

CCTV POLICY

1 ABOUT THIS POLICY

1.1 Evie's Place Professional Dog and Cat Grooming (referred to as '**we**', '**us**' or '**our**') uses CCTV on our premises.

1.2 We recognise that the use of CCTV impacts our staff and visitors, so this policy lays out our reasons for using CCTV and how we process personal data we have recorded via CCTV.

1.3 The law formally recognises the value and risk of using people's personal data by creating obligations on organisations that use or access it. It also grants rights to the individuals whom the personal data relates to. This type of law is called data protection law. Personal data means any information that does or may identify a living individual.

1.4 This policy has been designed to explain how we use CCTV in accordance with data protection law and best practices.

1.5 This policy applies to anyone who enters our premises, whether they are a member of staff or a visitor. This policy is non-contractual and does not form part of the terms and conditions of any employment or other contract.

1.6 We may update this policy to reflect any changes to our business practices. Please check back to stay up to date with any amendments.

1.7 The Information Commissioner's Office (ICO) is the UK regulator and is responsible for checking that businesses comply with data protection law. The ICO handles complaints and can fine businesses that do not fulfil their data protection obligations.

2 WHO IS RESPONSIBLE FOR OUR USE OF CCTV

2.1 Under data protection law, we are a controller for your personal data. This means we decide how to use the information we hold about you and how long to keep it (in accordance with applicable data protection laws). We are registered as a controller with the Information Commissioner's Office (ICO) under registered number CSN7355649.

2.2 Dawn Oldham has overall responsibility for this policy and our CCTV systems. If you have any questions about our CCTV systems in general please contact them at dawn.oldham89@gmail.com and 07355835616.

2.3 Dawn Oldham is our Business Owner/ Pet Groomer and is responsible for advising and monitoring how we use personal data in our business practice. Our directors are responsible for making (and providing adequate resources to implement) any decisions, including whether to report a breach to the ICO.

2.4 If you have any questions about how we use personal data we obtain through CCTV please contact our Business Owner/ Pet Groomer at dawn.oldham89@gmail.com and 07355835616.

3 WHAT IS OUR LAWFUL BASIS FOR USING CCTV

3.1 Under data protection law, we need a legal reason (known as a lawful basis) for holding, collecting and using personal data.

3.2 In this instance, we use CCTV to pursue our **legitimate interests** (our justifiable business aims) but only if those interests are not outweighed by your other rights and freedoms (e.g. your right to privacy).

3.3 Where we rely on legitimate interests, this means that we have considered your rights and freedoms before putting up any CCTV cameras at our premises. We have also only done so where it was necessary for a particular purpose we identified (for example, to act as a deterrent against crime).

3.4 Prior to introducing any further CCTV at our premises, we will carefully consider whether it is appropriate to do so, including our legal basis and our purpose (covered below). This will involve us doing a data protection impact assessment (DPIA) and/or legitimate interests assessment (LIA) (where we rely on legitimate interests as a legal basis) as appropriate. Where we conduct either a DPIA or LIA, we will consider the necessity of using CCTV to pursue our aims and consider the possible risks to individuals and how these can be addressed or minimised.

4 WHY WE USE CCTV (THE PURPOSE)

4.1 We consider that our use of CCTV is necessary:

- to prevent crime and protect buildings and assets from damage, disruption, vandalism and other crime;
- for the personal safety of staff, visitors and other members of the public and to act as a deterrent against crime;
- to support law enforcement bodies in the prevention, detection and prosecution of crime;
- to assist in day-to-day management, including ensuring the health and safety of staff and others;
- to assist in the effective resolution of disputes which arise in the course of disciplinary or grievance proceedings.

4.2 If we identify any other reasons we use CCTV we will update this policy.

5 WE WILL TELL YOU WHERE CCTV IS IN OPERATION

5.1 We use CCTV to view and record individuals or activities on our premises, specifically:

- Groom Room interior and external driveway

5.2 We will ensure that notices are displayed at the entrance of each surveillance zone to alert individuals that their image may be recorded. Such notices will contain details of the organisation operating the system, the purpose for using the surveillance system and who to contact for further information.

5.3 No surveillance system will be used in areas where there is a reasonable expectation of privacy (for example, in toilets or changing rooms) unless, in very exceptional circumstances, it is judged by us to be necessary to deal with very serious concerns.

5.4 We will not engage in covert surveillance (this is where we don't make it clear that surveillance is taking place).

6 OPERATION AND MONITORING OF CCTV

6.1 CCTV cameras operate Internal - motion triggered, External 24 hours a day and this data is continuously recorded. Images are not actively monitored.

6.2 Camera locations are chosen to minimise viewing of spaces not relevant to the purposes we have identified above. As far as practically possible, CCTV cameras will not focus on private homes, gardens or other areas of private property adjacent to our premises.

6.3 Surveillance systems in the Groom Room also record sound.

6.4 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. Such members of staff will be given appropriate training to ensure they understand and observe the legal requirements related to the processing of relevant personal data.

6.5 Where CCTV cameras are placed in the workplace, approved members of staff may include HR staff involved with disciplinary or grievance matters.

6.6 Recorded images will only be viewed in designated, secure offices.

7 SECURITY OF PERSONAL DATA GATHERED BY CCTV

7.1 In order to ensure appropriate security and safety measures when using and storing personal data we have obtained from CCTV, we have put in place the following:

- we encrypt the personal data where it is possible to do so;
- Password protection and Biometric Security.

7.2 If there is an event or incident affecting your personal data that we have obtained through CCTV, we will keep you informed. We may also need to notify the regulator (where required under data protection law).

On premise data store

8 HOW LONG DO WE KEEP PERSONAL DATA OBTAINED FROM CCTV

8.1 In accordance with our obligations under data protection law, we should only keep personal data as long as required to fulfil the purposes we have identified to use that personal data.

8.2 Data from CCTV cameras will not be retained indefinitely but will be permanently deleted once there is no reason to retain the recorded information.

8.3 Exactly how long images will be retained for will vary according to the purpose for which they are being recorded. For example, where images are being recorded for crime prevention purposes, data will generally be kept for a period of 30 days unless we are concerned about a pattern of behaviour, in which case we may keep the data for such period as is necessary for incidents to come to light. In all other cases, recorded images will be kept for no longer than 30 days.

8.4 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 YOUR RIGHTS IN RELATION TO CCTV PERSONAL DATA

9.1 Under data protection law, you have various rights in relation to your personal data.

9.2 We may need to ask for your identification before providing you with access to these rights. We can decide not to take any action in relation to a request where we have been unable to confirm your identity (this is one of our security processes to make sure we keep information safe) or if we feel the request is unfounded or excessive. We may charge a fee where we decide to proceed with a request that we believe is unfounded or excessive. If this happens we will always inform you in writing.

9.3 Your rights in relation to CCTV are:

Access: You must be told if your personal data is being used and you can ask for a copy of your personal data as well as information about how we are using it to make sure we are abiding by the law. At times, we may be restricted from doing this where CCTV footage also shows information about another individual, but we will inform you if this is the case.

Correction: You can ask us to correct your personal data if it is inaccurate or incomplete. Whilst you cannot change the contents of the video, you may wish to change how we record information about the video. We might need to verify the new information before we make any changes.

Deletion: You can ask us to delete or remove your personal data if there is no good reason for us to continue holding it or if you have asked us to stop using it (see below). If we think there is a good reason to keep the information you have asked us to delete (e.g. to comply with regulatory requirements, or we have been asked to preserve CCTV information by the police), we will let you know that we cannot delete it and explain our decision.

Restriction: You can ask us to restrict how we use your personal data and temporarily limit the way we use it.

Objection: You can object to us using your personal data if you want us to stop using it. If we think there is a good reason for us to keep using the information, we will let you know and explain our decision.

Portability: You can ask us to send you or another organisation an electronic copy of your personal data.

Complaints: If you are unhappy with the way we collect and use your personal data, you can complain to the Information Commissioner at <https://ico.org.uk/make-a-complaint> or another relevant supervisory body, but we hope that we can respond to your concerns before it reaches that stage.

10 CONTACT US

10.1 If you wish to make any of the right requests listed above, or have any questions or complaints about how we use personal data obtained through CCTV, please contact hello@eviesplace.co.uk.