

dormakaba UK & Ireland CCTV Policy

Locations: Warehouse & Buildings of,

- Bolton
- Willenhall ([see ADT CCTV policy](#))
- Lichfield
- Hitchin
- Tiverton
- Falkirk
- Tyne & Wear (see [Hepburn Properties Ltd CCTV Policy](#))
- Ireland (see [Space Storage CCTV Policy](#))

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1. Introduction

- 1.1. dormakaba has in place a CCTV surveillance system “the CCTV system” across its UK sites Bolton, Willenhall, Lichfield, Hitchin, Tiverton, Falkirk, Tyne & Wear & Ireland. This policy details the purpose, use and management of the CCTV system at dormakaba and details the procedures to be followed to ensure that dormakaba complies with relevant legislation and the current Information Commissioner’s Office CCTV Code of Practice.
- 1.2. dormakaba will have due regard to the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR) and any subsequent data protection legislation, and to the Freedom of Information Act 2000, the Protection of Freedoms Act 2012, and the Human Rights Act 1998. Although not a relevant authority, dormakaba will also have due regard to the Surveillance Camera Code of Practice, issued under the Protection of Freedoms Act 2012 and the 12 guiding principles contained therein.
- 1.3. This policy is based upon guidance issued by the Information Commissioner’s Office, ‘In the picture: A data protection code of practice for surveillance cameras
- 1.4. This policy and the procedures therein detailed, applies to all dormakaba CCTV systems including covert installations and any other system capturing images including static and moving CCTV of identifiable individuals for the purpose of viewing and or recording the activities of such individuals. CCTV images are monitored and recorded in strict accordance with this policy.

2. CCTV System overview

- 2.1. The CCTV system is owned by dormakaba and managed by Facilities Management Under current data protection legislation, dormakaba is the ‘data controller’ for the images produced by the CCTV system. The CCTV system operates to meet the requirements of the Data Protection Act and the Information Commissioner’s guidance.
- 2.2. The Facilities Management within the Operations department is responsible for the overall management and operation of the CCTV system, including activities relating to installations, recording, reviewing, monitoring, and ensuring compliance with this policy.
- 2.3. Signs are placed at the location points at Bolton, Willenhall, Lichfield, Hitchin, Tiverton, Falkirk, Tyne & Wear, and Ireland to inform staff, visitors, and members of the public that CCTV is in operation.
- 2.4. The Facilities Management within the Operations department alongside the Directors are responsible for ensuring that adequate signage is erected in compliance with the ICO CCTV Code of Practice for the CCTV at the location points Bolton, , Lichfield, Hitchin, Tiverton, Falkirk. Tyne & Wear is managed by Hepburn Properties Ltd. Ireland is managed by Space

Storage. Willenhall is managed by ADT. Please contact our Data Protection Officer for a copy.

- 2.5. Cameras are sited to ensure that they cover dormakaba premises as far as is possible. Cameras are installed throughout dormakaba sites including roadways, car parks, buildings, within buildings and externally in vulnerable public facing areas.
- 2.6. Cameras are not sited to focus on private residential areas
- 2.7. Cameras do not overlook residential areas. The CCTV system is operational and is capable of being monitored for 24 hours a day, every day of the year.
- 2.8. The CCTV system is subject to a Data Protection Impact Assessment. Any proposed new CCTV installation is subject to a Data Protection Impact Assessment. Any new CCTV Camera installation is subject to a privacy assessment.

3. Purposes of the CCTV system

3.1. The purposes of dormakaba CCTV system are as follows: -

- for the prevention, reduction, detection and investigation of crime and other incidents
- to ensure the safety of staff and visitors
- to assist in the investigation of suspected breaches dormakaba regulations by staff, visitors or other
- The monitoring and enforcement of attendance, theft and damage to property related matters.
- The CCTV system will be used to observe dormakaba Bolton, Willenhall, Lichfield, Hitchin, Tiverton, Falkirk, Tyne & Wear & Ireland, and areas under surveillance to identify incidents requiring a response. Any response should be proportionate to the incident being witnessed.

3.2. dormakaba seeks to operate its CCTV system in a manner that is consistent with respect for the individual's privacy

4. Monitoring and Recording

4.1. At Tiverton, the cameras are monitored in the Maintenance & Operation Manager's, Sales office, & Reception. Lichfield cameras are monitored via an app with limited secure access, the Bolton CCTV is monitored in the Branch Manager's office which is a secure area, the Willenhall CCTV is monitored in the ESA Managers office, the ESA Manager, Production Manager and Branch Manager also have remote viewing capabilities with ADT monitoring out of hours and Hitchin CCTV is monitored via the secure dormakaba access control installation by the Operations Manager. The Falkirk CCTV is in the Branch Managers office

which is a secured area. Please see Hepburn Property Ltd's CCTV policy for Tyne & Wear. Please see Space Storage CCTV policy for Ireland.

- 4.2. Images are recorded centrally on the app, site director's pc and servers located securely and are viewable by authorised personnel only. Additional staff may be authorised by the director with guidance from the Data Protection Officer to monitor cameras sited within their own areas of responsibility on a view only basis.
- 4.3. The cameras installed provide images that are of suitable quality for the specified purposes for which they are installed, and all cameras are checked daily to ensure that the images remain fit for purpose and that the date and time stamp recorded on the images is accurate.
- 4.4. All images recorded by the CCTV System remain the property and copyright of dormakaba.
- 4.5. The monitoring of staff activities will be carried out in accordance with Part 3 of the Employment Practices Code.2
- 4.6. The use of covert cameras will be restricted to rare occasions, when a series of criminal acts have taken place within a particular area that is not otherwise fitted with CCTV. A request for the use of covert cameras will clearly state the purpose and reasons for use and the authority of the Data Protection Officer will be sought before the installation of any covert cameras. The Data Protection Officer should be satisfied that all other physical methods of prevention have been exhausted prior to the use of covert recording.
- 4.7. Covert recording will only take place if informing the individual(s) concerned would seriously prejudice the reason for making the recording and where there are reasonable grounds to suspect that illegal or unauthorised activity is taking place. All such monitoring will be fully documented and will only take place for a limited and reasonable period.

5. Compliance with Data Protection Legislation

5.1 In its administration of its CCTV system, dormakaba complies with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. Due regard is given to the data protection principles embodied in GDPR. These principles require that personal data shall be:

- processed lawfully, fairly and in a transparent manner
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
- adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed
- accurate and, where necessary, kept up to date
- kept in a format which permits identification of the data subjects for no longer than is necessary for the purposes for which the personal data is processed

- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.
- dormakaba ensures it is responsible for, and able to demonstrate compliance with GDPR

6. Applications for disclosure of images

Applications by individual data subjects

- 6.1. Requests by individual data subjects for images relating to themselves “Subject Access Request” should be submitted in writing to the Data Protection Officer at gdpr.GB@dormakaba.com
- 6.2. To locate the images on the dormakaba system, sufficient detail must be provided by the data subject to allow the relevant images to be located and the data subject to be identified.
- 6.3. Where dormakaba is unable to comply with a Subject Access Request without disclosing the personal data of another individual who is identified or identifiable from that information, it is not obliged to comply with the request unless satisfied that the individual has provided their express consent to the disclosure, or if it is reasonable, having regard to the circumstances, to comply without the consent of the individual.

Access to and disclosure of images to third parties

- 6.4. Where dormakaba is unable to comply with a Subject Access Request without disclosing the personal data of another individual who is identified or identifiable from that information, it is not obliged to comply with the request unless satisfied that the individual has provided their express consent to the disclosure, or if it is reasonable, having regard to the circumstances, to comply without the consent of the individual
- 6.5. A request for images made by a third party should be made in writing to the Data Protection Officer at gdpr.GB@dormakaba.com
- 6.6. In limited circumstances it may be appropriate to disclose images to a third party, such as when a disclosure is required by law, in relation to the prevention or detection of crime or in other circumstances where an exemption applies under relevant legislation.
- 6.7. Such disclosures will be made at the discretion of the Data Protection Officer, with reference to relevant legislation and where necessary, following advice from the Group Data Protection Officer

- 6.8. Where a suspicion of misconduct arises and at the formal request of the Investigating Officer or HR Manager/Advisor, the Data Protection Officer may provide access to CCTV images for use in staff disciplinary cases.
- 6.9. The Data Protection Officer may provide access to CCTV images to Investigating Officers when sought as evidence in relation to staff discipline cases.
- 6.10. A record of any disclosure made under this policy will be held on the CCTV management system, itemising the date, time, camera, requestor, authoriser, and reason for the disclosure.

7. Retention of Images

7.1 Unless required for evidential purposes, the investigation of an offence or as required by law, CCTV images will be retained for from the date of recording and images are automatically overwritten after this point for the following periods:

- 2 months at the Tiverton site
- 3 months at the Hitchin site
- 14 days at the Litchfield site
- *Please see ADT policy for Willenhall*
- 6 months at the Bolton Site
- 1 month at the Falkirk Site
- *Please see Hepburn Property Ltd CCTV policy for Tyne & Wear*
- *Please see Space Storage CCTV policy for Ireland*

7.2 Where an image is required to be held more than the retention period referred to in 7.1, the Data Protection Officer, or their nominated deputy, will be responsible for authorising such a request.

7.3 Images held more than their retention period will be reviewed on a 6-monthly basis at the Hitchin site, 2 monthly bases at the Tiverton site, and 12 months at the other sites listed above, and any not required for evidential purposes will be deleted.

7.4 Access to retained CCTV images is restricted to the Data Protection Officer and other persons as required and as authorised by the Data Protection Officer.

8. Complaints Procedure

8.1 Complaints concerning dormakaba use of its CCTV system or the disclosure of CCTV images should be made in writing to the Data Protection Officer at gdpr.GB@dormakaba.com

9. Monitoring Compliance

- 9.1. All staff involved in the operation of dormakaba CCTV System will be made aware of this policy and will only be authorised to use the CCTV System in a way that is consistent with the purposes and procedures contained therein.
- 9.2. All staff with responsibility for accessing, recording, disclosing, or otherwise processing CCTV images will be required to undertake data protection training.

10. Policy Review

- 10.1. dormakaba usage of CCTV and the content of this policy shall be reviewed annually by the Data Protection Officer with reference to the relevant legislation or guidance in effect at the time. Further reviews will take place as required.