



LIVE FACIAL RECOGNITION “LFR” - Frequently Asked Questions

What is LFR?

LFR captures and analyses facial images in real-time from live video feeds, comparing them against a database of selected images – in this case those individuals that have registered with (“SENSE” or the “Scheme”) the Self Enrolment National Self Exclusion Scheme.

How does our LFR work?

Our LFR continuously scans live video feeds, detecting faces and comparing them in real-time against a database. When a match is found, it alerts our staff who then use CCTV to verify the correct identity, before any relevant action is taken.

Where and when is LFR being used?

All entrances to the Hippodrome Casino premises are covered by LFR, 24 hours a day, 7 days a week. Clear signage is displayed before you enter the building and a privacy notice dedicated to LFR can be found at <https://www.hippodromecasino.com>. LFR will only detect you once on our premises.

Am I on the database?

The database used with our LFR only contains the details of those individuals who have registered with SENSE - <https://sensescheme.com>

Is everyone scanned by the LFR system?

Yes. However, it only alerts our staff if a facial image matches an image on the database. If you are not enrolled as a member of SENSE you are not on the database and the system deletes your image within one second of capture.

How accurate is the LFR system?

Our LFR operates to a very high accuracy rate – and this has been verified by our staff during a thorough testing process prior to implementation. However, all matches / alerts are subject to secondary verification by our staff to eliminate false positive matches.

Are you recording all the video feeds?

No, we don't record the LFR video feeds. LFR processes images in real-time without storing them. If you are not on the database, your image is deleted automatically within one second of capture.

Can I 'opt out' of LFR?

No - Due to the nature of how LFR is intended to operate and the importance of ensuring persons registered on SENSE are not able to enter the casino premises, individual opt-outs are not possible. In conjunction with the Scheme, we believe it is proportionate for all visitors to be scanned momentarily to prevent problem gamblers from breaching their exclusion agreements. If you do not wish to be scanned, we simply advise not to enter the premises.

Is the system GDPR compliant?

Yes - Our use of LFR complies with GDPR as supported by a thorough Data Protection Impact Assessment (DPIA) carried out prior to implementation. This is supplemented by a robust and well-designed privacy framework governing the use of the system including testing, staff training, stakeholder consultation. This serves to minimise intrusion and protect your important rights as individuals.

Can I make a data subject access request off the back of the system processing my personal data?

Yes – However, due to the system deleting the image within one second of capture, if you are not on the database, your data subject access request will not return any personal data.

I'd like to know more about your LFR – where can I find this and who do I contact?

In the first instance, please contact the Hippodrome Casino Data Protection Officer – dataprotection@hippodromecasino.com. Alternatively, contact Self Enrolment National Self Exclusion Ltd the operator of the scheme and Joint Controller – info@sensescheme.com