



CCTV PRIVACY NOTICE

Red Industries Group (RED) is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect personal information in relation to CCTV during your working relationship with us, in accordance with the General Data Protection Regulation (GDPR).

Red is a data controller. This means that we are responsible for deciding how we hold personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to current and former employees, workers and contractors. This notice does not form part of any contract of employment or other contract to provide services.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Data Protection Principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used fairly, lawfully and in a clear, transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely, including protecting against unlawful processing, accidental loss and destruction.

CCTV

The CCTV system records images within the boundaries at our facilities of Sneyd Hill, Brownhills, Head Office, Wednesbury, Walley's Quarry and Dudley.

The system does not have sound recording capabilities.

The cameras are installed in various locations around our site, including indoor and outdoor areas, but care is taken to ensure that reasonable privacy expectations are not violated.

The CCTV system is operational and capable of being monitored 24-hours a day, every day of the year. Signs are placed at prominent locations at the entrance(s) of our site and in further locations within our site to advise people that CCTV is in operation.

Therefore, the CCTV will collect, store and use the recording and images within the business.

Purpose of CCTV

RED has CCTV to:

- Assist with finding the root cause of investigations such as:
 - theft of company property;
 - theft of employee property;
 - damage to company property;
 - damage to employee property;

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- Improve health and safety management by assisting with investigations into breach of company procedures relating to health and safety;
- Providing assistance in the situation of emergencies;
- Improve security on site, therefore prevent acts of crime;
- Monitor and ensure compliance with regulatory requirements; and
- Prevent, reduce, detect and investigation incidents, employee or visitor misconduct.

CCTV will not operate in toilets, private offices or changing rooms, unless this is necessary for the investigation of a serious crime or there are circumstances in which there is a serious risk to health and safety or to the operation of the employer's business. CCTV will be used in this way only where it is a proportionate means of achieving the aim in the circumstances.

Covert CCTV will only ever be set up for the investigation or detection of crime or serious misconduct.

CCTV evidence may be used against an employee in disciplinary proceedings only where such evidence tends to show, in the reasonable belief of the employer, that he or she has been guilty of misconduct. The employee will be given a chance to see and respond to the images in these circumstances.

Covert recording

Covert CCTV will only ever be set up for the investigation or detection of crime or serious misconduct. The use of covert CCTV will be justified only in circumstances where the investigator has a reasonable suspicion that the crime or serious misconduct is taking place and where CCTV use is likely to be a proportionate means of securing evidence.

The company may only undertake covert recording with the written authorisation of a Director where informing individuals that recording is taking place would seriously prejudice the reasons for that process and/or there is good reason to suspect that illegal or unauthorised action is taking place.

CCTV will be installed only if it is a necessary and proportionate way of dealing with a problem. RED will ensure that all cameras are set up in a way that ensures that there is minimal intrusion of staff privacy, and that any intrusion is fully justified.

In areas of surveillance, signs will be displayed prominently to inform employees that CCTV is in use.

Any such monitoring will only be carried out for a limited period consistent with the objectives of the monitoring, and only for a specific, authorised activity.

All such monitoring will be documented showing the reasons that the covert monitoring was authorised.

Disclosure of images

The following people will have access to CCTV Footage:

- Chairman
- CEO
- Group Operations Director
- Group Technical Director
- Group Sales Director
- Chief Finance Officer
- Group Treatment and Transfer Manager
- Group Marketing Manager
- Operations Managers

Only a director can authorise the disclosure of images to the police or other law enforcement agencies.

We currently use GB Monitoring who can remotely monitor the CCTV images for safety, security and protection

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purposes. They are SIA (Service Industry Authority) Approved Contractors for the provision of CCTV.

Recorded images can be accessed by authorised persons only (password protected access to the system) via an online portal, with the exception of Walleys Quarry which as an onsite monitor. Efforts are made to ensure that security of the data and protect against loss, theft, or unauthorised access.

Retention of CCTV

Recordings will be held for 2 months, unless required to keep for longer by law enforcement and/or investigation purposes.

Images relating to an investigation may be held for the life of the site as required by our waste permit.

Individual access rights

Employees whose images are recorded have a right to view images of themselves and to be provided with a copy of the images. Employees would need to make a *Subject Access Request*, in line with the GDPR Policy. An employee may be asked to supply a photograph or a description of themselves, together with the relevant time and date of the image, so that they may be easily identifiable.

We reserve the right to refuse access to the CCTV footage where this would prejudice the legal rights or freedoms of other individuals, jeopardise an ongoing investigation, or falls under another exemption category as laid out by the Information Commissioners Office.

Data Protection Compliance / Office

The HR function will oversee the compliance of this privacy notice.

You have the right to make a complaint at any time to the Information Commissioners Office, the UK supervisory authority for data protection issues.

Miscellaneous

This procedure will be periodically reviewed. Any amendment to it will be notified to employees in writing by the organisation's Group HR Manager and such written advice will inform employees as to the date when any amendment comes into effect.

I have read and understand the CCTV Privacy Notice

Print Name

Signature

Date

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