

## CCTV Policy

The purpose of this policy is to regulate the management and operation of the Closed-Circuit Television (CCTV) System in place at D.K. Holdings Limited. It also serves as a notice and a guide to data subjects, (including employees, contractors, visitors and members of the public) regarding their rights in relation to personal data recorded via the CCTV system.

The system is administered and managed by D.K. Holdings Limited, who act as the Data Controller. This policy will be subject to review from time to time and should be read with reference to D.K. Holdings Limited Data Protection Policy. For further guidance, please review the Information Commissioner's CCTV Code of Practice.

All fixed cameras are in plain sight on D.K. Holdings Limited premises and D.K. Holdings Limited does not routinely use CCTV for covert monitoring of private property outside D.K. Holdings Limited grounds.

(see attached for Camera Placement)

D.K. Holdings Limited purposes for using CCTV are set out below and, having fully considered the privacy rights of individuals, D.K. Holdings Limited believes these purposes are all in its legitimate interests. Data captured for the purposes below will not be used for any commercial purpose.

### 1. Objectives of the system

- 1.1 To protect D.K. Holdings Limited buildings and equipment, and the personal property of employees, contractors, visitors and members of the public.
- 1.2 To protect employees, contractors, visitors and members of the public regarding their personal safety.
- 1.3 To support the police and community in preventing and detecting crime and anti-social behaviour and assist in the identification and apprehension of offenders.

### 2. Positioning

- 2.1 Locations have been selected outside, that D.K. Holdings Limited reasonably believes requires monitoring to address the stated objectives.
- 2.2 Adequate signage has been placed in prominent positions to inform employees, contractors, visitors and members of the public that they are entering a monitored area, identifying D.K. Holdings Limited as the data Controller and giving contact details for further information.
- 2.3 No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and washroom facilities.
- 2.4 No images of public spaces will be captured except to a limited extent at site entrances and where our premises border with public thoroughfares.

### 3. Maintenance

- 3.1 The CCTV system will be operational 24 hours a day, every day of the year.
- 3.2 The system manager (defined below) will check and confirm that the system is properly recording and that cameras are functioning correctly, on a regular basis.
- 3.3 The system will be checked and (to the extent necessary) serviced no less than annually.

### 4. Supervision of the System

- 4.1 Staff authorised by D.K. Holdings Limited to conduct routine supervision of the system.
- 4.2 Images will be viewed and/or monitored in a suitably secure and private area to minimise the likelihood of or opportunity for access to unauthorised persons.

## **5. Storage of Data**

- 5.1 The day- to-day management of images will be the responsibility of Mr Peter Goodhew who will act as the System Manager, or such suitable person as System Manager shall appoint in his or her absence.
- 5.2 Images will be stored for 14 days, and automatically over-written unless D.K. Holdings Limited considers it reasonably necessary for the pursuit of the objectives outlined above, or if lawfully required by an appropriate third party such as the police or local authority.
- 5.3 Where such data is retained, it will be retained in accordance with the Act and our Data Protection Policy. Information including the date, time and length of the recordings, as well as the locations covered, and groups of individuals recorded, will be recorded in the system log book.

## **6. Access to Images**

- 6.1 Access to stored CCTV images will only be given to authorised persons, under supervision of the System Manager, in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access).
- 6.2 Individuals have the right to access personal data D.K. Holdings Limited holds on them (please see the Data Protection Policy), including information held on the system, if it has been kept. D.K. Holdings Limited will require specific details including at least the time, date and camera location before it can properly respond to such requests. This right is subject to certain exemptions from access, including in some circumstances where others are identifiable.
- 6.3 The System Manager must satisfy themselves of the identity of any person wishing to view stored images or access the system and the legitimacy of the request. The following are examples when the System Manager may authorise access to CCTV images:
  - 6.3.1 Where required to do so by the Police or some relevant statutory authority
  - 6.3.2 To make a report regarding suspected criminal behaviour
  - 6.3.3 To data subjects (or their legal representatives) pursuant to an access request under the DPA2018 Act and on the basis set out in 6.2 above;
  - 6.3.4 To D.K. Holdings Limited insurance company where required in order to pursue a claim for damage done to insured property; or
  - 6.3.5 In any circumstances required under law or regulation.
- 6.4 Where images are disclosed under 6.3 above a record will be made in the system log book Including the person viewing the images, the time of the access, the reason for viewing images, the details of images viewed and a crime incident number (if applicable).
- 6.5 Where images are provided to third parties under 6.3 above, wherever practicable steps will be taken to obscure images of non-relevant individuals.

## **7. Other CCTV Systems**

- 7.1 D.K. Holdings Limited does not own or manage third party CCTV systems, but may be provided by third parties with images of incidents where this is in line with the objectives of D.K. Holdings Limited own CCTV policy.

## **8. Complaints and queries**

- 8.1 Any complaints or queries in relation to D.K. Holdings Limited CCTV system, or its use of CCTV, or requests for copies, should be referred to Mr Darren Mills [dmills@dk-holdings.co.uk](mailto:dmills@dk-holdings.co.uk)

Please see our Data Protection Policy and DPIA for CCTV