
Gibtelecom Group

CCTV Policy

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Gibtelecom Group CCTV Policy	Version: V1

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1. Introduction

- 1.1 The Company uses closed circuit television (CCTV) images to provide a safe and secure environment for employees and visitors to the Company's business premises, and to safeguard the Company's property.
- 1.2 The policy outlines the use, purpose and management of the CCTV equipment and explains the procedures that must be followed in order to comply with relevant legislation including the Data Protection Act 2004 and the General Data Protection Regulations (GDPR).

2. CCTV System overview

- 2.1 The CCTV system is owned and managed by Gibtelecom Ltd, 15/21 John Mackintosh Square, Gibraltar. Under the Data Protection Act 2004 Gibtelecom Ltd is the 'data controller' for the images produced by the CCTV system.
- 2.2 The CCTV system operates across all Gibtelecom group premises.
- 2.3 Signs are placed at all pedestrian and vehicular entrances in order to inform staff, visitors and members of the public that CCTV recording is in operation. The signage indicates that the system is managed by Gibtelecom and a 24-hour contact number is provided.

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3. Purpose of Policy

- 3.1 The purpose of this policy is to regulate the use of Closed-Circuit Television Systems and its associated technology in the monitoring of both the internal and external premises under the remit of Gibtelecom.
- 3.2 The use and implementation of CCTV recording within the Gibtelecom premises is intended for the purposes of:
- Protecting the premises and equipment, both internally and externally.
 - Promoting the health and safety of employees and visitors.
 - Preventing malpractice and crime within the premises.
 - Assisting in identifying, apprehending and prosecuting offenders and assisting in providing relevant evidence.
 - In certain areas of the business - Compliance to PCI/DSS requirements

4. Scope

- 4.1 This policy relates directly to the location and use of CCTV monitoring, recording and subsequent use of such recorded material. The company will ensure that the use of any CCTV material is done so by having due regard to the Data Protection Act 2004 and the General Data Protection Regulations.

5. Justification for the use of CCTV

- 5.1 The Data protection Act 2004 requires that the data is “adequate, relevant and not excessive in relation to the purpose for which it is processed.” The use of CCTV systems by Gibtelecom has been justified in order to control and monitor the perimeter of Gibtelecom buildings for the purposes listed in 3.1 above.

6. Rights of data subjects

You have several legal rights in relation to the data that we hold about you, including the right to:

- 6.1 access the data we have about you. Information on how this can be done is found in Schedule 1 attached.
- 6.2 ask that we update your data if it is inaccurate or incomplete.
- 6.3 ask that we delete or erase your information in certain circumstances. Please note that there may be circumstances where you ask us to delete or erase your information, but we are legally entitled to retain it. There are also some instances where compliance with PCI-DSS requires 90 days’ worth of historical footage and as such cannot be deleted. All recordings over 90days are automatically overwritten.
- 6.4 request that we restrict the processing of your information in certain circumstances. Again, there may be circumstances where you ask us to restrict the processing of your information, but we are legally entitled to refuse that request.
- 6.5 receive and transmit that data in a portable format. Please note that this right only applies to information which you have provided to us.
- 6.6 withdraw your consent to the use of your information where we are relying on that consent. Please note that we may still be entitled to process your information if we have another legitimate reason (other than consent) for doing so.

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6.7 make a complaint with the Gibraltar Regulatory Authority (www.gra.gi) if you think that any of your rights have been infringed by us.

6.8 You can exercise your rights by contacting us using the details set out in the section 5 below.

1. Compliance with data protection legislation

1.1 In its administration of its CCTV system, Gibtelecom complies with the Data protection Act (DPA) 2004 and confirms that it processes personal data in compliance with the below principles stated in the legislation:

- Personal data is processed in a lawful, fair and transparent manner. In doing so, due regard must be given to the method in which the data was obtained.
- The purpose for which the data is collected must be specified, explicit and legitimate.
- Personal Data is at all times adequate, relevant and not excessive in relation to the purpose for which it is processed.
- Personal data is accurate and where necessary kept up to date.
- Personal data is not kept for no longer than is necessary for the purpose for which it is processed.
- Take appropriate security measures when processing personal data.

2. Monitoring compliance

2.1 All staff involved in the handling the CCTV system will be made aware of this policy and will only be authorised to use the CCTV system in compliance with the purposes and procedures contained within this policy.

2.2 All staff responsible for the use, access, and recording, disclosing and processing of CCTV images are required to undertake data protection training in accordance with the DPA 2004.

3. Retention of images

3.1 In most areas' footage will be retained for a period of 30 days however there are some areas in which the Company is required to keep footage for 90 days in order to comply with standards set by the PCI DSS. In these cases, unless it is deemed to be necessary on a lawful basis, CCTV images will be retained for a period lasting no longer than 90 days from the date of recording.

4. Complaints procedure

4.1 Complaints concerning the use of Gibtelecom CCTV system or disclosure of CCTV images should be made by contacting Gibtelecom's data protection officer at Rachel.holgado@gibtele.com.

5. Review

5.1 The policy will be reviewed and evaluated from time to time. On-going review and evaluation will take cognisance of changing information or guidelines.

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SCHEDULE 1 – Data Subject Access Requests

1. Customers requesting access to their personal data are required to complete the form and follow the relevant instructions found via the following link <https://www.gibtele.com/privacy-policy>.
2. Further advise and information can be obtained from Gibtelecom's Data Protection Officer (DPO) – Rachel Holgado on (+350) 20052297 – rachel.holgado@gibtele.com