



## **Fox's Holdings Ltd and subsidiary companies / CCTV Privacy Policy**

### CCTV Privacy Policy

#### 1. Purpose of a CCTV System

We use CCTV Systems to record images to assist in the provision of a safe and secure environment for the benefit of those who work at and visit Fox's Holdings Ltd and subsidiary companies, based at Fox's Marina IP2 8SA ("the company"), and for the protection of both our and our customers property located onsite.

Monitoring of CCTV Systems helps us to:

- maintain public safety.
- maintain the security of both our and our customers property.
- assist in the prevention of crime.
- reduce the fear of crime and offer reassurance to staff, berth holders and other stakeholders;
- and
- facilitate the apprehension and prosecution of offenders in relation to crime.

We consider the processing of personal data for these purposes to be in our legitimate interests so that we can have a safe workplace, chandlery, marina and boat yard.

#### 2. Who does this policy apply to?

The company's staff, contractors, berth holders, tenants and other visitors to properties based at Fox's Marina, Ipswich.

#### 3. Why do we have this policy?

The firm operates CCTV surveillance systems ("CCTV Systems") which cover most areas of the marina and boat yard, chandlery, as well as the Outlook bar and restaurant.

The use of CCTV surveillance has been recognised as a powerful tool in the fight against crime, both in its prevention and detection.

We have developed internal procedures to ensure integrity, confidentiality and ethics are not compromised. We are committed to ensuring that where we collect and use identifiable images of individuals obtained from a CCTV System, we do so in accordance with applicable data privacy laws.

This CCTV policy explains how we may use information that we obtain about you from one of our CCTV Systems. For further information on how we process personal information please contact [foxs@foxsmarina.com](mailto:foxs@foxsmarina.com) or refer to our Security and privacy Policy on our website.

## 4. Access and Disclosure

### 4.1 Control of Access

Access to our CCTV Systems and any associated recorded images which contain personal information ("Recorded Materials") is strictly controlled and is limited to those who need to have access in accordance with this policy. Any such access will only be given with the approval of one of our Directors.

Disclosure of Recorded Materials will only be provided to third parties for the purposes outlined above and in compliance with applicable data privacy laws.

In order to meet the stated purposes, it may be necessary for us to share recorded materials internally with our offices or associated entities.

### 4.2 Access purpose

Recorded Materials may only be viewed for the following purposes.

the investigation of an alleged crime; or  
the investigation of a security incident; or  
the investigation of a serious health and safety incident or accident.

Any authorised viewings shall be registered in a log.

Recorded Materials may be used by us after an incident to assist in the identification and detection of offenders or in the investigation of a security incident or in the investigation of a serious health and safety matter.

### 4.3 Disclosure to Police

The police should not require or be provided with access to any of our CCTV Systems except under the following circumstances;

emergencies or investigation of serious incidents;  
identification of offenders; or  
at our request (in accordance with this policy).

Recorded Materials will be supplied to the police for crime incidents on receipt of a formal request.

Any requests by police to remove CCTV recordings will be notified to a Director and will only be met where the request complies with applicable data privacy laws. Any such requests will also be registered in a log.

### 4.4 Access by You

The privacy laws of some jurisdictions give individuals the right to access, amend or delete their personal information or, in some circumstances, to restrict the processing of their personal information.

If you would like to request a copy of your data or would like to change or erase all or any part of the information we hold about you, please contact us as set out below.

## 5. CCTV Camera Locations

CCTV cameras are located at strategic points throughout our marina, boatyard and chandlery to provide extensive coverage of areas we believe are most at risk of crime or other incidents.

Where required by privacy laws, signage is displayed at appropriate points to alert employees and visitors that CCTV surveillance is in use and to provide our contact details for further information.

## 6. Security Measures

Any Recorded Materials shall be held securely and shall not be placed in areas accessible by our employees (other than those with requisite access rights), the public or be otherwise distributed.

We will take all reasonable precautions necessary to protect Recorded Materials from:

misuse, interference and loss; and  
unauthorised access, modification or disclosure.

## 7. Storage of CCTV footage

CCTV images and Recorded Materials shall not be retained for any longer than is required for the stated purpose. Ordinarily footage is only retained for as long as is necessary to fulfil the stated purpose. Recorded Materials will be deleted securely and promptly once the stated purpose has been fulfilled.

## 8. Covert CCTV

Covert CCTV will not be used by the firm other than in exceptional circumstances. Any such use requires the authorisation of a Director and will be given for a limited time and purpose only. Any decision to use covert surveillance must be registered in a log.

## 9. Contact and further information

If you have any questions about this CCTV Policy, or want to submit a written complaint about how we handle your personal information, please contact us via [foxs@foxsmarina.com](mailto:foxs@foxsmarina.com).

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