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1. Introduction

This Privacy Notice describes how we collect and use personal information about you. In accordance with the General Data Protection Regulation (GDPR). It applies to members of the public that might occasionally and/or unintentionally be captured by our Security Systems (together referred to as 'you' or 'data subject').

Marshall is the "data controller" for the purposes of data protection law. This means that we are responsible for deciding how we hold and use personal information. We are required by law to notify you of the information contained in this Privacy Notice.

It is important that you retain and read this document.

We may update this document at any time and the latest version will always be available on the Marshall Privacy Notice web page, but we will update this Privacy Notice when any significant changes occur. A paper copy of this privacy notice can be obtained on request from the Data Privacy Manager.

2. Responsibilities

- 2.1 The Data Privacy Manager is responsible for ensuring that this notice is made available to data subjects whose personal data Marshall collect or process.
- 2.2 All Employees of Marshall who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention.

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3. Privacy Notice

3.1 Who we are

In the context of this Privacy Notice 'Marshall' refers to a group of different legal entities, details of which can be found on the Marshall Privacy Notice web page.

This Privacy Notice is issued on behalf of the group of companies known as Marshall, so when we refer to 'Marshall', 'The Company', 'we', 'us' or 'our' in this Privacy Notice, we are referring to the relevant company responsible for processing your personal data.

The entity which will be the controller for your data is Marshall of Cambridge (holdings) Ltd

Our Data Privacy Manager can be contacted directly here:

- DataPrivacyManager@marcamb.co.uk (Marshall Data Privacy Manager)
- +44 (7469) 103461

Any queries referring to this Privacy Notice should be referred to the Data Privacy Manager in the first instance.

3.2 Personal data types:

Personal data is any information that identifies a living individual such as name, an identifying number (e.g. National Insurance No, Clock No), location, Image or physical characteristics associated to that individual. It can be an opinion of someone, or any information that when combined together identifies the person.

In the context of this document this data will be referred to as **ordinary**.

Some personal data is classed as "**special category data**".

This is data referring to race/ethnicity, religious beliefs, sexual orientation, political opinions, trade union membership, information about your health, genetic and biometric information and criminal records.

3.3 We may collect and process the following personal data about you:

The Personal Identifiable Information we could use is:-

Ordinary personal data

- Images and/or sound collected by our security systems;
- Witness statements

Special category personal data

- We do not knowingly collect any Special Categories of Personal Data. It is also highly unlikely that children or vulnerable groups will be captured. However, if unintentionally any recordings of children or vulnerable groups were to take place, we will retain this data for only as long as is necessary to fulfil the purpose

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3.4 The personal data we collect will be used for the following purposes:

- Assist in the prevention of criminal activities
- Provide a safe and secure environment for staff Customers and Visitors
- Aid Law enforcement with information for the apprehension of offenders
- Prevent Loss or damage of Marshall assets
- To comply (where applicable) with both legal, regulatory and contractual compliance such as, (but not limited to) MoD and CAA obligations.

Our legal basis for processing the personal data is:

Legitimate Interest

We use Legitimate Interest to process your personal data to allow us to:

- Prevent criminal activity as a legitimate interest pursued by the controller , per article 6(1)(c) of the GDPR

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For a detailed list of the categories of Personal Identifiable data and our legal basis for processing please see Appendix A below.

Disclosure

Your information will be shared internally, including with members of the Security Team.

we could share your data with Marshall Group subsidiary Companies and other third parties listed below:

- Law enforcement bodies
- Other Government Agencies that could have a need to know, such as (but not limited to) medical services to aid in treatment of an individual.

We share your data with third parties in order to:

- Aid Law enforcement bodies with information for investigating criminal activities
- Assist in the treatment or wellbeing of an individual

For a full list of current third party providers who may hold your personal data and how you can exercise your rights please refer to the Third Party Service Provider Privacy Notices under the Privacy Section of the Marshall Group company website.

Please note this *could* involve the transferring of personal data outside of the UK & European Economic Area (EEA). In such circumstances you will need to refer to the relevant government agencies privacy notices.

3.7 Transferring personal data to other countries

We will not transfer your data to other countries unless we are required to do so by law.

3.8 Retention period

We will hold your personal data for as long as is legally necessary to satisfy the purpose for which it was obtained. The period of time for which your personal data is held can be found in the Company Retention Register which can be found on the Marshall Privacy Notice web page.

3.9 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

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- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to ask for data that we hold about you that is inaccurate or incomplete to be corrected.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records. If there is no overriding legal reason to keep it.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing
- Right to object to automated processing, including profiling – You have the right to ask for certain important computer-made decisions (including profiling) to be challenged and to ask for a human to intervene.
 - (Please note that at this time no automated processing of Personal Identifiable Information (PII) is in operation.
- in the event that Marshall refuses your request under rights of access, we will provide you with a reason as to why.
- Where the legal basis for the processing of PII data is 'consent', you have the right to withdraw that consent at any time and the record will be deleted where there is no overriding legal basis to keep it.

Please note that it is the company's policy not to use consent for the legal basis for process except in exception cases with the express approval of the Data Privacy Manager.

You have the right to complain as outlined in clause 3.10 below.

All of your rights identified above apply to any third party (as stated in 3.6 above) should they be involved in the processing of your personal data.

If you would like to exercise any of these rights, please contact the company Data Privacy Manager, by emailing DataPrivacyManager@MarshallADG.com or by sending written correspondence to The Data Privacy Manager, Marshall Group, Airport House, Newmarket Rd, Cambridge, CB5 8RX.

You can make a data subject access request by completing the organisation's Data Subject Access Request Form on the Marshall Privacy Notice web page

3.10 Complaints

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In the event that you wish to make a complaint about how your personal data is being processed by Marshall (or third parties as described in 3.6 above), or how your complaint has been handled, you have the right to lodge a complaint directly with Marshall's Data Privacy Manager, by emailing DataPrivacyManager@marcamb.co.uk or by sending written correspondence to The Data Privacy Manager, using the contact details below.

If the complaint is not resolved to your satisfaction you have the right to lodge the complaint with the Supervisory Authority, whose details are also below.

The details for each of these contacts are:

	Data Privacy Manager	Supervisory Authority
Contact Name:	Isobel Aylott	Information Commissioners Office (ICO)
Address line:	Marshall Group, Control Building, The Airport, Newmarket Rd, Cambridge, CB5 8RX	Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF
Email:	DataPrivacyManager@Marcamb.co.uk	https://ico.org.uk/global/contact-us/email/
Telephone:	+44 (7469) 103461	03031231113
Website		https://ico.org.uk/concerns/

The recommended method of communication to the ICO is via their website

Document Owner and Approval

The Data Privacy Manager is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

Change History Record

Issue	Description of Change	Approval	Date of Issue
1	First issue	Head of Information Governance	01/07/2026

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APPENDIX A– FURTHER DETAILS

This section of the Privacy Notice tells you in more detail about the type of personal data we hold about you, what we use it for, our legal grounds for doing so, who we share it with and how long we keep it.

Please note that we will not necessarily hold, use or share *all* of the types of personal data as described in this Appendix in relation to you. The specific types of data about you that we will hold, use and share will depend on your relation with Marshall, your individual circumstances and circumstances affecting the company from time to time. We are only likely to share information about you with professional advisers in particular circumstances.

Note also that the first two Tables below divide items of personal data into relatively broad categories (under the heading “Type of ordinary personal data held by us”, or “Type of special category personal data held by us”). Where multiple purposes and/or legal grounds for our use of a given “type” of personal data are identified, this does not necessarily mean that *all* of the purposes and/or legal grounds are applicable to *all* items of personal data falling within that “type” of personal data.

More information about your ordinary personal data

Type of ordinary personal data held by us	What we use it for	Legal ground

More information about your special category data

We do not knowingly capture any special category data. It is highly unlikely that children or vulnerable groups will be captured

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More information about how we share your personal data

Write statement

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