



# CCTV Policy

## Proprietary Notice

Information contained in the document is accurate to the best of Node4’s knowledge at the time of publication and is required to be treated as confidential at all times.

Information presented herein may not be used, copied, disclosed, reproduced, or transferred to any other document by the recipient, in whole or in part, without the prior written authorisation from a Node4 authorised representative.

Version	Status	Date	Author	Reviewer	Changes
1.0	Approved	21/02/2023	Vicky Withey	Andy Gilbert	Approved version
1.1	Draft	09/08/2024	Eddie Adams	DPO	Annual review
1.2	Approved	12/03/2025	Eddie Adams	DPO	Rebrand

## Contents

Introduction .....	3
Purpose.....	3
Scope .....	3
Responsibilities .....	3
Access .....	4
Subject Access Request .....	4
Customer Requests .....	4
Retention .....	4
Training and Communication .....	4
Legal.....	4
Compliance.....	5

## Introduction

Node4 Limited uses closed circuit television (CCTV) images to provide a safe and secure environment for employees and for visitors to their business premises, and to protect Node4's property.

This policy sets out the use and management of the CCTV equipment and images in compliance with the Data Protection Act 2018 and the Information Commissioner's Office Code of Practice for Surveillance Cameras and Personal Information.

## Purpose

Use of CCTV systems include:

- Monitoring the security of Node4's business premises.
- Deter potential burglars and assist in the prevention or detection of crime or equivalent malpractice.
- Assure clients and interested parties that Node4 premises have an additional layer of security.

## Scope

This policy applies to all Node4 employees and all other persons acting on behalf of the company, visitors to Node4 premises and public within vicinity of the perimeter.

## Responsibilities

The Executive Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Compliance Team has responsibility for implementing this policy, monitoring its use and effectiveness, dealing with queries, auditing internal control systems and procedures.

Managers are responsible for ensuring those reporting to them understand and comply with this policy.

Employees and those working for Node4 must ensure that they have read and understood this policy.

Node4 will display appropriate signage within their buildings and on external gates and fences.

The Privacy Policy shall reflect that CCTV is used within Node4 buildings.

## Access

Data Centre Operations, Service Desk and reception teams monitor CCTV during working hours, and Security Guards outside of these times.

## Subject Access Request

The UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 provide Data Subjects with a variety of rights in relation to the Personal Data held about them by Node4.

CCTV recordings may be disclosed as part of our compliance with fulfilling a subject access request.

## Customer Requests

Any request to view CCTV footage should be requested via the service desk, detailing date, times, and subject.

Node4 will review the footage and confirm details to the customer, where appropriate Node4 will invite the customer to attend the site to view the redacted footage.

A copy of the footage can only be taken off site with a formal request from the Police.

## Retention

Node4 CCTV archive retention of 92 days for PCI attestation.

## Training and Communication

Training on handling CCTV images or recordings is undertaken with only those staff who will be involved in the operation and administration of the system.

This policy forms part of the induction process for all individuals who work for Node4, and regular training will be provided as necessary.

## Legal

Node4's legal basis for processing this personal data is a necessity to meet legal obligations and a legitimate interest for the protection of their premises.

Node4 may process special category personal data as there is a substantial public interest for the purposes of detecting and preventing crime.

Node4 will only share this data when it is necessary, or if required to do so by law. We do not plan to share it with anyone else or use it for anything else.

We may be asked to provide footage to assist the police with any criminal damage or their investigations. We may also be asked for footage from insurance companies should there be an incident involving car accidents or damage to parked cars.

However, there is no planned regular or scheduled sharing of CCTV footage with any external organisation.

## Compliance

The Compliance Team will perform random sampling checks and ad-hoc internal audits to ensure that this policy is being adhered to.