

## **Staff protocol for the management of the Oyster Quay CCTV System**

Its very important that any imagery that is recorded on the Oyster Quay CCTV system is used as per the data protection act.

Staff members are not normally required to access the imagers of the CCTV system but it may be necessary due to an emergency.

Currently only the Site manager as the authority the view any imagery, he in turn will contact the OQML Chairman or the deputy chairman should an incident occur. However, should they not be immediately available then a currently serving OQML director can be used.

**At no time can any leaseholder view any CCTV imagery for any reason.**

Should an incident occur and the police/insurance agent be involved then a copy can be made of the incident/footage requested and a record of the copy should be made by the site manager and stored in a safe place.

The site manager is in fact the DPA controller and must implement sufficient security measures to keep any captured video captured free from tampering and only accessible to suitably authorised personnel.

It is not necessary for the site manager to train temporary staff or staff that are in a probation period, because of the need for technical instructions for the use of the system and the fact that they would not generally be working in this area. The site manager should give them verbal instructions regarding the use of the CCTV system and its strict Data Protection requirements.

Any staff member not following these instructions will be instantly dismissed.

### **Oyster Quay CCTV Privacy Notice**

This privacy notice tells you what to expect when Oyster Quay Management Limited ("we" or "our") collects personal information about you via CCTV. We are committed to protecting your personal information, safety and security and are legally obliged to use your information in line with all applicable laws concerning the protection of personal data.

#### **What information do we collect about you?**

We may collect imagery via CCTV cameras located throughout Oyster Quay that identifies you.

#### **How will we use the information we collect about you?**

We may use CCTV imagery for a number of purposes including but not limited to the following:

- To maintain the safety and security of Oyster Quay, our residents, staff and visitors and their assets where possible
- To support the effective management of Oyster Quay and any incidents
- For investigative purposes or as evidence to support any formal follow-up to incidents
- In response to a subject access request
- To investigate anyone carrying out a criminal act within Oyster Quay

The lawful justification for collecting and using CCTV imagery is that there are legitimate interests to do so. CCTV imagery may be handled and used by the following recipients to maintain Oyster Quay's safe, secure and efficient operation:

- Our personnel
- Police/security services
- Regulatory bodies
- Our service providers

These arrangements are covered by information sharing agreements or permitted by law.

We will keep your information within Oyster Quay and our trusted third parties except where disclosure is required by law, for example to government bodies, law enforcement agencies or in response to a subject access request.

#### **How long will we keep your information?**

Normally your information will be retained for up to one month after which point it will be deleted. Imagery required for investigative or evidential purposes may be retained beyond this period and is securely disposed of upon completion/conclusion of the purpose for which it has been retained.

Imagery is retained in a secure environment and is only accessible by authorised personnel who have a legitimate reason to do so.

#### **What rights do you have over your personal data?**

You have the right to, where appropriate:

- Access your personal data by making a subject access request

- Rectification, erasure or restriction of the processing of your information
- Object to the processing of your information

To exercise your rights or contact us please write to our Data Protection Officer at:

PB & S, Data Protection Officer, 25 London Road, North End, Portsmouth. Hants. PO2 0BQ

Or email: [laurenm@psandb.co.uk](mailto:laurenm@psandb.co.uk)

What if you find our response unsatisfactory?

Should you find our response unsatisfactory, you have a right to lodge a complaint with the supervisory authority – the Information Commissioners Office (ICO). You can find out more information on the ICO website at <http://ico.org.uk/concerns/> regarding the complaints process.