# POLICY FOR THE USE OF CCTV

V1.2

June 2022



# BWTHYN • Llys Alaw • COTTAGE

Llys Alaw Luxury Holiday Let Capel Bangor Aberystwyth SY23 3NL

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## 1. Introduction

- 1.1 This policy explains the purpose, use, and management of the CCTV installations
- 1.2 The purposes of the CCTV installation is:
  - to promote a safe community environment
  - the protection of property, visitors, and other asset
  - the prevention, investigation, and detection of crime
  - the apprehension and prosecution of offenders
  - to monitor security of relevant buildings and areas
- 1.3 The CCTV system will not be used:
  - · to provide recorded images for the internet
  - to record sound when the holiday let is occupied
- 1.4 The principles of the policy are:
  - that individuals' rights are respected and protected
  - that the installation is operated fairly and within the law
  - that the CCTV system is only operated for the purposes for which it was set up
  - that the recorded material/data stored is fairly and lawfully processed
  - that recorded material/data is adequate, relevant, and not excessive
  - that recorded material/data is accurate, securely stored, and not kept for longer than is necessary
- 1.5 This policy and its operations will be subject to regular reviews and audits, no less than annually.

# 2. CCTV System overview and definitions

2.1 The CCTV system consists of four cameras

2.2 Cameras are located as follows: two on the front of the house (which is roadside.) These look over the two entrances from the road. There is one at the side of the house from the road, which is where visitors park. The second looks over the back door and the patio area at the rear of the property.

2.3 The cameras are fixed and cannot be moved. For the purposes of this Policy, all of the cameras are referred to as 'CCTV'.

2.4 The CCTV installations comprise all fixed cameras, signs, recording and playing equipment, information, material, data, and any ancillary equipment required for the operation of the installations (e.g., cabling, printers, power supplies.)

2.5 Recorded material/data means any material recorded by the installations, either in digital or analogue form on CD, PC computer system hard drive, hard copy prints, or any document copies. The recorded material/data are the property of the owners of Llys Alaw

2.6 The systems operate 24 hours per day for 365 days of the year.

## 3. CCTV Owners

3.1 The CCTV surveillance system is owned by:

Priscilla Jones Erwbarfe Farm Caravan Park Devil's Bridge Aberystwyth SY23 3JR

3.2 Priscilla Jones is the responsible person for the management and operation of the system, with other nominated individuals given authority to manage the day-to-day operations and ensure strict compliance with this policy.

# 4. Legal Compliance

4.1 The CCTV installations will be operated in accordance with applicable legislation including the Data Protection Act 1998 (DPA) and the General Data Protection Regulation (GDPR).

4.2 For the purposes of data protection legislation, Priscilla Jones is the data controller.

## 5. Access to images

5.1 The ability to review recorded and live images is limited to the owners only.

5.2 Access to recorded images may also be given to law enforcement agencies, subject to the requirements of the Data Protection Act.

5.2 No other staff may view images.

## 6. Applications to review images

6.1 Visitors to the Holiday Let may apply to have CCTV footage reviewed.

6.2 The request must be made in writing and detail:

- the date, time and location
- the reason for the request (which must comply with the purposes as laid out in 1.1 of this policy)

6.3 All requests should be made within 14 working days of the recording to ensure footage is not erased.

## 7. Retention and disposal

7.1 Unless required for evidential purposes or the investigation of a crime or otherwise required by law, recorded images will be retained for no longer than 28 days from the date of recording

7.2 At the end of their useful life all images on discs will be erased and securely disposed of.

# 8. Complaints Procedure and Enquiries

8.1 Complaints received in relation to the use of the CCTV system should be made to the property owners who will investigate.

8.2 Complaints in relation to the disclosure or image supply should be made in writing to the property owners.

8.3 For general enquiries in relation to CCTV and this policy please email: enquiries@erwbarfe.co.uk

## 9. Relevant Policies

- Company Data Protection Policy
- Company GDPR Policy
- HiK Connect Privacy Policy

# Appendix 1

#### **CCTV ACCESS REQUEST**

Under data protection legislation an individual has the right to request a copy of any personal information held about him/her whether hard copy, electronic or CCTV.

Please write to the owners, providing as much information as possible, should you wish to exercise your right in requesting disclosure of your data recorded on CCTV. Please include:

#### PERSONAL DETAILS

Applicant's full name: Applicant's postal address: Applicant's email address:

#### INFORMATION REQUIRED

It will assist us to find the CCTV data you require if you can tell us: Location/position of CCTV camera: Date image taken: Time image taken: Brief description of the applicant's appearance and likely activities captured by CCTV: A recent photograph may also be required to assist identification of the relevant images. Any other information that might assist us in finding the information required: Do you require a hard copy of the image or would 'viewing' the images be sufficient?

#### DECLARATION

Please include the words 'I confirm that all of the information I have provided is correct and that I am the Data Subject'. Signed: Date:

**OR:** 'I confirm that I am acting on behalf of the Data Subject and have submitted proof of my authority to do so'. Name: Postal address: Email address: Signed: Date:

#### PROOF OF IDENTITY

If you are the Data Subject, please supply evidence of your identity: i.e., photocopy of birth certificate, driving licence or passport in compliance with GDPR Regulations. If you are applying on someone else's behalf, please enclose documented authority to act on the Data Subject's behalf.

### **POSTAL ADDRESS**

After submitting the application, please check to ensure that all the information you have provided is accurate and all the required documents are enclosed. Please send the application to:

### **Priscilla Jones**

Erwbarfe Farm Caravan Park Hafnau – Park Office Devil's Bridge Aberystwyth SY23 3JR

## Notice to Customers

We have CCTV externally at this property. CCTV is used at the property purely for the purpose of security.

We also make guests aware that there is CCTV externally at the property at the time of booking.

The CCTV camera is in operation when the property is empty.

The CCTV is provided by Hik Connect and all images captured are saved on their server.

The CCTV is only accessed by the owners and is only operated for the intended purpose.

We do not use or sell any images captured on CCTV to any 3rd parties.

Our comprehensive CCTV policy, GDPR policy and the Hik Connect UK Privacy Policy are available to view on written request to:

Priscilla Jones Erwbarfe Farm Caravan Park Hafnau – Park Office Devil's Bridge Aberystwyth SY23 3JR