

CCTV Privacy Notice

This notice sets out the appropriate actions and procedures which Parkstock Ltd (trading as Rowans) follows in respect of the use of Closed Circuit Television surveillance systems (“CCTV Systems”) at our premises.

Please note that our site is monitored by CCTV 24 hours a day. Rowans reserves the right for its employees and contractors to review footage as required and by entering onto our sites you consent to your image being recorded and reviewed and waive any and all claims in relation to the same. Recorded CCTV footage will be stored securely and retained in compliance with applicable laws. Rowans is registered as a Data Controller with the ICO, Registration Number: Z5223113.

In drawing up this notice, due account has been taken of the following:

1. The Regulation and any other relevant Data Protection legislation.
2. The CCTV Code of Practice produced by the Information Commissioner (“Code of Practice”);
and
3. The Human Rights Act 1998.

This notice will cover all employees and persons providing a service to Rowans, visitors and all other persons whose image(s) may be captured by our CCTV Systems.

We will also ensure that the personal data captured by our CCTV Systems is only processed in accordance with the following requirements:

- It will be processed fairly, lawfully and in a transparent manner.
- It will only be collected for specified, explicit and legitimate purposes and not further processed in any manner incompatible with those purposes.
- It will be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- It will be accurate and, where necessary, kept up to date.
- It will not be kept for longer than is necessary for the purposes for which the personal data are processed; and
- It will be processed in a manner that ensures appropriate security of the personal data.

Initial Assessment Procedures

Rowans's CCTV Officer has the legal responsibility for the day-to-day compliance with the requirements of this notice.

The purpose of the use of the CCTV Systems and the collection and processing of CCTV images is for the prevention or detection of crime or disorder, apprehension, and prosecution of offenders (including use of images as evidence in criminal proceedings), interest of public and employee Health and Safety, protection of public health and the protection of our property and assets and to ensure compliance with our policies and procedures.

Prior to any camera installation the CCTV Officer will ensure that the installation complies with this notice and that the use of any camera is justified, necessary and proportionate. The CCTV Officer will regularly assess whether the use of any camera and the CCTV System continues to be justified, necessary and proportionate.

Siting the Cameras

The location of the equipment is carefully considered because the way in which images are captured needs to comply with the Regulation.

All cameras are located in prominent positions within public and staff view and do not infringe on sensitive areas. All CCTV surveillance is automatically recorded, and any breach of this siting policy will be detected via controlled access to the CCTV System and auditing of the CCTV System.

Quality of the Images

The images produced by the equipment will as far as possible be of a quality that is effective for the purpose(s) for which they are intended. Upon installation, all equipment is tested to ensure that only the designated areas are monitored, and suitable quality pictures are available in live and play back mode. All CCTV equipment is maintained under contract which is reviewed annually.

Processing the images

Images which are not required for the purpose(s) for which the equipment is being used will not be retained for longer than is necessary. While images are retained, it is essential that their integrity be maintained, whether it is to ensure their evidential value or to protect the rights of people whose images may have been recorded. Access to and security of the images is controlled in accordance with the requirements of the Regulation.

All images are digitally recorded and stored securely within the system's hard drives. Images are stored for 30 days.

Where the images are required for any other purpose, for example system testing, evidential purposes or disciplinary proceedings, a copy file will be moved to an access controlled confidential location on the network and held until completion of the investigation. Viewing of images within the system is controlled by the CCTV Officer or a person nominated to act on their behalf. Only persons trained in the use of the equipment and authorised by the CCTV Officer can access data.

Access to and disclosure of images to third parties

Access to, and disclosure of, the images recorded by our CCTV System and similar surveillance equipment is restricted and carefully controlled. This ensures that the rights of individuals are preserved, and the continuity of evidence remains intact should the images be required for evidential purposes e.g. a police enquiry or an investigation being undertaken as part of an internal procedure.

Access to the medium on which the images are displayed and recorded is restricted to the CCTV Officer, Rowans' management and designated staff, and third parties as authorised from time to time for specific purposes. Access to and disclosure of images is for crime prevention purposes and as such could be given to the police.

Access to images by individuals

The Regulation gives any individual the right to request access to CCTV images which contain their personal data.

The CCTV system is managed and maintained by Rowans. Individuals who request access to images must submit this formally in writing to us via email. This will provide us with sufficient details to identify the section of footage they are concerned with and to enable Rowans to satisfy itself that the person making the request is the data subject of that specific recording. Upon receipt of the request, the CCTV Officer, or another member of staff authorised by them, will determine whether disclosure is appropriate and whether there is a duty of care to protect the images of any third parties. If the duty of care cannot be discharged, then the request can be refused.

A written response will be provided following receipt of a request. Requests for access to CCTV images must be sent to: info@rowans.co.uk

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact the Rowans Data Protection Officer at: info@rowans.co.uk

The most recent changes to this Privacy Notice were made on: 29 January 2024