

WREXHAM SELF STORAGE LIMITED

CCTV POLICY

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GENERAL MANAGER

APRIL 2020

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1) Introduction

- 1.1** Wrexham Self Storage Limited (WSS) has in place a CCTV surveillance system. This policy details the purpose, use and management of the CCTV system at our two adjacent Wrexham sites, and details the procedures to be followed in order to ensure that WSS complies with relevant legislation and the current Information Commissioner's Office CCTV Code of Practice
- 1.2** WSS will have due regard to the Data Protection Act 2018, The General Data Protection Regulation (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, WSS will also have due regard to the Surveillance Camera Code of Practice, issued under the Protection of Freedoms Act 2012, and in particular the 12 guiding principles contained therein
- 1.3** The policy is based upon the guidance issued by the Information Commissioner's Office 'In the picture': A data protection code of practice for surveillance cameras and personal information
- 1.4** This policy and procedures therein detailed, applies to all of WSS's CCTV systems. Images of which are monitored and recorded in strict accordance with this policy.

2) CCTV System Overview

2.1 The CCTV system is owned by Wrexham Self Storage Limited, Unit 427 Ash Road North, Wrexham LL13 9UF (and Unit 1b Wrexham Enterprise Park, Wrexham, LL13 9JT). Under current data protection legislation WSS is the 'data controller' for the images produced by the CCTV system. WSS is registered with the Information Commissioner's Office and the registration number is A8697617. The CCTV system operates to meet the requirements of the Data Protection Act and the Information Commissioner's guidance.

2.2 The General Manager is responsible for the overall management and operation of the CCTV system, including activities relating to installations, recording, reviewing, monitoring, and ensuring compliance with the policy.

2.3 The CCTV system operates across the WSS sites both internally and externally

2.4 Signs are placed at both pedestrian and vehicular entrances in order to inform visitors and members of the public that CCTV is in operation. The signage indicates that the system is managed by WSS.

2.5 The General Manager is responsible for ensuring that adequate signage is erected in compliance with the ICO CCTV Code of Practice.

2.6 Cameras are sited to ensure they cover Wrexham Self Storage Limited premises as far as is possible. Cameras are installed throughout the sites including roadways, car parks, offices, warehouses, and loading areas, both within buildings and externally in public facing areas.

2.7 The CCTV system is operational and is capable of being monitored for 24 hours a day, every day of the year.

3) Purposes of the CCTV system

3.1 The principal purposes of WSS's CCTV system are as follows

- for the prevention, reduction, detection, and investigation of crime and other incidents
- to ensure the safety of staff, customers, and members of the public
- the monitoring and enforcement of traffic related matters

3.2 The CCTV system will be used to observe WSS sites and areas under surveillance in order to identify incidents requiring a response. Any response should be proportionate to the incident being witnessed.

3.3 The CCTV system will be used to ensure the safety and security of both the internal and external storage areas.

3.4 Wrexham Self Storage Limited 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 Cameras are monitored in the main Reception Office for WSS, which is a secure area, the Digital Video Recorders (DVR's) are located at WSS, 427 Ash Road North, Wrexham, LL13 9UF (where the reception office is located) and at Unit 1b Preston Road, Wrexham, LL13 9JT.

4.2 The CCTV system can also be monitored by means of a remote phone App, accessible only to the General Manager of Wrexham Self Storage.

4.3 Images are recorded on said DVR's hard drive systems and are viewable in the relevant locations (see 4.1) by the General Manager.

4.4 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 the images remain fit for purpose and that the date and time stamp recorded on the images is accurate.

4.5 All images recorded by the CCTV System remain the property and copyright of WSS.

5) Compliance with Data Protection Legislation

5.1 In its administration of its CCTV system, WSS 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:

- a)** processed lawfully, fairly and in a transparent manner.
- b)** collected for specified, explicit and legitimate purposes for not further processed in a manner that is incompatible with those purposes.
- c)** adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.
- d)** accurate and, where necessary, kept up to date.
- e)** kept in a form which permits identification of the data subjects for no longer than is necessary for the purposes for which the personal data are processed.
- f)** processed in a manner that ensures appropriate security of the personal data including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organizational measures.

Wrexham Self Storage Ltd 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 WSS together with proof of identification.

6.2 In order to locate the images on the relevant WSS DVR hard drive systems, sufficient detail must be provided by the data subject in order to allow the relevant images to be located and the data subject to be identified.

6.3 Where WSS 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 A request for images made by a third party should be made in writing to the General Manager.

6.5 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 of or detection of crime, or in other circumstances where an exemption applies under relevant legislation.

6.6 Such disclosures will be made at the discretion of the General Manager, with reference to relevant legislation.

6.7 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 only be retained for the duration of the storage space in use on the specific DVR, and will be automatically overwritten at that point, normally within 7 days, but not exceeding 14 days.

7.2 Where an image is required to be held in excess of the retention period referred to in 7.1, the General Manager will be responsible for authorising such a request.

7.3 Any images held in excess of their retention period will be reviewed on a three-month basis and any not required for evidential purposes will be deleted.

7.3 Access to retained CCTV images is limited to the General Manager and other persons as required and authorised by said manager.

8) Complaints Procedure

8.1 Complaints concerning WSS's use of its CCTV system or the disclosure of CCTV images should be made in writing to the General Manager at: info@wrexhamselfstorage.com

8.2 All appeals against the decision of the General Manager with regard to the CCTV system should be made in the first instance in writing to Mr Richard Croft at Wrexham Self Storage Limited, 427 Ash Road North, Wrexham Industrial Estate, Wrexham, LL13 9UF

9) Monitoring Compliance

9.1 All staff involved in the operation of WSS's 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 The usage of CCTV by WSS and the content of this policy shall be reviewed annually by the General Manager with reference to the relevant legislation or guidance in effect at the time. Further reviews will take place as required.