

CCTV Policy

1. INTRODUCTION

1.1 AEP Limited is a member of The West Group of Companies (hereafter, “we” “our” “us”) believe that the use of CCTV and other surveillance systems have a legitimate role to play in helping to maintain a safe and secure environment for all its staff and visitors. However, we recognise that this may raise concerns about the effect on individuals and their privacy. This CCTV Privacy Notice (“Privacy Notice”) is intended to address such concerns. Images recorded by surveillance systems may include personal data which must be processed in accordance with data protection legislation.

1.2 Our Data Protection Officer (DPO) has overall responsibility for ensuring compliance with relevant legislation and the effective operation of this Privacy Notice.

Any questions about this Privacy Notice should be directed to the DPO at DPO@westgroup.co.uk

2. ABOUT THIS NOTICE

2.1 We currently use CCTV to view and record areas and activity which may include individuals in specified locations in and around our premises located at:

Company Name	Company Address
AEP Compressed Air Technologies Limited	Devonshire Road, Heathpark, Honiton, Devon, EX14 1SG
AEP Compressed Air Technologies Limited	Unit 3, Pintail Business Park, 165 Christchurch Road, Ringwood, Hampshire, BH24 3AL
AEP Compressed Air Technologies Limited	Mill Close, Lee Mill Industrial Estate, Ivybridge, Plymouth, Devon, PL21 9GL

2.2 We have carried out a data privacy impact assessment (DPIA) to ensure we are balancing our need for CCTV with the impact on the privacy of data subjects.

2.3 This Privacy Notice outlines why we use CCTV, how we will use CCTV and how we will process data recorded by CCTV to ensure it is compliant with data protection law and best practice. It will also explain how to make a subject access request in respect of personal data created by CCTV.

2.4 We may update this Privacy Notice from time to time without consultation.

3. DEFINITIONS

3.1 For the purposes of this Privacy Notice, the following terms have the following meanings:

CCTV: means fixed and domed cameras designed to capture and record images of individuals and property.

Data: is information, which is stored electronically, or in certain paper-based filing systems. In respect of CCTV, this generally means video images. It may also include static pictures such as printed screen shots.

Data subjects: means all living individuals about whom we hold personal information as a result of the operation of our CCTV (or other surveillance systems).

Personal data: means data relating to a living individual who can be identified from that data (or other data in our possession). This will include video images of identifiable individuals.

Data controllers: are the people who, or organisations which, determine the way any personal data is processed. They are responsible for establishing practices and policies to ensure compliance with the law. We are the data controller of all personal data used in our business for our own commercial purposes.

Data users: are those of our employees whose work involves processing personal data. This will include those whose duties are to operate CCTV cameras and other surveillance systems to record, monitor, store, retrieve and delete images. Data users must protect the data they handle in accordance with this Privacy Notice and our Data Protection Policy.

Data processors: are any person or organisation that is not a data user (or other employee of a data controller) that processes data on our behalf and in accordance with our instructions (for example, a supplier which handles data on our behalf).

Processing: is any activity which involves the use of data. It includes obtaining, recording, or holding data, or carrying out any operation on the data including organising, amending, retrieving, using, disclosing or destroying it. Processing also includes transferring personal data to third parties.

Surveillance systems: means any devices or systems designed to monitor or record images of individuals or information relating to individuals. The term includes CCTV systems as well as any technology that may be introduced in the future that may capture information of identifiable individuals or information relating to identifiable individuals.



4. REASONS FOR THE USE OF CCTV

- 4.1 We currently use CCTV as outlined below. We believe that such use is necessary for legitimate business purposes, including:
- a) to prevent crime and protect buildings and assets from damage, disruption, vandalism, and other crime.
 - (b) for the personal safety of staff, visitors and other members of the public and to act as a deterrent against crime.
 - (c) to support law enforcement bodies in the prevention, detection, and prosecution of crime
 - (d) to assist in day-to-day management, including ensuring the health and safety of staff and others
 - (e) to assist in the effective resolution of disputes which arise in the course of disciplinary or grievance proceedings.
 - (f) to assist in the defence of any civil litigation, including health and safety incidents and accidents

This list is not exhaustive and other purposes may be or become relevant.

5. MONITORING

5.1 CCTV monitors the exterior of the buildings on the Sites including but not limited to the main entrance and secondary exits and limited parts of the interior of:

- (a) Devonshire Road, Heathpark, Honiton, Devon, EX14 1SG
- (b) Mill Close, Lee Mill Industrial Estate, Ivybridge, Plymouth, Devon, PL21 9GL

The CCTV monitors these areas 24 hours a day/ 7 days a week and this data is continuously recorded.

5.2 Camera locations are chosen to minimise viewing of spaces not relevant to the legitimate purpose of the monitoring. As far as practically possible, CCTV cameras will not focus on private homes, gardens or other areas of private property.

5.3 Images may be monitored by authorised personnel during working hours only.

5.4 Staff using surveillance systems will be given appropriate training to ensure they understand and observe the legal requirements related to the processing of relevant data.

6. HOW WE WILL OPERATE ANY CCTV

6.1 Where CCTV cameras are placed in the workplace, we will ensure that signs are displayed at the entrance of the surveillance zone to alert individuals that their image may be recorded. The signs will contain details of the organisation operating the system, the purpose for using the surveillance system and who to contact for further information, where these things are not obvious to those being monitored.

6.2 We will ensure that live feeds from cameras and recorded images are only viewed by approved members of staff whose role requires them to have access to such data. This may include HR staff involved with disciplinary or grievance matters. Recorded images will only be viewed in designated, secure offices.

7. USE OF DATA GATHERED BY CCTV

7.1 In order to ensure that the rights of individuals recorded by the CCTV system are protected, we will ensure that data gathered from CCTV cameras is stored in a way that maintains its integrity and security. This may include encrypting the data, where it is possible to do so.

7.2 We may engage data processors to process data on our behalf. We will ensure reasonable contractual safeguards are in place to protect the security and integrity of the data.

8. RETENTION AND ERASURE OF DATA GATHERED BY CCTV

8.1 Data recorded by the CCTV system will be stored. Data from CCTV cameras will not be retained indefinitely but will be overwritten on a rolling basis, approximately every 30 days.

8.2 At the end of their useful life, all images stored in whatever format will be erased permanently and securely. Any physical matter such as tapes or discs will be disposed of as confidential waste. Any still photographs and hard copy prints will be disposed of as confidential waste.

9. AUDIO RECORDINGS

9.1 Some of our Surveillance systems capture audio recordings. We do not routinely enable or use the audio recordings but if we were to do so, we would do it for legitimate purposes are set out in section 4 of this Privacy Notice.

9.2 We follow the same rules as for CCTV footage regarding data capture, downloading and sharing with third parties. When downloaded, we keep the data for legitimate purposes and in accordance with the law.

10. REQUESTS FOR DISCLOSURE

10.1 We may share data with any company in our group and other organisations, where we consider that this is reasonably necessary for any of the legitimate purposes set out above in paragraph 4.1.

10.2 No images or audio recordings from our CCTV cameras will be disclosed to any other third party, without express permission being given by the Data Protection Officer (DPO) or the Group IT Administrator. Data will not normally be released unless satisfactory evidence that it is required for legal proceedings or under a court order has been produced.

10.3 In other appropriate circumstances, we may allow law enforcement agencies to view or remove CCTV footage where this is required in the detection or prosecution of crime.

10.4 We will maintain a record of all disclosures of CCTV footage.

10.5 No images from CCTV will ever be posted online or disclosed to the media.



11. SUBJECT ACCESS REQUESTS

11.1 In certain circumstances, Data subjects may make a request for disclosure of their personal information, and this may include CCTV images (data subject access request). A data subject access request is subject to the statutory conditions from time to time in place and should be made to the DPO.

11.2 For us to locate relevant footage, any requests for copies of recorded CCTV images must include the date and time of the recording, the location where the footage was captured and, if necessary, information identifying the individual.

11.3 We reserve the right to obscure images of third parties when disclosing CCTV data as part of a subject access request, where we consider it necessary to do so.

12. REQUESTS TO PREVENT PROCESSING

We recognise that, in rare circumstances, individuals may have a legal right to object to processing and in certain circumstances to prevent automated decision making. For further information regarding these rights and other rights, please contact the DPO.

