

1. ABOUT THIS POLICY

The purpose of this policy is to regulate the use of Closed-Circuit Television (CCTV) images being processed, monitored and recorded for the purposes of crime prevention and detection as well as public safety.

2. APPLICATION AND CONSEQUENCES OF NON-COMPLIANCE WITH THIS POLICY

- 2.1. This policy applies to all staff of Boxer, which includes all permanent and temporary staff, contractors, and agency workers who are subject to the conditions and scope of this policy. Failure to comply may lead to disciplinary action, including summary dismissal (without notice or a payment in lieu of notice) or termination of contract or engagement (as appropriate) for serious or repeated breaches of this policy.
- 2.2. This policy also applies to customers entering our store premises or other visitors entering our offices.
- 2.3. It may also be the case that your conduct and or action(s) may be unlawful, and Boxer reserves the right to inform the appropriate authorities. Action(s) may result in civil or criminal proceedings. Staff should note that in some cases they may be personally liable for their actions and or conduct.

3. GENERAL PRINCIPLES

- 3.1. Boxer is committed to enhancing the quality of life of its employees, visitors and customers by integrating the best practices with regard to workplace and store safety with the state-of-the-art technology. A critical component of a comprehensive security program is the use of CCTV monitoring.
- 3.2. CCTV monitoring may be used in public areas by Boxer to deter crime and to assist in protecting customers, employees and property.
- 3.3. Information obtained via CCTV monitoring will be used exclusively for security and law enforcement purposes. Information obtained by CCTV monitoring will only be released when so authorised by the Risk Manager.
- 3.4. CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with existing Boxer policies and practices and will be limited to uses that do not violate the reasonable expectation of privacy of data subjects.
- 3.5. Images and related data collected by CCTV are the property of Boxer.

4. RESPONSIBILITIES

- 4.1. The Risk Manager is responsible for authorising all CCTV monitoring for safety and security purposes at Boxer and overseeing and coordinating the use of CCTV monitoring equipment at Boxer.
- 4.2. Boxer will monitor new developments in the law and industry standards in respect of CCTV monitoring.

5. PROCEDURES

- 5.1. Boxer will post signage where appropriate.
- 5.2. Individuals whose images are recorded have a right to view the images of themselves and to be provided with a copy of the images against the payment of a reasonable fee.
- 5.3. The CCTV systems used by Boxer will produce clear images which law enforcement bodies (such as the police) can use to investigate crime and that can easily be taken from the system when required.
- 5.4. CCTV cameras will be installed in positions where they can record clear images.
- 5.5. CCTV cameras will be positioned to avoid the capturing of images of persons not visiting the premises and those entering residential housing. (we have cameras outside in our parking areas) Any view given of housing will be no greater than what is available with unaided vision.

- 5.6. Images recorded by CCTV cameras will be securely stored and may only be accessed by authorised persons.
- 5.7. Images will not be provided to third parties other than law enforcement bodies.
- 5.8. Regular checks will be carried out to ensure that CCTV cameras are working properly and produce high-quality images.
- 5.9. CCTV monitoring will not be used in areas which workers would reasonably expect to be private, such as toilet areas and private offices.
- 5.10. The CCTV monitoring centre will be configured to prevent the tampering with or duplicating of information. (Where in place)
- 5.11. Recorded images will be stored for a period not exceeding 30 days and will then be erased, unless retained as part of a criminal investigation or court proceedings or other legitimate use as approved by the Risk Manager.: PCI compliance requirements.

6. CONSEQUENCES OF NON-COMPLIANCE

It is essential that all staff comply with all relevant parts of this policy. Any failure to comply with this policy could have serious consequences for Boxer and its employees. Failure to comply may lead to: disciplinary action, including summary dismissal (without notice or a payment in lieu of notice) for serious or repeated breaches; civil or criminal proceedings; and/or personal liability for those responsible.

For visitors or customers, civil or criminal proceedings may result from any alleged criminal incident or health and safety violations detected by CCTV monitoring.

7. POLICY REVISION

This policy has been reviewed and approved by the Risk Manager and Information Officer and is subject to change without prior notice.

8. CONTACT DETAILS OF THE RISK MANAGER AND INFORMATION OFFICER

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