

GOFFS CCTV POLICY

Version 1.0

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About this Policy

- 1.1 Goffs ("Goffs", "we", "us" and "our"), has in place a CCTV System which operates across our Premises.
- 1.2 We use CCTV cameras to view and record individuals on and around our Premises in order to maintain a safe environment for staff and visitors, and to protect livestock and our property. We recognise that the images of individuals recorded by CCTV cameras are Personal Data which must be processed in accordance with data protection legislation.
- 1.3 We are the Controller in relation to the CCTV Data processed by our CCTV System.
- 1.4 The purpose of this CCTV policy (this "Policy") is to:
 - (a) set out the accepted use of our CCTV System and the CCTV Data, as well as to outline why and how we will use CCTV, and how we will process Data recorded by CCTV cameras;
 - (b) ensure that the legal rights of our staff and visitors to our Premises, relating to their Personal Data, are recognised and respected;
 - (c) assist our staff in complying with their own legal obligations when working with Personal Data. In certain circumstances, misuse of information generated by CCTV or other surveillance systems could constitute a criminal offence; and
 - (d) explain how to make a subject access request in respect of Personal Data created by CCTV and the use of our CCTV System.
- 1.5 This Policy does not form part of any contract of employment or other contract to provide services, and we may amend it at any time.
- 1.6 A breach of this Policy may, in appropriate circumstances, be treated as a disciplinary matter. Following investigation, a breach of this Policy may be regarded as misconduct leading to disciplinary action, up to and including dismissal.

2. Who does this Policy apply to?

- 2.1 This Policy applies to all employees, officers, consultants, self-employed contractors, casual workers, agency workers, volunteers and interns. It also applies to anyone visiting our Premises.

3. Who is responsible for this Policy?

- 3.1 The HR Manager has overall responsibility for the effective operation of this Policy. Suggestions for changes to this Policy should be reported to hr@goffs.ie.
- 3.2 Any questions you may have about the day-to-day application of this Policy should be referred to the HR Manager hr@goffs.ie in the first instance.
- 3.3 We will review the ongoing use of the CCTV System and any other operational Surveillance Systems at each of our Premises at least every 12 months to ensure that their use remains necessary and appropriate, and that our CCTV System and any other Surveillance Systems in place are continuing to address the needs that justified their introduction.

4. Definitions

4.1 For the purposes of this Policy, the following terms have the following meanings:

CCTV: means a closed circuit television system comprised of fixed and domed cameras and pan-tilt-zoom cameras designed to capture and record images of individuals and property.

CCTV Data: means Data captured by the CCTV System.

CCTV System: means our CCTV system at the Premises.

Controller: means the person or organisation which determines the manner in which any Personal Data is processed. The Controller is responsible for establishing practices and policies to ensure compliance with the law. We are the Controller of all Personal Data used in our business for our own commercial purposes, including the images captured by our CCTV System.

Data: means information which is stored electronically, or in certain paper-based filing systems. In respect of CCTV, this generally means video images and any accompanying audio. It may also include static pictures such as printed screenshots.

Data Subjects: means all living individuals about whom we hold Personal Data as a result of the operation of our CCTV System (or other Surveillance Systems).

Data Users: means those of our employees whose work involves processing Personal Data. This will include those whose duties are to operate CCTV cameras and other surveillance systems to record, monitor, store, retrieve and delete images. Data Users must protect the Data they handle in accordance with this Policy and our [Data Protection Policy](#).

Personal Data: means information relating to a living individual who can be identified from that information (or other data in our possession). This will include video images (whether static or moving) of identifiable individuals and accompanying audio.

Premises: means each of our facilities located at:

- (i) Kill, County Kildare, Ireland
- (ii) Doncaster, England; and
- (iii) Hawick, Scotland

processing: means any activity which involves the use of Personal Data. It includes obtaining, recording or holding Personal Data, or carrying out any operation on the Personal Data including organising, amending, retrieving, using, disclosing or destroying it. Processing also includes transferring Personal Data to third parties.

Processor: means any person or organisation that is not a Data User (or other employee of a Controller) that processes Personal Data on a Controller's behalf and in accordance with the Controller's instructions (for example, a supplier that handles Personal Data on Goff's behalf).

Surveillance Systems: means any devices or systems designed to monitor or record images of individuals or information relating to individuals. For the purposes of this Policy, the term includes our CCTV System, as well as any other technologies that may be introduced in the future to capture information of identifiable individuals or information relating to identifiable individuals.

5. Reasons for the use of CCTV

5.1 We currently operate Surveillance Systems at and around our Premises as outlined below. We believe that such operation and use of Surveillance Systems is necessary for legitimate business purposes, including:

- (a) to prevent crime and protect buildings and assets, including livestock, from harm, including damage, disruption, vandalism and other crime;
- (b) to maintain the security of our Premises;
- (c) for the personal safety of staff, visitors and other members of the public and to act as a deterrent against crime;
- (d) to support law enforcement bodies in the prevention, detection and prosecution of crime;
- (e) to assist in day-to-day management of our Premises and business, including to provide oversight of our operational activities and to ensure the health and safety of our staff and others as well as that of our livestock;
- (f) to assist in the effective resolution of disputes which arise in the course of disciplinary or grievance proceedings;
- (g) to assist in the defence of any civil litigation, including employment tribunal proceedings;
- (h) to assist in the effective resolution of any disputes relating to our business operations including our auction sales and / or in the defence of any civil litigation arising from said activities; and
- (i) in the case of CCTV installed at our auction sites, to livestream our auction sales.

This list is not exhaustive and other purposes may be or become relevant.

5.2 We seek to operate our Surveillance Systems in a manner that is consistent with respect for an individual's privacy.

6. Monitoring and Recording

6.1 The CCTV System operates at and across our Premises.

6.2 CCTV cameras monitor all access points to and exit points from our Premises, as well as the exteriors of the buildings upon the Premises, the interiors of our auction houses, and our yards, horse-handling areas and viewing areas. CCTV cameras are also installed inside our office areas, including behind our reception desk, in our sales office and over the access and exit doorways leading to and from our office areas, as well as at the entry points to our server rooms and in other publicly accessible areas of the Premises, including our bars, cafés, restaurants and shop.

6.3 The CCTV System is operational, continuously recording and capable of being monitored for 24 hours a day, every day of the year. Images captured by our CCTV System are monitored by authorised personnel only. This may include monitoring by authorised third party contractors who are engaged to provide CCTV monitoring services. Where such a third party contractor is engaged, we will take all reasonable steps to ensure that such contractor maintains the security of our information, in accordance with industry standards, including that contractual safeguards are in place to protect the security and integrity of the CCTV Data and other Personal Data that the contractor may process. Live feeds from CCTV cameras will only be monitored where this is reasonably necessary, for example to protect health and safety and to monitor our auction sales activities.

- 6.4 Camera locations are chosen to minimise viewing of spaces not relevant to the legitimate purpose of the monitoring. As far as practically possible, CCTV cameras will not focus on private homes, gardens or other areas of private property.
- 6.5 Our CCTV cameras are not generally used to record sound; however, some cameras are set to record audio where this is necessary having regard to the legitimate purpose of the monitoring for which the specific camera is being used. This shall be limited to the CCTV cameras in our sales ring which are used to live stream and record our auctions.
- 6.6 Images are recorded and stored on a storage device located in a secure room. Live feeds can be viewed from within this secure room, however, access to the secure room is restricted to authorised personnel only. The output of some cameras will also be viewable on television screens located behind our reception desk, in our security huts and in our audio-visual control rooms, however, only authorised persons will have access to view the screens in said areas.
- 6.7 Authorised persons are also able to view live feeds of CCTV Data from a secure application. Access to the application is restricted and is protected by a strong password and multifactor authentication. Authority to access to CCTV Data through the application can only be granted by the Chief Technology Officer cto@goffs.ie.
- 6.8 Our CCTV cameras provide images that are of suitable quality for the specified purposes for which the cameras are installed and operated. We have arrangements in place to ensure that all CCTV cameras remain in good working order and fit for purpose.
- 6.9 All images recorded by the CCTV System remain the property and copyright of Goffs.

7. How we will operate any CCTV

- 7.1 We will ensure that suitable signage is displayed at areas such as entrances to the Premises and building sited upon the Premises, and at the entrance point to of surveillance zones to alert individuals to the presence of the Surveillance Systems and that their image may be recorded. The signage will contain details of the organisation operating the relevant Surveillance System, the purpose for using the Surveillance System and who to contact for further information, where these things are not obvious to those being monitored.
- 7.2 We will ensure that live feeds from CCTV cameras and recorded images are only viewed by approved members of staff whose role requires them to have access to such data. For the avoidance of doubt this may include HR staff involved with employment related matters such as disciplinary or grievance matters.
- 7.3 Recordings will only be viewed by authorised persons and recorded images will only be viewed in designated, secure locations.

8. Use of CCTV Data

- 8.1 In order to ensure that the rights of individuals recorded by the CCTV System are protected, we will ensure that Data gathered from CCTV cameras is stored in a way that maintains its integrity and security. This may include encrypting the Data, where it is possible to do so.

- 8.2 We may engage Processors to process CCTV Data, including Personal Data on our behalf. Where we do so, we will ensure reasonable contractual safeguards are in place with such Processors to protect the security and integrity of the CCTV Data.

9. Retention and erasure of CCTV Data

- 9.1 Data recorded by the CCTV System will be stored on secure servers. CCTV Data will not be retained indefinitely but will be permanently deleted once there is no reason to retain the recorded information. Unless required for evidential purposes, the investigation of an offence or as required by law, CCTV Data will be retained for no longer than 30 days from the date of recording. Images will be automatically overwritten after this point.
- 9.2 At the end of their useful life, all CCTV Data stored in whatever format will be erased permanently and securely. Any physical matter such as tapes or discs will be disposed of as confidential waste. Any still photographs and hard copy prints will be disposed of as confidential waste.
- 9.3 Where an image requires to be held in excess of the retention period (referred to in 9.1) the Group Chief Executive GroupChiefExecutive@goffs.ie, will be responsible for authorizing such extension to the retention period.
- 9.4 Any CCTV Data held for a period in excess of the retention period specified at clause 9.1 will be reviewed on a three-monthly basis and any part thereof not required to be further retained in accordance with clause 9.1 will be deleted.
- 9.5 Access to retained CCTV images is restricted to key IT and Security individuals and other persons as required and as authorized by the Group Chief Executive GroupChiefExecutive@goffs.ie.

10. Use of additional Surveillance Systems

- 10.1 Prior to introducing any new Surveillance System, including placing any new or repositioned CCTV camera in any workplace location, we will carefully consider if such action is appropriate by carrying out a data protection impact assessment (**DPIA**).
- 10.2 A DPIA is intended to assist us in deciding whether new or repositioned CCTV cameras or other Surveillance Systems are necessary and proportionate in the circumstances and whether they should be used at all or whether any limitations should be placed on their use.
- 10.3 Any DPIA will consider the nature of the concern that we are seeking to address by way of the proposed installation at that time, and whether the proposed CCTV camera and / or other Surveillance System is likely to be an effective solution, or whether a better solution exists. In particular, we will consider the effect any proposed CCTV camera and / or other Surveillance System will have on individuals and therefore whether its use is a proportionate response to the concern we are seeking to address.
- 10.4 No CCTV cameras will be placed in areas where there is an expectation of privacy (for example, in toilets or changing rooms) unless, in very exceptional circumstances, it is judged by us to be necessary to deal with very serious concerns.

11. Covert monitoring

- 11.1 We will never engage in covert monitoring or surveillance (that is, where individuals are unaware that the monitoring or surveillance is taking place) unless, in highly exceptional circumstances, there are reasonable grounds to suspect that criminal activity or extremely serious malpractice is taking place and, after suitable consideration, we reasonably believe there is no less intrusive way to tackle the issue.
- 11.2 In the unlikely event that covert monitoring is considered to be justified, it will only be carried out with the express authorisation of the the Group Chief Executive GroupChiefExecutive@goffs.ie. The decision to carry out covert monitoring will be fully documented and will set out how the decision to use covert means was reached and by whom. The risk of intrusion on innocent workers will always be a primary consideration in reaching any such decision.
- 11.3 Only limited numbers of people will be involved in any covert monitoring.
- 11.4 Covert monitoring will only be carried out for a limited and reasonable period of time consistent with the objectives of making the recording and will only relate to the specific suspected illegal or unauthorised activity.

12. Requests for disclosure

- 12.1 We may share CCTV Data with other group companies and other associated companies or organisations, for example shared services partners where we consider that this is reasonably necessary for any of the legitimate purposes set out above in paragraph 5.1.
- 12.2 In limited circumstances it may be appropriate to disclose CCTV Data 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.
- 12.3 Such disclosures (as are referred to at clause 12.2) will be made at the discretion of the Group Chief Executive GroupChiefExecutive@goffs.ie and only with their express permission. For the avoidance of doubt, CCTV Data will not normally be released to such third party unless satisfactory evidence that it is required for legal proceedings or under a court order has been produced.
- 12.4 In other appropriate circumstances, we may allow law enforcement agencies to view or remove CCTV Data where this is required in the detection, investigation or prosecution of crime.
- 12.5 Where a suspicion of staff misconduct arises, and at the formal request of the HR Manager hr@goffs.ie, may provide access to CCTV Data for use in staff disciplinary cases.
- 12.6 We will maintain a records of all disclosures of CCTV Data made under this Policy. Such record shall include details of the footage / image date and time (or time period), camera(s) involved, requestor, authorizer, date of request and reason for the disclosure.
- 12.7 We will never post CCTV Data online nor disclose same to the media.

13. Subject access requests

- 13.1 We recognise that, in some circumstances, Data Subjects may have a legal right to request erasure of their Personal Data or to restrict the processing of their Personal Data which may include CCTV Data.
- 13.2 Data Subjects may also make a request for disclosure of their Personal Data which may include CCTV Data (**Data Subject Access Request**).
- 13.3 Any data subject rights request (inclusive of a Data Subject Access Request) will be subject to the relevant statutory conditions from time to time in place and should be made in accordance with our Privacy Policy.
- 13.4 In order for us to locate relevant CCTV Data, any requests relating to CCTV Data must include the date and time of the recording, the location where the relevant footage was captured and, if necessary, information identifying the relevant individual.
- 13.5 With regard to Data Subject Access Requests, we reserve the right to obscure images of third parties when disclosing CCTV Data as part of a Data Subject Access Request, where we consider it necessary to do so. Moreover, where we are unable to comply with a Data Subject Access Request without disclosing the Personal Data of another individual who is identified or identifiable from the relevant CCTV Data and we are unable to obscure such other party's Personal Data, we will not be obliged to comply with the relevant Data Subject Access Request unless we satisfied that the other 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.

14. Complaints

- 14.1 Complaints concerning the use of the CCTV System or the disclosure of CCTV Data should be made in writing to the HR Manager hr@goffs.ie.
- 14.2 All appeals against the decision of the HR Manager in relation to the use of the CCTV System or the disclosure of CCTV Data should be made in writing to the Group Chief Executive, GroupChiefExecutive@goffs.ie.
- 14.3 In the case of our employees, where submission of a complaint in line with the terms of clause 14.1, employees should raise such concerns by way of our formal grievance procedure.

15. Monitoring Compliance

- 15.1 All staff involved in the operation of the CCTV System and / or any other Surveillance Systems 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 herein.
- 15.2 All staff with responsibility for accessing, monitoring, recording, disclosing or otherwise processing CCTV Data will be required to undertake data protection training.

16. Policy review

- 16.1 This Policy is reviewed annually by unless more frequent review is required.

