



Effective Date: August 25, 2026

Data Privacy Notice – AI Safety Monitoring

Who is This Notice For

This notice is for Americold associates, and any visitors or contractors, who work in or enter areas of our sites that are covered by our AI-assisted safety monitoring.

It should be read together with the Americold Associate Data Privacy Notice, which provides more detailed information about how Americold processes personal data.

Who Uses Your Personal Data

- Americold operates the safety monitoring program and is the Data Controller.
- Inviol Limited (New Zealand) provides the AI safety analytics platform and acts as our processor.
- Microsoft Azure provides the cloud hosting used to support the platform.

Americold determines how and why your data is used. Inviol and its hosting providers process the data only on our documented instructions.

What Personal Data is Used

The system uses AI to analyze footage from a limited number of existing CCTV cameras. The following data may be processed:

- Video images of people in the monitored areas
- Automatically detected safety events (for example, pedestrian and forklift proximity, exclusion-zone breaches, or speed) with a risk rating
- Short video clips (around 20–30 seconds) linked to a detected safety event, used for coaching

The system does not use facial recognition and does not process biometric data. Automatic face and people blurring is applied to captured footage, and most processing takes place on-site.

Why Your Data is Used

Your personal data is used to:

- Identify safety hazards and unsafe behaviors before incidents occur
- Create coaching and training opportunities to strengthen our safety culture
- Help us meet our health and safety responsibilities

The system is not used for employee performance monitoring, disciplinary action, or automated decisions that produce legal or similarly significant effects. Detected events are always reviewed by a person before any coaching takes place.

Legal Basis

Your data is processed because it is:

- Necessary for our legitimate interests in keeping people safe on site, and
- Necessary to meet our legal obligations under health and safety legislation.

International Data Transfers

Because Inviol is based in New Zealand and uses cloud hosting, some data may be processed outside the United Kingdom. New Zealand benefits from a UK adequacy decision, and where required, appropriate safeguards are used, such as Standard Contractual Clauses, the UK International Data Transfer Addendum, and technical security measures including encryption.

You may request further information about these safeguards by contacting privacy@americold.com.

How Long is Data Kept

We keep data only as long as needed for the safety purpose:

- Raw footage is kept for a short period (around 30 days) and then automatically overwritten
- Flagged coaching clips are kept only for as long as needed for the coaching and are then deleted

Retention follows Americold's global records management practices.

Your Rights

Depending on your circumstances, you may have the right to:

- Access your personal data,
- Correct inaccurate or incomplete data,
- Request deletion in certain circumstances,
- Restrict processing in limited cases,
- Receive a copy of certain data in a portable format,
- Object to processing based on legitimate interests or to direct marketing,
- Withdraw consent where processing is based on consent, and
- Obtain human review of certain automated decisions.

To exercise your rights, contact privacy@americold.com

Where to Find More Information

For full details about how Americold handles associate personal data, including your rights and international transfers, please review the Associate Data Privacy Notice available on the Compliance SharePoint

If you have questions about this Notice or how we handle your personal data, contact: privacy@americold.com or use the [Americold Ethics Helpline](#).