

## Gena Property Management CCTV Policy

### Introduction

Some estates have closed circuit television (CCTV) installed to protect the property. This policy sets out the details of how we 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's privacy notice and data protection policy at [www.genapm.com](http://www.genapm.com).

There is no audio recording i.e. conversations are not recorded on CCTV.

### Purposes of CCTV

The data collected from the system will assist in:

- Prevention or detection of crime or antisocial behaviour
- Identification and prosecution of offenders.
- Monitoring of the security of the estate
- Ensuring that health and safety rules and procedures are being complied with.

### Location of cameras

Cameras are located at strategic points throughout some estates and only cover communal or public areas.

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.

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 estate 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, once the 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 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 12 months]. 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 centrally 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 employees will not have access when viewing is occurring.

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.
- Stakeholders and residents of the estate
- 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 Gena Property Management (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 Company's Data Protection Officer Sam Jackson. This can be done by using this email address [stewart.tan@genapm.com](mailto:stewart.tan@genapm.com). We 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.

We 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 Data Protection Officer Stewart Tan 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 we are 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

The Company 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 the laws regulating data protection and privacy with regard to that system.

### Implementation

Our Data Protection Officer Stewart Tan 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 Stewart Tan

### Data Protection

We 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 the Company's Data Protection Officer in accordance with the Company's data protection policy. Reported data breaches will be investigated and may lead to sanctions under the Company's disciplinary procedure.