



## Entier CCTV Policy

|                               |                                                                                                                                                                                                                                                                                                                                                                                                                        |     |  |           |
|-------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|--|-----------|
| <b>Purpose of CCTV Policy</b> | <ul style="list-style-type: none"><li>This document outlines the Entier policy on the use of CCTV systems in The Olive House, Endeavour Drive, Arnhall Business Park, Westhill, Aberdeenshire, AB32 6UF (“<b>The Olive House</b>”) where Entier acts as controller under the GDPR in respect of such systems.</li></ul> <p>It does not include client sites where the client acts as controller for GDPR purposes.</p> |     |  |           |
| <b>Document Type</b>          | X Policy                                                                                                                                                                                                                                                                                                                                                                                                               | SOP |  | Guideline |
|                               |                                                                                                                                                                                                                                                                                                                                                                                                                        |     |  |           |
| <b>Version</b>                | 1.                                                                                                                                                                                                                                                                                                                                                                                                                     |     |  |           |
| <b>Operational Date</b>       | 01 February 2025                                                                                                                                                                                                                                                                                                                                                                                                       |     |  |           |

### Review Log

Include details of when the document was last reviewed:

| Name                                   | Date          |
|----------------------------------------|---------------|
|                                        |               |
| Data Protection Contact: Scott Jackson | February 2025 |
|                                        |               |
|                                        |               |

## 1. PURPOSE & SCOPE

The purpose of this policy is:

- (i) To assist operators of CCTV systems to understand their legal obligations with respect to the operation of CCTV on site at **The Olive House**
- (ii) This document applies to both: a) operators of CCTV (e.g. Entier staff and subcontractors) and b) data subjects at **The Olive House**

## 2. DEFINITIONS

The following words/phrases when referred to in the text of the policy will have the following meanings:

**“CCTV”** fixed and domed cameras designed to capture and record images of individuals and property.

**“Controller”** the Entier affiliate that determines the purposes and means for which any personal data is processed.

**“Personal Data”** any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. This includes CCTV images of identifiable individuals.

**“Data Processing”** performing any operation or set of operations on data, including:

- Obtaining, recording or keeping the data,
- Collecting, organising, storing, altering or adapting the data,
- Retrieving, consulting or using the data,
- Disclosing the data by transmitting, disseminating or otherwise making it available,
- Aligning, combining, blocking, erasing or destroying the data.

**“Data Subject”** all living individuals about whom we hold personal data as a result of the operation of our CCTV systems.

**“Data Controller”** the person or organisation that determines the purposes and means for which any personal data is processed.

**“Data Processor”** a person who processes personal information on behalf of a Data Controller

### 3. PURPOSE OF CCTV

Entier operates CCTV at **The Olive House** for the following purposes:

- (a) to assist in the prevention and detection of crime.
- (b) to help safeguard public safety.
- (c) for insurance requirements in connection with the defence or pursuit claims by Entier employees and customers; and
- (d) supporting the maintenance of health and safety standards.

Any viewing of CCTV footage, whether remotely or otherwise, should only be for the purposes detailed above.

### 4. LOCATION OF CAMERAS

The location of CCTV cameras and associated equipment should be carefully considered and in line with the purpose of the operation of the CCTV detailed in Section 3. CCTV cameras may record internal areas such as reception, delivery entrance in warehouse, front car park, side building and car park, rear of the building in line with fulfilling these purposes. To respect privacy, to the extent practicable, the cameras do not focus on rest rooms or rest areas. Monitoring of staff is not permitted except in accordance with the stated purpose of the CCTV. Please see Annex 1 to this policy for a full list of locations of where CCTV cameras are placed at this site.

### 5. SIGNS

Notification of CCTV usage can usually be achieved by placing easily read and well-lit signs in prominent positions. A sign at all entrances will normally suffice indicating the purpose of the CCTV system and the identity and contact details of the data controller. The signage should also give the information of who the data subject should contact if they required further information in relation to the collection of their personal data in connection with the operation of the CCTV. Recommended form of sign is included in Annex 2.

### 6. PROCESSOR

The CCTV system can only be accessed by the Data Protection Contact for the site and our processor(s). Details of Entier's Data Protection Contact for this site is listed in Annex 1.

## **7. STORAGE AND RETENTION OF IMAGES**

All recordings must be logged and traceable. For Digital Video Recorders (hard disk) systems, this means ensuring the system is set up to record and date and time stamp. The date and time recorded by the system must routinely be checked for correctness. Images must not be retained for longer than necessary. The default recommended period for retention of footage by Entier is 14 days at which point the footage is automatically overwritten. However, data may be retained for longer periods where in the opinion of Entier the footage will be of evidentiary value in connection with a legal claim or an employee performance or disciplinary matter.

## **8. VIEWING OF CCTV FOOTAGE**

Any third-party access to and disclosure of CCTV footage, where authorised in accordance with this policy, must be logged. It is important that access to, and disclosure of, CCTV images is restricted and carefully controlled, not only to ensure that the data privacy rights of individuals are preserved, but also to ensure that the chain of evidence remains intact where the images be required for evidential purposes. A sample log for viewing and disclosure is included at Annex 3 of this policy.

The Data Protection Contact will also need to ensure that the reason(s) for which they may disclose copies of the images are compatible with the registered reason(s) or purpose(s) for which they originally obtained those images.

Viewing of live images on monitors must be restricted to the CCTV specialist operator (eg security subcontractor) unless specifically authorised by the Data Protection Contact for the relevant location. Please see Annex 1 for details of the Data Protection Contact for this site. Recorded images must be viewed in a restricted area, such as a designated secure office. All access to the medium on which the images are recorded by third parties must be documented with the information included in Annex 3.

## **9. DATA SUBJECT ACCESS RIGHTS**

Under certain circumstances, Data Subjects have the legal right to:

- (a) request access to your personal data which may include CCTV images (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it;
- (b) request erasure of your personal data which may include CCTV images. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also

have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below);

(c) object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground; and

(d) request the restriction of processing of your personal data which may include CCTV images.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please complete the form in Annex 4 and submit it to the Data Protection Contact at **The Olive House**, where possible also copying Data Privacy team at [gdpr@entier-services.com](mailto:gdpr@entier-services.com). In order for us to locate relevant footage, any requests relating to CCTV images must include the date and time of the recording, the location where the footage was captured and, if necessary, information identifying the data subject making the request. In most instances you will not have to pay a fee to exercise any of your rights. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive.

All staff involved in operating the equipment must be able to recognise a request for access. Individuals requesting access verbally should be provided with a standard subject access request form, known as the (i) Data Subject Request Form (Annex 4); and (ii) this policy. For further information on managing Data Subject Access Requests for CCTV footage Entier staff should please refer to the SOP: CCTV DSAR Management. If you have any questions on this policy or the SOP: CCTV DSAR Management, please contact your privacy compliance officer directly or email the Data Privacy team at [gdpr@entier-services.com](mailto:gdpr@entier-services.com).

## 10. OTHER DISCLOSURES

### **Third parties**

Where we receive requests to view or copy CCTV images, these must be referred to the Data Protection Contact and will be considered on a case-by-case basis.

### **Editing Companies**

If it is decided that images will be disclosed to data subjects, the images of third-party individuals in the footage will need to be disguised or blurred so that they are not readily identifiable. If the system does not have this type of facility, then an editing company will need to be contracted to perform this function. If an editing company is hired, the Data Protection Contact will need to ensure that the editing company has been approved by the privacy compliance team and that there is a written contract with data processing protections in place.

### **General**

Downloaded footage should be held on a password protected or encrypted storage device in a safe or other secure restricted access area. For further information on managing Data Subject Access Requests for CCTV footage Entier staff should please refer to the SOP: CCTV DSAR Management.

## 11. **ROLES & RESPONSIBILITIES**

**Entier** as controller is accountable for the manner in which it utilises CCTV.

**Data Protection Contact** is the Entier employee at the Entier site who is responsible for the management of CCTV. Depending on the nature of the site this could be the Site Manager, Store Manager or Office Facilities Coordinator. The Data Protection Contact is responsible for ensuring the completion of Annex 1 with the specifics of each Entier site. The Data Protection Contact is responsible for ensuring that systems and procedures are in place on the site for which they have responsibility to ensure compliance with this policy. They are also responsible for ensuring that all subcontractors to whom responsibility for CCTV management is delegated are provided with a copy of this policy and affirm in writing that they acknowledge and accept its contents. Where a Data Protection Contact is unavailable (eg on leave), responsibility for DSAR's should be designated to the DPC's manager.

**Privacy Compliance team** is responsible for Entier's compliance with applicable data protection legislation including the General Data Protection Regulation 2018. They are available to support and guide all Entier employees on the application of this policy and to answer questions generally relating to privacy compliance. Please contact your Privacy Compliance team at [gdpr@entier-services.com](mailto:gdpr@entier-services.com).

## Annex 1 - Location Specifics

a) Entier Site: The Olive House

b) Data Protection Contact: Scott Jackson

c) Processor details: Watson Alarms, Units 7 & 8, Balmacassie Commercial Centre, Ellon, Aberdeenshire, AB41 8QR; [www.watsonalarms.co.uk](http://www.watsonalarms.co.uk)

d) Location of cameras:

| Item | location                       | Camera No/Identifier | Type | Internal / External |
|------|--------------------------------|----------------------|------|---------------------|
| 1    | Reception                      |                      |      | Internal            |
| 2    | Delivery entrance in warehouse |                      |      | Internal            |
| 3    | Front car park                 |                      |      | External            |
| 4    | Side building and car park     |                      |      | External            |
| 5    | Overlooking sheds              |                      |      | External            |
| 6    | Rear of the building           |                      |      | External            |
| 7    | Other side of the building     |                      |      | External            |

e) Floor plan and further information re the cameras are available upon request

## **Annex 2 - Template CCTV sign**

### ***This area is under CCTV surveillance.***

Images of this area are being monitored and recorded for the purposes of crime prevention and public safety. This scheme is operated for or on behalf of Entier. Recordings are retained for 14 days. For more information in relation to the collection of your personal data in connection with the operation of the CCTV and/or to request a copy of the on-site CCTV privacy policy, contact the Entier manager on site or email [gdpr@entier-services.com](mailto:gdpr@entier-services.com)

**Below is posted at the front and side of the building along with QR code.**



**Area under camera surveillance**

Images of this area are being monitored and recorded for the purposes of crime prevention and public safety. This scheme is controlled by Entier Limited. Recordings are retained for 14 days. For more information please contact the site manager to see the detailed CCTV privacy notice, scan the QR code below or contact the data protection officer available under [gdpr@entier-services.com](mailto:gdpr@entier-services.com)



### Annex 3 - Template CCTV Access log

| Date | Nature of Request | Requesting party | Basis of Request | Transfer Security Measures |
|------|-------------------|------------------|------------------|----------------------------|
|      |                   |                  |                  |                            |
|      |                   |                  |                  |                            |
|      |                   |                  |                  |                            |

## Annex 4 – Template data subject request form for CCTV footage

|                                                                                                                                                                                                                                                                                      |  |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| Date of Data<br>Subject request:                                                                                                                                                                                                                                                     |  |
| <b>Your full name:</b><br><br>N.B – Please provide a <b>recent photograph</b> of the data subject so that we can identify them in the CCTV footage and ensure that we provide the correct footage and do not inadvertently breach the data privacy rights of any other data subject. |  |
| <b>Name of the Data Subject, if you are requesting someone else's data:</b>                                                                                                                                                                                                          |  |
| <b>If applicable, please provide proof of your authority to issue a DSR on behalf of data subject:</b>                                                                                                                                                                               |  |
| <b>Nature of Request (eg. access):</b>                                                                                                                                                                                                                                               |  |
| <b>The following details about the personal data your request relates to</b> (this will help us focus our search and process your request in the most expedient manner):                                                                                                             |  |
| Date(s) and time period:                                                                                                                                                                                                                                                             |  |
| Particular incidents:                                                                                                                                                                                                                                                                |  |
| <b>Contact details that we may use to communicate with you about your request and to provide you with your requested data:</b>                                                                                                                                                       |  |
| <b>Any other information you wish to share to help us find the requested information:</b>                                                                                                                                                                                            |  |
| <b>Signature of Requestor:</b>                                                                                                                                                                                                                                                       |  |