

## **Data Protection Policy**

### **Introduction**

CCTV Monitoring Ltd. provides bespoke monitored security solutions to construction companies throughout the United Kingdom. The personal data that CCTV Monitoring Ltd. processes to provide these services relates to its customers and other individuals as necessary, including staff and others.

The policy outlines CCTV Monitoring Ltd.'s commitment to ensuring that any personal data which it processes is carried out in compliance with data protection law. CCTV Monitoring Ltd. ensures that good data protection practice is embedded in the culture of its staff and organization.

CCTV Monitoring Ltd.'s other data protection policies and procedures include:

- Privacy notices
- Data retention policy
- Record of processing activities
- IT security policy
- Personal data breach reporting and breach register

### **Definitions**

Personal Data is information that relates to an identifiable person who can be directly or indirectly identified from that information. For example, a person's name, identification number, location, online identifier. It can also include pseudonymized data.

Data Processing is any operation which is performed on personal data, whether or not by automated means, such as, but not limited to collection, recording or storage of data.

### **Scope**

This policy applies to all personal data processed by CCTV Monitoring Ltd. and is part of the company's approach to compliance with data protection law. This includes the UK Data Protection Act 2018 and all other relevant UK and EU data protection legislation. All employee's at CCTV Monitoring Ltd. are expected to comply with this policy and failure to comply may lead to disciplinary action for misconduct.

### **Data Protection Principles**

CCTV Monitoring Ltd. complies with the data protection principles outlined below. When processing personal data, the company will ensure that the data:

- Will be processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency')
- Must be collected for specific, explicit, legitimate and limited purposes ('purpose limitation')
- Is adequate, relevant and limited to what is necessary ('data minimisation')
- Is accurate and, where necessary, kept up to date ('accuracy')
- Will be kept in an identifiable form for no longer than necessary. If the data can be anonymized it may be stored for longer ('storage limitation')
- Is processed in a manner that ensures appropriate security ('integrity and confidentiality')

### **Rights of Individuals**

CCTV Monitoring Ltd. has processes in place to ensure that any requests made by individuals under data protection law can be facilitated. All requests will be considered without unnecessary delay and within one month of receipt.

Data subjects are allowed to exercise their rights covered, which are:

- The right to know how personal data is used in clear and transparent language.
- The right to know and have access to the personal data being held about them.
- The right to receive and transfer data in a common and machine-readable electronic format.
- The right to have their personal data removed.
- The right to have data corrected where it is inaccurate or incomplete.
- The right to complain and object to processing.
- The right to limit the extent of the processing of the individual's personal data according to their wishes.
- The right not to be subject to decisions without human involvement.

## **Security**

All employees of CCTV Monitoring Ltd. are aware that personal data must be securely controlled.

Any electronic data will be kept and stored in a confidential and secure manner using modern software. Access to said data will be limited to personal who require legitimate access. When data is computerised, it will be coded and encrypted on both a local hard drive and a network drive that is backed up. If data is stored on portable storage, that device must be stored in locked storage when not in use and any data that is stored must be encrypted. Only necessary data will be stored on portable storage devices. When the data is deleted it will be done safely so that the data is irrecoverable. Appropriate back-up and disaster recovery solutions will also be in place.

CCTV Monitoring Ltd. tries to reduce the amount of data that is stored as a physical document. Where it is necessary to store personal data as a physical document it will be stored in locked storage and restricted to permissible people. When the data is no longer required it will be destroyed in such a way where the data is no longer legible.

## **Lawful Basis of Processing**

CCTV Monitoring Ltd. acknowledges that processing of personal data may be only carried out where a lawful basis exists, and the company has assigned a lawful basis against each processing activity. Where no lawful basis applies the company may seek to rely on the individuals consent to process data.

CCTV Monitoring Ltd. recognises the high standard attached to the processing of data. The company understands that consent must be freely given. Where consent is to be given the company will do so on a specific and individual basis where appropriate. Individuals will be given clear instructions on the desired processing operation, informed of the consequences of their consent and of their right to withdraw consent at any time.

## **Access to Data**

All individuals have a right to access the personal data that the company holds on them. To exercise this right, individuals should make a Subject Access Request. CCTV Monitoring Ltd. will comply with the request without delay and within one month unless, in accordance with legislation, the company decides that an extension is necessary. Individuals who make requests will be kept informed of any decision to extend the time limit.

Further information on making a subject access request is contained in the Subject Access Request Policy of CCTV Monitoring Ltd.

## **Responsibilities**

In order to protect the personal data of individuals, employees of CCTV Monitoring Ltd. who must process data as part of their role have been made aware of the company's policies on data protection.

The company also have appointed employees with responsibility for reviewing and auditing the data protection system.

CCTV Monitoring Ltd.'s appointed data protection officer is:

Claire Berry

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01924 849319

### **Third Party Processing**

Where CCTV Monitoring Ltd. engage third parties to process data on the company's behalf it will ensure that the third party takes such measures in order to maintain the company's commitment to protecting data.

### **Requirement to Notify Breaches**

All data breaches will be recorded in CCTV Monitoring Ltd.'s Data Breach Register. Where legally required, the company will report a breach to the Information Commissioner within 72 hours of discovery. The company will also inform the individual whose data was subject to breach if legally required.

### **Review**

The data protection policy will be regularly monitored and reviewed on a yearly basis or as and when required.