

CCTV Policy

Issued by Luxury Leisure and RAL Ltd (The Company as appropriate to their respective employment).

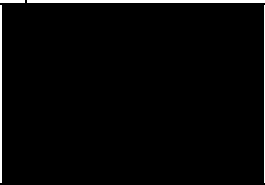
Contents

Section 1	Overview of the policy.....	Page 4
Section 2	Purposes of the CCTV system.....	Page 4
Section 3	Storage, monitoring and recording.....	Page 5
Section 4	Location of CCTV.....	Page 5
Section 5	Retention and disposal.....	Page 5
Section 6	Data Protection.....	Page 6
Section 7	Access and disclosure.....	Page 6
Section 8	Contact details.....	Page 7

Access

Effective date	15.03.2022
Accessible to	Luxury Leisure Talarius Staff
Location	Intranet

Approvals

Name	Signature	Title	Date	Version
Tom Allison		CEO	15.03.22	V2
Paul Hyman		COO	15.03.22	V2

Version

Date	Summary of changes	Author
September 2020	First issue V1.0	GW
February 2022	V2	JP
April 2023	V3 (Review)	JP
May 2024	V4 (Review and minor changes)	JP
March 2025	V5 (Review and no changes)	JP

This policy will be reviewed annually to ensure it remains appropriate, up to date and fit for purpose. Mark Thompson Director of Risk and Compliance or deputies are responsible for the review and approval of this document.

Section 1 Overview of the policy**1.1 Introduction**

Luxury Leisure Talarius (“we”, “us”, “our”) uses CCTV systems within our venues and offices. This policy aims to ensure that all CCTV systems installed and operated by Luxury Leisure Talarius comply with the law and that the scope, purpose, use and management of the systems are clearly defined.

The Head of Risk and Compliance is responsible for the overall management and operation of the CCTV system. This includes activities relating to installation, recording, reviewing, monitoring and compliance with this policy.

1.2 Scope of the policy

This policy applies to all employees, third parties and customers who may be present within our properties. It includes the use of all surveillance technology used by the Company.

1.3 Linked Documentation

- IT Business Continuity and Disaster Recovery Policy
- IT Security Policy
- IT User Account and Password Policy
- Data Protection Policy
- Security Manual – Crime Prevention – CCTV

Section 2 Purposes of the CCTV system

There are several purposes for the use of CCTV in our premises. These purposes will be reviewed on a regular basis to ensure they continue to be necessary and justified.

The CCTV system may be used for the following purposes:

- The detection, prevention, reduction and investigation of crime;
- Support with compliance of our regulatory requirements, for example, Social Responsibility;
- Facilitate with the investigation of suspected breaches of Company policies;
- Assist with health and safety and other serious occurrences;
- Create a safer environment;
- Detect, prevent and reduce any incidences of internal misconduct which could lead to disciplinary action.

The CCTV system can only be used for the purpose it was intended for. Any surveillance of employees or individuals within our business needs to be necessary, justified and proportionate. It can not be used as a tool to monitor staff performances. The misuse, tampering or unauthorised use of CCTV will be investigated and may lead to disciplinary action.

Section 3 Storage, monitoring and recording

Live footage and images captured by the CCTV system are monitored in a secure room within the premises. The CCTV may also be accessed by designated personnel via a secure, password protected app and the companies designated CCTV Officer. All monitoring of the CCTV system must be in accordance with the purposes set out in Section 2 of this Policy.

Images are recorded and stored on central servers with the appropriate technical and organisational measures in place. Disaster recovery and business contingency plans are also in position. The system is routinely checked to ensure it is working correctly.

Images must not be recorded or saved onto any personal equipment. Any footage that is downloaded must be saved on company approved, secure and encrypted devices. Use of a personal device in relation to CCTV may lead to disciplinary action.

The CCTV system can only be used for the purpose it was intended for. Any surveillance of employees or individuals within our business needs to be necessary, justified and proportionate.

The CCTV system can not be used as a tool to monitor staff performances. The misuse, tampering or unauthorised use of CCTV will be investigated and may lead to disciplinary action.

Section 4 Location of CCTV

CCTV cameras are positioned specifically to capture images to assist with the purposes for installing them.

Signage is displayed prominently to inform individuals that CCTV is in operation and images may be monitored and recorded.

Section 5 Retention and disposal

CCTV images will be retained for no longer than 3 months from the date of recording unless they form part of an investigation, required for evidential purposes or as required by law.

Access to retained images will be restricted to personnel who require it for the purposes listed above. These images must be reviewed regularly and disposed of securely once they are no longer required or necessary.

Any footage which has been downloaded must be disposed of using company approved, secure methods.

Section 6 Data Protection

All companies which use CCTV and other surveillance camera devices that view or record individuals and covers other information that relates to individuals must register with the Information Commissioners Office and comply with the Data Protection Act 2018 and General Data Protection Regulation ("GDPR").

The GDPR provides individuals with rights in regard to the processing of their personal data. Individuals are entitled to request a copy of their data if they are filmed on CCTV, subject to exceptions in the Data Protection Act 2018.

To apply for access to this information, individuals must email the Data Protection Officer with the following information:

- Dates and times of the footage they wish to see;
- Location where the footage was captured;

- Proof of identity;
- Suitable images of themselves so that they can be identified from the footage.

A response to the request will be received within 30 calendar days from receipt of all the required information. If the request is refused, full details and reasons will be provided.

Due regard is given to the data protection principles contained within Article 5 of the GDPR during the implementation stages and usage of the CCTV system.

Section 7 Access and disclosure

CCTV footage may only be accessed by authorised personnel who are sufficiently trained in the use of the system and are aware of their responsibilities.

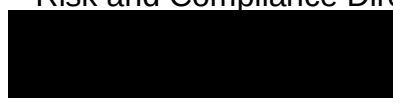
Judgements for disclosure should be made based on the purpose of the request. For example, footage must be supplied to the Police if they request the information for the prevention or detection of crime, the prosecution or apprehension of offenders and/or protecting the vital interests of a person under schedule 2 Part 1 Paragraph 2 of the Data Protection Act 2018 and GDPR Article 6(1)(d).

It is unlikely that footage can be provided to any third parties other than a law enforcement body. A data sharing agreement will be in place with any third parties we may need to share personal information with.

A record of requests and the release of CCTV footage must be sent to the Data Protection Officer and recorded in writing.

Section 8 Contact details

Data Controller: Mark Thompson
Risk and Compliance Director



Steve Suggett
National Security Manager



John Pope
Data Protection Officer



