

## Tranwell Farm Campsite

### CCTV POLICY

#### Introduction

The Company uses closed circuit television (CCTV) images to protect the Campsites property and to provide a safe and secure environment for employees and visitors to the Campsite. This policy sets out the details of how the Company will collect, use and store CCTV images.

For more information on your privacy rights associated with the processing of your personal data collected through CCTV images please refer to the Company privacy notice and data protection policy.

The Company's CCTV facility, unless there are exceptional circumstances will only record images. There is no audio recording i.e. conversations are not recorded on CCTV.

#### Purposes of CCTV

The Company has carried out a data protection impact assessment and on the basis of its findings it considers it necessary and proportionate to install and use a CCTV system. The data collected from the system will assist in:

- Prevention or detection of crime or equivalent malpractice.
- Identification and prosecution of offenders.
- Monitoring of the security of the Campsite and guests property.
- Ensuring that health and safety rules and Company procedures are being complied with.
- Identification of unauthorised actions, unacceptable or dangerous guest behaviour and to assist in providing relevant evidence.

#### Location of cameras

Cameras are located at strategic points throughout the Campsite, principally at the welcome hut and the exterior of the shower block.

The Company has positioned the cameras so that they only cover communal or public areas on the Campsite and they have been sited so that they provide clear images. No camera focuses, or will focus, on toilets, shower facilities or changing rooms.

All cameras are also clearly visible.

Appropriate signs are prominently displayed so that employees, clients, 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 of the business dictate.

The recording system records digital images, any CCTV images onto a sd card and overwritten on a recycling basis and, in any event, are not held for more than 14 days. Once a sd card 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 CDs or which are stored digitally are erased or destroyed once the purpose of the recording is no longer relevant. In normal circumstances, this will be a period of 14 days. 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.

Viewing of recorded images will take place in a restricted area to which other employees 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.
- Individuals whose images have been recorded and retained (unless disclosure would prejudice the prevention or detection of crime or the apprehension or prosecution of offenders).

The Managing Director of the Company (or another senior director acting in their absence) 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 the UK's data protection laws, including the General Data Protection Regulation (GDPR), individuals have the right on request to receive a copy of the personal data that the Company holds 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 the to Tranwell Farm Holidays. This can be done by using this email address

tranwellcampsite@gmail.com. The Company will usually not make a charge for such a request, but we may charge a reasonable fee if you make a request which is manifestly unfounded or excessive, or is repetitive. 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.

The Company will usually respond promptly and in any case within one month of receiving a request.

However, where a request is complex or numerous the Company may extend the one month to respond by a further two months.

The Company will always check the identity of the employee making the request before processing it.

The Data Protection Officer Sarah will always 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 the Company 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.

#### Covert recording

The Company's Data Protection Officer Sarah is 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 the Company's use and processing of CCTV images and ensure that at all times it remains compliant with the laws regulating data protection and privacy.

Any complaints or enquiries about the operation of the Company's CCTV system should be addressed to Tranwell Farm Campsite

#### Data Protection

The Company will process the personal data collected in connection with the operation of the CCTV

policy in accordance with its data protection policy and any internal privacy notices in force at the relevant time. Inappropriate access or disclosure of this data will constitute a data breach and should

be reported immediately to Tranwell Farm Campsite in

accordance with the Company's data protection policy. Reported data breaches will be investigated and may lead to sanctions.