Dormakaba UK & Ireland CCTV Policy

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Locations:

Warehouse & Buildings of,

- Lichfield
- Letchworth Spirella House (see Savills CCTV Policy)
- Tiverton – Lower Moor Way
- Bristol
- Wakes Coln – RTR
- Tiverton – Mountbatten Way

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1. Introduction

1.1. dormakaba has in place a CCTV surveillance system "the CCTV system" across its UK sites Lichfield, Letchworth Spirella House, Tiverton (both Lower Moor Way and Mountbatten Way) & Bristol. This policy details the purpose, use and management of the CCTV system at dormakaba and details the procedures to be followed to ensure that dormakaba complies with relevant legislation and the current Information Commissioner's Office CCTV Code of Practice.

1.2. dormakaba will have due regard to the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR) and any subsequent data protection legislation.

1.3. This policy is based upon guidance issued by the Information Commissioner's Office, 'Video surveillance: guidance for organisations.

1.4. This policy and the procedures therein detailed, applies to all dormakaba CCTV systems including covert installations and any other system capturing images including static and moving CCTV of identifiable individuals for the purpose of viewing and or recording the activities of such individuals. CCTV images are monitored and recorded in strict accordance with this policy.

2. CCTV System overview

2.1. The CCTV system is owned by dormakaba and managed by National site management Under current data protection legislation, dormakaba is the 'data controller' for the images produced by the CCTV system. The CCTV system operates to meet the requirements of the Data Protection Act and the Information Commissioner's guidance.

2.2. The National Site Manager is responsible for the overall management and operation of the CCTV system, including activities relating to installations, recording, reviewing, monitoring, and ensuring compliance with this policy.

2.3. Signs are placed at the location points at Lichfield, Letchworth Garden City, both Tiverton sites (Lower Moor Way and Mountbatten Way), and Ireland to inform staff, visitors, and members of the public that CCTV is in operation.

2.4. The Site Facilities Management alongside the Directors are responsible for ensuring that adequate signage is erected in compliance with the ICO CCTV Code of Practice for the CCTV at the location points Lichfield, Letchworth, Spirella House is managed by Savills, both Tiverton sites (Lower Moor Way and Mountbatten Way), & Bristol.

2.5. Cameras are sited to ensure that they cover dormakaba premises as far as is possible. Cameras are installed throughout dormakaba sites including roadways, car parks, buildings, within buildings and externally in vulnerable public facing areas. Internal cameras do not capture 'private' staff areas such as the entrance to toilets, the kitchen or the dining areas.

2.6. Cameras are not sited to focus on private residential areas.

2.7. Cameras do not overlook residential areas. The CCTV system is operational and is capable of being monitored for 24 hours a day, every day of the year.

2.8. The CCTV system is subject to a Data Protection Impact Assessment. Any proposed new CCTV installation is subject to a Data Protection Impact Assessment.

Any new CCTV Camera installation is subject to a privacy assessment.

3. Purposes of the CCTV system

3.1. The purposes of dormakaba CCTV systems are as follows: -

- for the prevention, reduction, detection and investigation of crime and other incidents
- to ensure the safety of staff and visitors
- to assist in the investigation of suspected breaches of dormakaba regulations by staff, visitors or others such as but not limited to:
- Theft or vandalism
- Unauthorised entry to site/trespass
- Suspicious/inappropriate behaviour
- Bullying &/or harassment
- Health & Safety violations
- The monitoring of staff and visitors' attendance, and enforcement of theft and damage to property related matters.
- The CCTV system will be used to observe dormakaba Lichfield, Tiverton (Lower Moor Way and Mountbatten Way) & Bristol, and areas under surveillance to identify incidents requiring a response. Any response should be proportionate to the incident being witnessed.

3.2. dormakaba seeks to operate its CCTV system in a manner that is consistent with respect for the individual's privacy.

4. Monitoring and Recording

4.1. At Tiverton Lower Moor Way, the cameras are monitored in the Server Room, plus the Sales office who attend to visitors. Lichfield cameras are monitored via the office monitor which has limited secure access, Bristol is managed and monitored in branch. Tiverton Mountbatten Way cameras are monitored in the main office. Please see Savills CCTV policy for Letchworth.

4.2. Images are recorded centrally on the app where applicable, dedicated site recording equipment and servers located securely and are viewable by authorised personnel only see appendix 1. Additional staff may be authorised by the director with guidance from the Data Protection Officer to monitor cameras sited within their own areas of responsibility on a view only basis.

4.3. The cameras installed provide images that are of suitable quality for the specified purposes for which they are installed, and all cameras are checked daily to ensure that the images remain fit for purpose and that the date and time stamp recorded on the images is accurate.

4.4. All images recorded by the CCTV System remain the property and copyright of dormakaba.

4.5. The monitoring of staff activities will be carried out in accordance with Part 3 of the Employment Practices Code 2.

4.6. The use of covert cameras will be restricted to rare occasions, when a series of criminal acts have taken place within a particular area that is not otherwise fitted with CCTV. A request for the use of covert cameras will clearly state the purpose and reasons for use and the authority of the Data Protection Officer will be sought before the installation of any covert cameras. The Data Protection Officer should be satisfied that all other physical methods of prevention have been exhausted prior to the use of covert recording.

4.7. Covert recording will only take place if informing the individual(s) concerned would seriously prejudice the reason for making the recording and where there are reasonable grounds to suspect that illegal or unauthorised activity is taking place. All such monitoring will be fully documented and will only take place for a limited and reasonable period.

5. Compliance with Data Protection Legislation

5.1 In its administration of its CCTV system, dormakaba complies with the General Data Protection Regulation (GDPR) and the Data Protection Act

2018. Due regard is given to the data protection principles embodied in GDPR.

These principles require that personal data shall be:

- processed lawfully, fairly and in a transparent manner.
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.
- accurate and, where necessary, kept up to date.
- kept in a format which permits identification of the data subjects for no longer than is necessary for the purposes for which the personal data is processed.
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures. dormakaba ensures it is responsible for, and able to demonstrate compliance with GDPR.

6. Applications for disclosure of images

Applications by individual data subjects

6.1. Requests by individual data subjects for images relating to themselves ("Subject Access Requests") should be submitted either by completing the Data Subject Access Request (DSAR) Form or in writing to the Data Protection Officer at gdpr.GB@dormakaba.com Where a data subject is unable or unwilling to submit a request directly, a Location Manager may submit the request on their behalf. Appropriate verification and authority checks may be carried out before the request is processed.

6.2. To locate the images on the dormakaba system, sufficient detail must be provided by the data subject to allow the relevant images to be located and the data subject to be identified.

6.3. Where dormakaba cannot comply with a Subject Access Request without revealing another individual's personal data (CCTV footage where pixelation is not possible), dormakaba shall refuse or limit disclosure under the UK GDPR exemptions and an alternative solution may be offered (such as providing stills or written confirmation of presence).

Access to and disclosure of images to third parties

6.4. Where dormakaba is unable to comply with a Subject Access Request without disclosing the personal data of another individual who is identified or identifiable from that information, it is not obliged to comply with the request unless satisfied that the individual has provided their express consent to the disclosure, or if it is reasonable, having regard to the circumstances, to comply without the consent of the individual.

6.5. A request for images made by a third party should be submitted either by completing the Data Subject Access Request (DSAR) Form or in writing to the Data Protection Officer at gdpr.GB@dormakaba.com

6.6. In limited circumstances it may be appropriate to disclose images to a third party, such as when a disclosure is required by law, in relation to the prevention or detection of crime or in other circumstances where an exemption applies under relevant legislation.

6.7. Such disclosures will be made at the discretion of the Data Protection Officer, with reference to relevant legislation and where necessary, following advice from the Group Data Protection Officer

6.8. Where a suspicion of misconduct arises and at the formal request of the Investigating Officer or HR Manager/Advisor, the Data Protection Officer may provide access to CCTV images for use in staff disciplinary cases.

6.9. The Data Protection Officer may provide access to CCTV images to Investigating Officers when sought as evidence in relation to staff discipline cases.

6.10. A record of all CCTV requests and disclosures made under this policy will be maintained within the SharePoint-based CCTV Request Register. The register will be managed by the GDPR Team and/or Data Protection Officer (DPO) and will record, as a minimum, the date, time, camera/location, requestor, authoriser, outcome, and reason for the request or disclosure.

7. Retention of Images

7.1 Unless required for evidential purposes, the investigation of an offence or as required by law, CCTV images will be retained from the date of recording and images are automatically overwritten after this point for the following periods:

- 2 months at the Tiverton Lower Moor Way & Bristol sites
- Please see Savills CCTV policy for Letchworth Spirella House
- 14 days at the Litchfield site
- 7-10 Days at the Tiverton MW Site

7.2 Where an image is required to be held more than the retention period referred to in 7.1, the Data Protection Officer, or their nominated deputy, will be responsible for authorising such a request.

7.3 Images held more than their retention period will be reviewed on a 2 monthly basis at the Tiverton & Bristol sites, and 12 months at the other sites listed above, and any not required for evidential purposes will be deleted. Please see Savills CCTV policy for Letchworth.

7.4 Access to retained CCTV images is restricted to the Data Protection Officer and other persons as required and as authorised by the Data Protection Officer.

8. Complaints Procedure

8.1 Complaints concerning dormakaba use of its CCTV system or the disclosure of CCTV images should be made in writing to the Data Protection Officer at gdpr.GB@dormakaba.com

9. Monitoring Compliance

9.1. All staff involved in the operation of dormakaba CCTV System will be made aware of this policy and will only be authorised to use the CCTV System in a way that is consistent with the purposes and procedures contained therein.

All staff with responsibility for accessing, recording, disclosing, or otherwise processing CCTV images will be required to undertake data protection training. Those staff with CCTV responsibilities and who have completed Data Protection training are listed below:

- Site Facilities Manager
- ESA Manager
- Operations Managers
- Branch Managers
- Production Managers
- Sales Team Leader

10. Policy Review

10.1. dormakaba usage of CCTV and the content of this policy shall be reviewed annually by the Data Protection Officer with reference to the relevant legislation or guidance in effect at the time. Further reviews will take place as required.

11. Appendix 1

Position in company
Branch manager
Area Manager
Production and Warehouse Manager
Office Manager
Business Manager
Technical Manager
Technical Support
Product Support
Logistics Operative
Branch Manager
Maintenance Engineer
Maintenance Engineer
UK Site Manager
IT Support

Updates to document

Review Date	Changes or Modifications	Approved by	Published
09/09/24	Bristol site added to policy	DPO	09/09/24
09/2026	Removed sites no longer operating CCTV (Ireland and Pensnett Estate/Midlands). Added Tiverton Mountbatten Way. Updated CCTV monitoring arrangements, retention periods and authorised personnel. Revised CCTV request and disclosure process to include DSAR Forms, Location Manager submissions and SharePoint-based request logging managed by the GDPR Team/DPO.	DPO	10/2026