



CLOSE CIRCUIT TELEVISION POLICY

Introduction

This Policy sets out the use and management of closed-circuit television (CCTV) equipment and collected images deployed by the Company in compliance with General Data Protection Regulation ((EU) 2016/679), Data Protection Act 2018 and the CCTV Code of Practice.

This Policy should be read in conjunction with relevant Company policies, including:

- a. Data Protection Policy.
- b. Biometric Data Policy.

Description of Installations

SDC Builders and its associated Companies use fixed CCTV cameras at many of its business premises and construction sites. These are positioned at strategic points both inside and outside of these locations and their perimeters. These cameras (including any casings) are not covered or hidden and monitor activities on an ongoing and continuous basis (including the use of time-lapse images). The Company will not conduct CCTV surveillance in any changing room or toilet facility

The CCTV cameras record and store images and create records (including reports) of movements at access and exit points, around the perimeter and within Company premises and construction sites.

Purpose and use of the data

CCTV is used for maintaining the security of Company premises and construction sites, preventing and investigating crimes and for Health and Safety purposes. It is also used to monitor employees, contractors and subcontractors carrying out work duties at our construction sites to ensure the integrity of the service delivery of construction projects to contractual programmes, design and quality specifications and to provide a time lapsed chronology of the construction phases.

Examples of CCTV usage may include:

- To assist in the prevention or detection of crime or malpractice.
- To assist in the identification and prosecution of offenders.
- To monitor the security of Company premises, construction sites, equipment and assets.
- To ensure that Health and Safety regulations and Company policies and procedures are followed - aids the identification and provides evidence of unauthorised actions or unsafe working practices that might result in disciplinary proceedings or sanctions against employees, contractors or sub-contractors.
- To monitor the quality of workmanship and the progress against contractual programmes for construction projects.
- To aid the compliance with legal obligations such as reporting to authorities.
- On occasions to use collected images for marketing and information purposes.

Collection and Retention of the data

To fulfil the described purposes the processing may include visual images, personal appearance, and behaviours of employees, customers and clients, visitors, contractors and subcontractors and members of the public. These can be collected whilst entering or inside our premises and sites, and from the immediate vicinity of the CCTV cameras area of surveillance at these locations.

The monitoring involves the collection or storage of information, including the creation of records, in a routine and passive manner. It also includes routine review of that information or those records. However, and for the avoidance of doubt, such monitoring does not involve actively investigating or keeping track of an individual's movements.

Recorded material will be stored in a way that maintains the integrity of the information. This is to ensure that the rights of individuals recorded by surveillance systems are protected and that the information can be used effectively for its intended purpose. The data will be stored and transmitted within a secure network at all times. Information technology devices used for storing CCTV output will be held in a



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secure location and all CCTV equipment will be regularly maintained to ensure it is working properly. In the event of the data being stored or processed on third party infrastructure e.g. cloud computing systems, then the Company will establish a data processor agreement with that provider to ensure their compliance with data protection regulations and principles.

The Company will undertake periodic deletion of the data held on the system. The frequency of deletion will depend upon the business requirements associated with the location of the CCTV installation and in accordance with the Company Records Control Schedule. In some instances, this will be 3 months but will be longer where the purpose of the data collection is to record all phases of a construction project, or where an investigation is being undertaken.

Access and disclosure

Access to, and disclosure of, CCTV images is restricted to ensure that the rights of individuals are protected. Only trained and authorised employees are allowed to access CCTV surveillance information. Access authorisation can only be provided by a member of the Board of Directors. The IT Manager will manage the additions and deletions of members of the internal security group holding access rights to CCTV installations.

Disclosure of images to other third parties will only be made in accordance with the purposes for which the system is used and will be limited to:

- The police and other law enforcement agencies, where the image recorded could assist in the prevention or detection of a crime, the identification and prosecution of an offender or the identification of a victim or witness.
- Prosecution agencies such as the Crown Prosecution Service.
- Relevant legal representatives.
- Company employees involved with Company disciplinary and performance management processes.
- Individuals whose images have been recorded and retained in accordance with the provisions and restrictions set out in the General Data Protection Regulation.
- Client or other project stakeholders.

Only members of the Board of Directors are permitted to authorise the disclosure of images to third parties. All requests for disclosure and access to images will be documented and will include, date, name, reason and if the request is accepted or denied.

Individuals access rights

The company recognises that General Data Protection Regulation provides individuals with rights over their personal information, which includes CCTV images, if they are recognisable from the image. This policy document, together with the company Data Protection Policy Statement and Privacy Notices, provides information on how the company collects and uses personal data.

The company will facilitate any requests from individuals wishing to exercise any of their rights under the regulations, relating to CCTV images, through its subject access request procedure. Full details are available in the Data Protection Policy Statement. Individuals can exercise their rights by submitting a request to Data Privacy Compliance at SDC Builders Ltd, Limegrove House, Caxton Road, Bedford, MK41 0QQ or Email: dataprivacy@sdco.co.uk

Notice of CCTV use

The Company provides appropriate notice to all individuals about CCTV installations at its premises and construction sites. Clear, visible and readable signage is installed at site entrances, on perimeter fences and within workplace areas containing details of the purposes of the surveillance and contact details for any enquires.



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CCTV use involving general public

The only occasion when the Company may inadvertently take surveillance information which involves the general public is when CCTV cameras capture images on the perimeter of the Company sites (although CCTV footage may capture visitors to sites). It is accepted that this data may include images of individuals who are under the age of 18 years of age.

The Company ensures that signage for its CCTV cameras is checked on a regular basis in order that the use of CCTV cameras at these locations is clear to all individuals including the general public.

In the event that the Company is required to disclose CCTV images to a third party it will take every reasonable step to ensure that any images of the general public, captured inadvertently, are removed or obscured from the release. If this is not possible then it will ensure that the third party has policies and procedures in place that respect the rights of individuals.

Review

This policy will be reviewed annually, or where there are changes in legislation that affect the policy.

Disciplinary

The Company may take disciplinary action, up to and including termination of employment, for any breach of this Policy.

Signed:

Francis Shiner
Managing Director

Signed:

Adam Knaggs
Deputy Managing Director

Signed:

Martin Lowndes
Finance Director

Signed:

Gary Wykes
Director

Signed:

Dan Changer
Director

Signed:

Andrew Shiner
Director

Signed:

Carl Bennett
Director

Signed:

Andrew Mitchell
Director

Date: **September 2020**

Next Review Date: **January 2021**