



[redacted]

Data Protection Officer
Southern Co-operative

Sent by email

17 December 2020

Dear [redacted]

Thank you for your response to our letter dated 11 December 2020.

While we appreciate the positive assurances you have provided, we continue to have serious concerns about the decision to continue with the use of facial recognition technology which have unfortunately not been addressed by your response.

While we welcome the fact that you have conducted an impact assessment – as required – we are concerned that it concluded that the use of facial recognition “did not create a high risk to the rights and freedoms of data subjects” given the intrusive nature of such a deployment.

Further, we are still unaware if the “distinctive signage” in the 18 stores in which the system is being deployed provides sufficient clarity to the public because we do not know which stores are using the system and how they make this fact known.

Finally, we are deeply concerned that you will not investigate or at least confirm with Facewatch whether it has allowed any police force to access the cameras in the way described in Facewatch’s own marketing material, which we shared with you.

Given these serious outstanding concerns, we call on you to:



- Publish the impact assessment undertaken by Southern Co-op to provide the public with confidence that it sufficiently addresses the wide-ranging concerns raised by the use of the system;
- Confirm specifically which of your stores has used the system, which ones continue to do so, and what exact signage they use to make this fact known to the public;
- Investigate whether Facewatch has allowed any police force to use the cameras in the ways described in their marketing material.

We would appreciate a response at your earliest convenience.

Yours sincerely,

Edin Omanovic
Advocacy Director