

Dated 2nd February 2024



THE MANAGEMENT OF CLIENT & SITE BASED RECORDS

SCOPE

This policy applies to any data or records recorded or produced during the course of a deployment to any given site. This might include Body Camera Footage or Daily Occurrence Log Books, but is otherwise and generally a bi-product of the work carried out on a site for which the Company is contracted. It is important that this policy is read alongside our Data Protection Policy [07-039] which provides additional clarity on the subject of data protection.

GENERAL STATEMENT

Elite Security Group inherently collects data during the routine course of business and such data may be retained for future reference or for some other defined purpose. For the purposes of this policy only, data collection is specific to information or data sourced from site-based employees, performing a security function on a Client site.

During the course of their deployment, an employee may make records and/or hold information and/or create data in accordance with the requirements of the site. This data may belong to the Company, but in many circumstances, would belong to (or be the property of) the Client or Managing Agent. This policy applies specifically for when the data being discussed is owned by the Client or Managing Agent.

In either case, data would be retained for the proper performance of agreed contractual obligations, as defined by Article 6 (1) (b) of the GDPR Regulations.

MANAGING REQUESTS FOR DATA

The Company recognises its responsibility to protect data ultimately owned by a Client and/or Managing Agent and will not disclose information or data which it reasonably believes to be the property of the Client and/or Managing Agent.

The Company will only disclose such information to a third party only on the express written request of the Client or Managing Agent or where some other Court Order is presented to the Company for its release.

Where a request is received by a third party for the release of data owned (or even potentially owned) by the Client or Managing Agent, such a request will be referred on as appropriate.

EXAMPLE OF DATA RETAINED

The following list, whilst limited, provides an overview to the types of data the Company looks to retain as part of normal business operations for and on behalf of a Client.. As previously identified, some of this information is required by law and/or some other justifiable reason. The Company is therefore keen to comply with GDPR whilst acknowledging its wider obligations where relevant.

Please note, this list is not exhaustive.

- 1) Body Camera Footage
- 2) CCTV Data (Site Based or Remotely Accessed and Stored)
- 3) Key Receipt Logs
- 4) Work Permit Records for Site Based Works
- 5) Access Control Records
- 6) Daily Occurrence Books
- 7) Site Specific Records

ICO REGISTRATION

Scott Huntley, Director of Support Services, is the nominated Data Controller and the Company is appropriately registered with the ICO. It is the intention of the Company to fully comply with best practice for the protection of data, whilst also employing reasonable and duly considered care and attention to the normal operations of the business.

DISCLOSURE OF DATA WITHOUT CONSENT

There are limited justifications for the disclosure of data without the consent of the subject to which the data pertains. For example, Article 6 (1) (c) provides such a justification whereby a disclosure is necessary for compliance of a legal obligation to which the Company is subject. There are other permissible justifications, but these are unlikely to affect or be applied our business in the short term.

SUMMARY

Elite Security Group fully complies with the obligations set out in the **General Data Protection Regulations (GDPR)** and maintains records to that effect. The Company recognises that some data held by the Company will actually be held for and on behalf of a Client and will protect that data accordingly.

Should you require further clarification as to the compliance of the organisation, please contact the Data Controller, Scott Huntley at our Head Office in Swindon.