where required for security and vetting purposes), citizenship, immigration status and copies of identity documentation, as permitted and required in order to check your right to work.
- **Location information:** access pass swipe record
- **CCTV images and recordings.**
- **Financial information:** Credit checks (where required for security and vetting purposes) and other similar information.
- **Any other information you submit to us (including during the course of any correspondence with us):** such as signatures, photographs, opinions.

On occasion, we receive personal data from third party sources, such as: government authorities and by financial institutions.

### How do we use this personal data and what is the legal basis for its use?

We collect, use and store your personal data for the following purposes:

- **Where necessary to comply with a legal obligation:**
  - Undertaking criminal record and financial credit checks to comply with security and identification verification protocols and legislation.

- **Where necessary for our legitimate interests, as listed below, and where our interests are not overridden by your data protection rights:**
  - Protecting our legitimate business interests and legal rights. This includes but is not limited to, use in connection with legal claims, compliance, regulatory, auditing, investigative and disciplinary purposes (including disclosure of such information in connection with legal process or litigation) and other ethics and compliance reporting tools.
  - To protect our legal rights and manage the security of our networks and property (for example through the use of CCTV).
  - Managing the performance and security of our equipment, facilities, intellectual property and electronic platforms. This includes administering access rights, monitoring compliance with information security and other company policies, and where permitted by local law and in accordance with relevant policies, for investigations and disciplinary actions.
  - Providing your site access pass. This includes the information you provide for your pass (including your photo).

#### **How do we justify our legitimate interests?**

We have carried out balancing tests for all the data processing it carries out on the basis of its legitimate interests, which we have described above. You can obtain information on our balancing tests by contacting us on the details below.

#### **How long will we retain your personal data for?**

We will keep your personal data obtained in relation to the application for security vetting, and site access pass issue process, for 5 years from the date of vetting. Images/photos taken for visitor passes are kept for 12 months. Images/photos taken for staff passes are retained during the period of employment with us. Laws may require us to hold certain information for specific periods or indefinitely in the case of an individual who has been banned from site. CCTV images and recordings are retained for 30 days except where government authorities or law enforcement officials require footage to be preserved, in which case it is retained for as long as is necessary to conclude an investigation. In other cases, we will retain data for an appropriate period protect against legal claims, or to administer our business.

#### **How will we share your personal data?**

Your personal data will also be shared with the Department for Transport for vetting purposes, government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of our legitimate interests in compliance with applicable laws.

In the event that we or Getlink are sold or integrated with another business, your details will be disclosed to our advisers and any prospective purchaser's adviser and will be passed to the new owners of the business.

## **What are your choices and rights?**

The accuracy of the information that we hold about you is important to us. If any of the information that we hold is inaccurate or out of date, please let us know using the contact details set out at the end of this Privacy Notice. You also have the right:

- To ask us for a copy of your personal data.
- To have your personal data corrected if it is inaccurate or incomplete.
- To restrict the processing of your personal data.
- To obtain the personal data you provide in a structured, machine readable format and ask us to share (port) this personal data to other organisations.
- To object to processing in some circumstances

These rights may be limited in some situations – for example, where we can demonstrate that we have a legal requirement to process your data, where they would infringe the rights of a third party (including our rights) or if you ask us to delete information which we are required by law or have compelling legitimate interests to keep. Relevant exemptions are included in the GDPR and in the French and UK Data Protection Laws. We will inform you of any relevant exemptions we rely upon when responding to any request you make.

If you wish to exercise these rights, please contact us using the details below.

If you have unresolved concerns you have the right to complain to an EU data protection authority where you live, work or where you believe a breach may have occurred.

It is important that we maintain up to date records of key information about you. Please notify us of any changes in your personal circumstances as soon as they occur (e.g. change of address, marital status). From time to time we may ask you to complete the vetting process again to ensure our records are up to date. Where we require personal data to comply with legal or contractual obligations, then the provision of such information is mandatory: if such data is not provided, then we will not be able to grant access to site. In all other cases, the provision of requested personal data is optional.

## **Updates to this notice**

We keep our privacy notice under regular review and may update it periodically. We will update the date at the top of this Privacy Notice accordingly. On some occasions, we may also actively advise you of specific data handling activities or significant changes to this Privacy Notice as required by applicable law.

## **Contact us**

We hope that we can satisfy queries you may have about the way we process your data. If you have any concerns about how we process your data, feel free to discuss these in the first instance with the legal department. If you require further information you can contact our Data Protection Officer. Contact details are set out below:

### **Legal Department:**

Email for UK and France: [legal@eurotunnel.com](mailto:legal@eurotunnel.com)

Post: In the UK: Eurotunnel Legal Department, UK Terminal, Ashford Road, Folkestone, Kent CT18 8XX

Post: In France: Eurotunnel Department Juridique Siege Exploitation B.P. 69 62904 Coquelles. Cedex. France

**Getlink Data Protection Officer:**

Email: [DPO@getlinkgroup.com](mailto:DPO@getlinkgroup.com)

Post: In the UK: Getlink Data Protection Officer, Eurotunnel, UK Terminal, Ashford Road, Folkestone, Kent CT18 8XX

Post: In France: Getlink Data Protection Officer, Eurotunnel, Siege Exploitation B.P. 69 62904 Coquelles. Cedex. France

**Who is my data controller?**

Your data controller will be the Getlink entity which employs you or engages you as a contractor.

In the UK, this will be Eurotunnel Services Limited, which you can contact at:

Email: [legal@eurotunnel.com](mailto:legal@eurotunnel.com)

Post: Eurotunnel Legal Department UK Terminal, Ashford Road, Folkestone, Kent CT18 8XX

In France, this will be Eurotunnel Services GIE, which you can contact at:

Email: [legal@eurotunnel.com](mailto:legal@eurotunnel.com)

Post: Eurotunnel Department Juridique Siege Exploitation B.P. 69 62904 Coquelles. Cedex. France