### PRIVACY

## Sky Revolutions Camera Systems Policy



# Camera systems operation policy

#### 1. INTRODUCTION

CCTV camera and timelapse camera systems are based around digital technology and the footage gained therefore needs to be treated as information that will be processed under the Data Protection Act 1998, the General Data Protection Regulation (GDPR) and any subsequent data protection legislation.

Sky Revolutions has due regard to the Data Protection Act 1998, the General Data Protection Regulation (GDPR) and any subsequent data protection legislation, and to the Freedom of Information Act 2000, the Protection of Freedoms Act 2012 and the Human Rights Act 1998.

Although we are not a relevant authority, Sky Revolutions will also have due regard to the Surveillance Camera Code of Practice, issued under the Protection of Freedoms Act 2012 and in particular the 12 guiding principles contained therein. Sky Revolutions has produced this policy in line with the Information Commissioner's CCTV Code of Practice.

Sky Revolutions uses fixed timelapse cameras at various construction sites around the United Kingdom. These camera systems comprise a camera and solar panel and are normally fixed on top of free-standing masts.

#### 2. PURPOSE OF OUR CAMERA SYSTEMS

Some of our timelapse cameras can be accessed via a private and secure portal for the purpose of site progress monitoring and to download timelapse film, video and still photographs from the cameras. Access to this portal is strictly controlled by Sky Revolutions Ltd. Our client organisations receive a controlled number of logins and the portal is password protected.

Some of our clients openly publish access to these cameras via their own websites. If you have any concerns about this, please get in touch with our team.

All our cameras are operated in a way that is consistent with an individual's right to privacy.

Filming from our camera systems is only carried out for a limited and reasonable period of time consistent with the objectives of making the recording in the first place – i.e.: for progress monitoring and marketing reasons. Normally, this means that once the build is complete, the cameras are removed. However, there are instances where our cameras will remain in place once the build is operational.

Our camera systems are not security systems. Any security related issues on the site on which our cameras are situated are the responsibility of our client organisation. This is normally the developer in charge of the site, or the owner or tenant of that site.

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Our cameras do not broadcast and do not record sound. We do not disclose the footage to anyone other that our client organisation – normally the developer of the site.

Sky Revolutions Ltd may also make use of footage and still images for our own marketing reasons.

#### 3. OPERATION

Our camera systems are installed, maintained and monitored by Sky Revolutions Ltd. We are responsible for the day to day running and operation of the systems and their compliance with this policy.

Our camera systems do not focus on individuals, surrounding homes, gardens or other areas of private property. However, wide angle cameras may inadvertently capture surrounding features, buildings and landscape. Due to the height at which our cameras are normally fixed, it is usual that these features are not distinct.

You are entitled however to request images and footage for review if you believe your private property has been captured by our camera systems.

Footage gained as a result of our camera recordings may be used by our client organisaitons for marketing purposes. Our client organisations normally own the copyright to all footage and still images recorded by our camera systems.

Warning signs, as required by the Code of Practice of the Information Commissioner have been placed on the masts that carry our camera systems or very close to where the cameras are operating.

#### 4. BREACHES OF THIS POLICY

Any suspected breach of this Policy by Sky Revolutions Ltd will be considered under our Disciplinary Policy and Procedures.

#### 5. OVERVIEW OF SYSTEM

Where active, our camera systems may run 24 hours a day, 7 days a week.

The camera system comprises:

- a. fixed position cameras;
- b. pan tilt and zoom cameras;
- c. monitors;
- d. multiplexers;
- e. digital recorders;
- f. public information signs.

Our cameras are located at strategic points on site, principally at points that capture the entire site.

Signs will be prominently placed at strategic points close to where our cameras are in operation.



#### 6. DATA PROTECTION ACT 1998

Camera digital images, if they show a recognisable person, are personal data and are covered by the General Data Protection Regulation (GDPR). This policy is associated with our GDPR Policy, the provisions of which should be adhered to at all times

#### 7. ACCESS TO IMAGES - INDIVIDUAL ACCESS RIGHTS

The General Data Protection Regulation gives individuals the right to access personal information about themselves, including CCTV and timelapse camera images. All requests for access to view/copy footage by individuals should be made in writing to Sky Revolutions Ltd.

Requests for access to images must include:

- a. The reason for the request
- b. The date and time the images were recorded
- c. Information to identify the individual or property
- d. The location of the camera
- e. Proof of Identity

Sky Revolutions will respond promptly and at the latest within 30 calendar days of receiving the request. If we cannot comply with the request, the reasons will be documented. The requester will be advised of these in writing, where possible.

#### 8. ACCESS TO IMAGES BY THIRD PARTIES

Unlike Data Subjects, third parties who wish to have a copy of camera images (i.e. images not of the person making the request) do not have a right of access to images under the GDPR, and care must be taken when complying with such requests to ensure that neither the GDPR, HRA or the CCTV Policy are breached.

#### 9. RETENTION AND DISPOSAL

Recorded images can be used in marketing materials and can be retained indefinitely. Where a successful request to remove private data has been received, all images on electronic storage will be permanently deleted or blurred depending on the nature of the request. All downloads, still photographs and hard copy prints will be securely disposed of as confidential waste. The date and method of destruction will be recorded on the bottom of the original approval to copy held by Sky Revolutions Ltd.

#### 10. DATA CAPTURE REVIEW OR REMOVAL REQUESTS

Data capture review or removal requests or complaints regarding the CCTV / camera system and itsoperation should be made directly to Sky Revolutions Ltd:

Sky Revolutions Ltd Unit 2, Espace North 181 Wisbech Riad, Littleport Cambs CB6 1RA

office@skyrevolutions.co.uk



Sky Revolutions (UK) Ltd 23 King Street Ind Est, Langtoft Peterborough PE6 9NF



Call: 01778 560929
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Email: hello@skyrevolutions.co.uk