

Introduction

The Board of ateb group limited ("the Company") and all subsidiary businesses are required to operate and managed so as to ensure that, customers and others who may be affected by the uses of closed circuit television (CCTV) images to provide a safe and secure environment for employees and for visitors to ateb's properties and premises, such as tenants, contractors and suppliers, and to protect ateb's property.

This policy sets out the use and management of the CCTV equipment and images in compliance with the General Data Protection Regulation (GDPR) and the CCTV Code of Practice.

ateb's CCTV systems records images only. There is no audio recording i.e. conversations are not recorded on CCTV.

Purposes of CCTV

The purposes of ateb installing and using CCTV systems include:

- To assist in the prevention or detection of crime.
- To assist in the identification and prosecution of offenders.
- To monitor the security of ateb's properties and premises.
- To ensure that health, safety, fire safety rules and ateb procedures are being complied with.

Location of cameras

Cameras are located at strategic points throughout ateb's group's properties and premises, principally at the entrance and exit points. ateb has positioned the cameras so that they only cover communal or public areas on ateb's properties and premises and they have been sited so that they provide clear images.

All cameras are also clearly visible.

Appropriate signs are prominently displayed so that employees, tenants, customers and other visitors are aware they are entering an area covered by CCTV.

Recording and retention of images

Images produced by the CCTV equipment are intended to be as clear as possible so that they are effective for the purposes set out above. Maintenance checks of the equipment are undertaken on a regular basis to ensure it is working properly and that the media is producing high quality images.

Images may be recorded either in constant real-time (24 hours a day throughout the year), or only at certain times, as the needs dictate.

As the recording system records digital images, any CCTV images that are held on the hard drive of a PC or server are deleted and overwritten on a recycling basis and, in any event, are not held for more than one month. Once a hard drive has reached the end of its use, it will be erased prior to disposal.

Images that are stored on, or transferred on to, removable media such as USB and/or CDs are erased or destroyed once the purpose of the recording is no longer relevant. In normal circumstances, this will be a period of one month. However, where a law enforcement agency is investigating a crime, images may need to be retained for a longer period.

Access to and disclosure of images

Access to, and disclosure of, images recorded on CCTV is restricted. This ensures that the rights of individuals are retained. Images can only be disclosed in accordance with the purposes for which they were originally collected.

The images that are filmed are recorded locally and held in a secure location. Access to recorded images is restricted to the operators of the CCTV system and to those line managers who are authorised to view them in accordance with the purposes of the system. Viewing of recorded images will take place in a restricted area to which other will not have access when viewing is occurring. If media on which images are recorded are removed for viewing purposes, this will be

documented.

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 images recorded could assist in the prevention or detection of a crime or 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.
- Line managers involved investigations and any kind.

The Department Line Managers is the only person who is permitted to authorise disclosure of images to external third parties such as law enforcement agencies.

All requests for disclosure and access to images will be documented, including the date of the disclosure, to whom the images have been provided and the reasons why they are required. If disclosure is denied, the reason will be recorded.

Individuals' access rights

Under GDPR, individuals have the right on request to receive a copy of the personal data that is held on the system about them, including CCTV images if they are recognisable from the image.

If you wish to access any CCTV images relating to you, you must make a written request to ateb for the supply of the images requested. Your request must include the date and approximate time when the images were recorded and the location of the particular CCTV camera, so that the images can be easily located and your identity can be established as the person in the images. ateb will respond promptly and in any case within 30 calendar days of receiving the request.

ateb will always check the identity of the person making the request before processing it.

ateb will first determine whether disclosure of your images will reveal third party information as you have no right to access CCTV images relating to other people. In this case, the images of third parties may need to be obscured if it would otherwise involve an unfair intrusion into their privacy.

If ateb is unable to comply with your request because access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders, you will be advised accordingly.

Staff training

ateb will ensure that all employees handling CCTV images or recordings are trained in the operation and administration of the CCTV system and on the impact of GDPR with regard to that system.

Implementation

ateb's Director and Managers are responsible for the implementation of and compliance with this policy and the operation of the CCTV system and they will conduct a regular review of ateb's use of CCTV. Any complaints or enquiries about the operation of ateb's CCTV system should be addressed to them.

CCTV Signage

It is a requirement of the GDPR to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded.

The CCTV sign should include the following:

- That the area is covered by CCTV surveillance and pictures are recorded
- The purpose of using CCTV
- The name of the property
- The contact telephone number or address for any enquiries