

Upton Home Hardware Limited's CCTV PRIVACY POLICY

Respecting your privacy is essential to us. This is why we've set out our full CCTV Privacy Policy below.

To ensure that you're confident that we're using CCTV and other similar devices responsibly we've noted our obligations below. In this policy "CCTV" relates to Closed Circuit Television, and other surveillance systems that capture personal data including body cameras, ANPR equipment, automated recognition technologies, vehicle trackers and dash-cams.

1.1 Before installing the CCTV we carried out a privacy impact assessment to ensure we were balancing our need for CCTV with the impact on your privacy.

1.2 We have installed CCTV to:

- (a) prevent and detect crimes;
- (b) identify, apprehend and prosecute offenders;
- (c) dealing with any queries, complaints or enquiries;
- (d) ensure the security of our and your property and that of our partners and contractors;
- (e) ensure that our policies and procedures are being adhered to;
- (f) to assist in any investigations or any disciplinary or grievance issue;
- (g) monitor the security of our premises;
- (h) monitor adherence to health and safety provisions and policies;
- (i) monitor car parking

As well as being the purposes for which we use your personal information, all of the above are also legitimate reasons for us to use and store personal data

Images captured by CCTV may be monitored and recorded and kept for up to thirty days after the recording was made. After this time the recording stored on the hard drive of our CCTV system will usually be overwritten.

1.3 Any information captured by CCTV will be viewed in a restricted area and only by the DPO and any authorised people.

1.4 All CCTV is maintained and overseen by our DPO. They are responsible for carrying out compliance audits and reviewing the need for CCTV.

1.5 Where we capture your personal data using CCTV we will let you know by using signage explaining who to contact about the CCTV and where to find the relevant privacy notice.

1.6 You have the right to view any personal data recorded by our CCTV. We may take time though to redact the personal data of anyone else on the recordings. We will then give you the opportunity to view the recordings that have been identified. We may be able to supply you with

a copy of the recording unless that isn't technically possible or to do so puts us to disproportionate effort.

1.7 It is a criminal offence to misuse CCTV. YOUR RIGHTS IN RELATION TO YOUR PERSONAL INFORMATION

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider;
- the right to object to certain automated decision making processes using your personal information.

Please note that some of these rights to object may not always apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored in our CCTV system.

More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by emailing the Data Protection Officer dpo@uptonhomehardware.com.

If you are unhappy with the way we are using your personal information you can also complain to the ICO. However we would encourage you to contact us first to see if we can resolve your complaint.