



CCTV Privacy Policy

1. Introduction

Halsway Manor Society is committed to ensuring the safety and security of our guests, staff, and property. To support this commitment, a Closed-Circuit Television (CCTV) system is utilised throughout parts of our premises. This policy outlines how we use, manage, and protect CCTV footage in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

2. Purpose of CCTV

Our CCTV system is used for the following purposes:

- Ensuring the safety and security of guests, visitors, and staff
- Preventing and detecting crime, theft, and vandalism
- Monitoring the security of the premises
- Assisting in the investigation of incidents

CCTV is **not used** for monitoring staff performance or guest behaviour without legitimate cause.

3. Location of Cameras

Cameras are positioned in the following areas:

- Reception area
 - Car park and external areas
- Note:** CCTV is **not** installed in private areas such as guest rooms, bathrooms, or changing rooms.

4. Legal Basis for Processing

We process CCTV footage under the legal basis of **legitimate interests** (Article 6(1)(f) of the UK GDPR) to ensure the safety and security of the hotel and individuals on our premises.

5. Data Storage and Retention

- CCTV footage is recorded and stored securely.
- Footage is typically retained for a maximum of **30 days**, unless required for a specific investigation.

- After the retention period, footage is automatically deleted or overwritten, unless required for ongoing investigations or legal proceedings.

6. Access and Disclosure

Access to CCTV footage is restricted to authorised personnel only. We may share footage with:

- Law enforcement agencies (upon valid request)
- Insurance companies (in the event of an incident)
- Legal representatives (if necessary)

We do not disclose CCTV footage to third parties for marketing or non-security-related purposes.

7. Your Rights

Under data protection law, individuals have the right to:

- Request access to CCTV footage in which they are identifiable
- Object to processing where applicable
- Request correction or deletion of personal data in certain circumstances

To make a **Subject Access Request (SAR)**, please contact:

Chief Executive
Halsway Manor
Halsway Lane
Crowcombe
TA4 4BD
01984 618274 or chiefexec@halswaymanor.org.uk

We may request proof of identity to process your request and respond within one calendar month.

8. Security Measures

We implement appropriate technical and organisational measures to protect CCTV data, including:

- Restricted access controls by passwords
- Secure storage systems in locked offices
- Regular system maintenance and review

9. Policy Review

This policy will be reviewed annually or in the event of changes to legislation, technology, or our operations.