



# Live Facial Recognition

## Privacy Notice

### Introduction

This Specific Privacy Notice has been created to explain how Greater Manchester Police (GMP) processes your personal data and why and how it is used in connection with Live Facial Recognition.

This should be read in conjunction with GMP's overarching [Privacy notice | Greater Manchester Police](#) which details your individual rights relating to your personal data and describes how GMP protects your data.

Personal data is any data that can be used to identify a living individual, on its own or in combination with other available information. References to names, identification numbers and location data would all be personal data. Processing means anything we do with the data and includes collecting, storing, sharing and disposing.

The use and disclosure of personal data is governed in the United Kingdom by the Data Protection Act 2018.

### Data Controller

Under the Act the Chief Constable of Greater Manchester Police is registered as the controller for any personal data processed by GMP.

### Data Protection Officer

The Data Protection Officer  
Information Governance Unit  
Information Management and Data Directorate  
Greater Manchester Police  
Openshaw Complex  
Lawton Street  
Manchester  
M11 2NS

Email: [dataprotection@gmp.police.uk](mailto:dataprotection@gmp.police.uk)

## **For what purpose(s) is my personal data intended to be processed by GMP?**

### **For Law Enforcement Purpose:**

Defined as the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including the safeguarding against and the prevention of threats to public security.

Where GMP is processing data for the law enforcement purposes, the lawful basis for processing is provided in Section 35(1),(2),(3),(5) and schedule 8(1),(2),(4) of the Data Protection Act 2018.

### **For General Purpose:**

Where GMP is processing data for a general purpose, the lawful basis will fall into either Article 6(1)(a) or Article 6(1)(e). The relevant article 6 condition will be met with the relevant Article 9 conditions. These will be Article 9(2)(a) or Article 9(2)(g).

Processing under Article 9(2)(a) will be limited to processing participating staff images for the purpose of validating LFR technologies.

Where explicit consent is sought in the limited circumstances in which it is required, the consent is unambiguous and for one or more specified purposes, is a freely given, is a fully informed affirmative action which is recorded and managed to ensure the facilitation of individual rights, including withdrawal of consent.

Article 9(2)(g) requires a further schedule to lawfully meet this legal basis. Schedule 1, Part 2:

Para 5 Requirement for an Appropriate Policy Document  
Para 6 Statutory etc, and government purposes  
Para 18 Safeguarding of children and of individuals at risk

### **The Purpose(s):**

More specifically, the purpose is to identify possible biometric template matches for relevant data subjects for the following reasons:

- Wanted by the courts;
- Suspected of having committed an offence, or where there are reasonable grounds to suspect that the individual depicted is about to commit an offence or where there are reasonable grounds to suspect an individual depicted to be committing an offence;
- Subject to bail conditions, court order or other restriction that would be breached if they were at the location at the time of the Deployment;
- Missing persons deemed at increased risk;
- Presenting a risk of harm to themselves or others
- a victim of an offence or a person who the police have reasonable grounds to suspect would have information of importance and relevance to progress an

investigation, or who is otherwise a close associate of an individual and that individual would fall within people wanted by the courts and presenting a risk of harm to themselves or others

## **What are my rights under the Data Protection Act?**

Under the Data Protection Act 2018 you have a number of rights that you can request in relation to the data we process about you, these are not absolute rights. By law you have the right to request:

- Right of access to your personal data
- Right of rectification of your personal data
- Right of erasure of your personal data
- Right of restriction of its processing
- Right to lodge a complaint with the Information Commissioner

Full details of those rights and how to exercise them can be found in the [Privacy notice | Greater Manchester Police](#).

To exercise any of these rights, other than the final in the list above, please contact the Information Compliance and Records Management Unit at: [subjectaccess@gmp.police.uk](mailto:subjectaccess@gmp.police.uk), via post:

Information Governance Unit  
Information Management and Data Directorate  
Greater Manchester Police  
Openshaw Complex  
Lawton Street  
Manchester  
M11 2NS

## **How long will my personal data be retained?**

Images held within GMP's local systems will be retained in line with the [Code of Practice on Police Information and Records Management \(PIRM\) 2023](#) and GMP's retention policies.

LFR watchlists will be retained only for the duration of the deployment and for an appropriate time prior to, and following deployment and only to facilitate the need. Where possible watchlists should not be older than 24 hours at the point deployment starts and should not be retained for longer than 24 hours following conclusion of the deployment.

Biometric Templates created by the technology that does not generate a possible match are automatically deleted immediately.

Biometric Templates created by the technology that does generate an Alert for a possible match, are deleted as soon as practicable and in any case within 24 hours of the end of a deployment.

CCTV footage recorded throughout deployment will be retained for 31 days and disposed of in line with Force policy. Unless retention is lawfully required for a further purpose, such as to meet the needs of further investigation.

## Who will we share your data with

GMP will not routinely share Live Facial Recognition personal data.

Should an alert be generated following a possible match, all subsequent processes will involve GMP personnel following usual policing protocols. These following actions may involve GMP sharing personal data with partners as per usual policing practices. For further information around data sharing please see GMP's overarching privacy notice. [Privacy notice | Greater Manchester Police](#)

## Complaints

If you have any concerns about GMP's use of your personal information, you can make a complaint to us at:

Information Governance Unit  
Information Management and Data Directorate  
Greater Manchester Police  
Openshaw Complex,  
Lawton Street,  
Openshaw,  
Manchester,  
M11 2NS

**Email:** [dataprotection@gmp.police.uk](mailto:dataprotection@gmp.police.uk)

If you are dissatisfied in the way in which your complaint was handled, you have the right to lodge a complaint with the ICO.

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>