

CCTV Data Protection Policy

1. Introduction

The purpose of this policy is to outline how the Dolls London handles personal data captured via CCTV cameras, in compliance with relevant data protection laws, such as the **General Data Protection Regulation (GDPR)**, **Data Protection Act 2018 (UK)**, and other local regulations.

2. Purpose of CCTV Usage

The Dolls London installs CCTV systems for the following legitimate purposes:

- Ensuring the safety and security of employees, visitors, and property.
- Preventing and investigating crime, theft, and vandalism.
- Monitoring compliance with health and safety requirements.

CCTV will not be used for monitoring employee performance or for any non-specified purposes.

3. Lawful Basis for Data Processing

CCTV recordings will be processed under the following lawful bases:

- **Legitimate Interests:** CCTV is installed to protect the interests of the organization, its employees, and the public.
- **Legal Obligation:** To fulfill legal obligations related to safety, crime prevention, and investigation.
- **Consent:** In areas where explicit consent may be necessary, signage and other forms of notice will be provided to ensure that all individuals are aware of the presence of CCTV cameras.

4. Scope

This policy applies to all CCTV systems managed by the organization, whether internal or external, fixed or temporary. It also applies to the processing of any personal data captured by these systems, including video footage and still images.

5. Responsibilities

- **Data Controller:** The designated Director is the Data Controller responsible for determining the purpose and method of data processing. It ensures that all CCTV systems comply with data protection regulations.
- **Data Processors:** Third-party service providers who handle CCTV data on behalf of the organization are responsible for adhering to this policy and data protection laws.

6. Signage and Transparency

Clear and visible signage indicating the presence of CCTV cameras are placed throughout the premises where cameras are in operation.

7. Data Access and Rights

- **Access Requests:** Individuals whose images are captured by the CCTV system have the right to request access to their personal data, in line with data protection laws. Such requests should be made in writing to the designated Data Protection Officer (DPO).

- **Rights of Data Subjects:** Individuals have the right to request:
 - **Erasure of data** where it is no longer necessary for the purpose it was collected.
 - **Rectification** of inaccurate data.
 - **Restriction** of processing under certain circumstances.
 - **Objection** to processing on grounds related to their particular situation.

8. Data Retention

- **Retention Period:** CCTV footage will be retained for a maximum of **30 days**, unless a legitimate need arises to retain footage for a longer period (e.g., in the event of an ongoing investigation or legal proceedings).
- **Deletion:** After the retention period has expired, data will be securely deleted or overwritten.

9. Data Security

- **Access Control:** Access to CCTV data is strictly limited to authorized personnel who require it for legitimate purposes. This may include security staff, management, or law enforcement officials.
- **Storage:** All CCTV recordings will be stored securely using encryption and other security measures to prevent unauthorized access.
- **Transfer:** Data will only be transferred to third parties (e.g., law enforcement) when a lawful basis exists and when secure transfer mechanisms are in place.

10. Disclosure of Data

CCTV data will only be disclosed to third parties in compliance with legal obligations or in response to legitimate requests from law enforcement. Requests must be made formally, and only the minimum necessary footage will be shared.

11. Compliance and Breach Reporting

- **Monitoring Compliance:** The organization will regularly review its CCTV systems and this policy to ensure compliance with data protection laws.
- **Data Breaches:** In the event of a data breach involving CCTV footage, the organization will take immediate steps to assess and contain the breach. If the breach poses a significant risk to individuals, they will be informed, and the relevant data protection authority will be notified within the required time frame.

12. Review of Policy

This policy will be reviewed annually or whenever significant changes are made to CCTV systems, data protection laws, or organizational practices.

13. Contact Information

For any questions or concerns regarding this CCTV Data Protection Policy or for submitting access requests, please contact:

Data Protection Officer (DPO)

The Dolls London
81-83 Walton Street, London SW3 2HP

[Phone Number]

[Email Address]

This policy is designed to ensure that the organization's use of CCTV systems is compliant with data protection laws, respects individual privacy rights, and balances security needs with transparency and accountability.