



DOUGLAS DICKSON  
PROPERTY MANAGEMENT LIMITED

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## Data Protection and Use of CCTV

This policy sets out how Douglas Dickson Property Management Ltd, as the managing agents of Broomhill Square Shopping Centre, process the data from the CCTV system.

### 1. Purpose Of The CCTV System

1.1 The Centre has installed the CCTV system to:

- Deter crime
- Increase personal safety and reduce the fear of crime
- Assist in the prevention and detection of crime
- Protect the Centre's buildings and property

The data processing is necessary for the purposes of these legitimate interests.

1.2 The system comprises of several cameras positioned around the external areas of the Centre. The images captured by the cameras are recorded continuously. The images can be viewed when there has been a specific event and in line with the guidance in paragraph 2.

1.3 Warning signs have been placed around the Centre where CCTV is operational.

### 2. Operation of the System

2.1 Employees of Douglas Dickson Property Management will view the images a few times a week to inspect the condition of the external areas of the Centre such as the cleanliness of the Centre and car park or to investigate reports of a crime.

2.2 Images captured by the system will be shared with Police Scotland or any other law enforcement agency when requested by a police officer. Any other requests for images should be refused, except in very limited circumstances where it may be appropriate to release images to a third party. In such cases the agreement of the Data Protection point of contact must be sought before this information is released.

2.3 Materials and images from the CCTV system will not be used for any commercial purpose or released to the media.

2.4 When images are provided to any external body, including the police, this will be done by downloading the information to our server and providing a copy of the images via USB memory stick or by sharing on a secure file sharing application.

2.5 Information stored on the system constitutes personal data as defined by the GDPR. An individual may ask to see images of themselves via a Subject Access Request.

2.6 There will be no disclosure of recorded data to third parties other than the authorised organisations such as the Police or insurance companies.

### 3 Retention

3.1 Images recorded by the system will not be kept any longer than is necessary and for a maximum of 1 month except in circumstances such as where a law enforcement body is investigating a crime or the footage is required for an insurance investigation. In such cases these images will be downloaded onto our secure server and retained for up to 12 months.

### 4. Data Protection Point of Contact

4.1 We have appointed a data protection point of contact who has an over-arching responsibility and oversight over compliance by us with data protection laws. Our data protection point of contact is Neil Livingstone, Douglas Dickson Property Management, 3 Fitzroy Place, Glasgow, G3 7RH, [info@douglasdickson.co.uk](mailto:info@douglasdickson.co.uk).

4.2 Our data protection point of contact will be responsible for:

4.2.1 Monitoring our compliance with data protection laws and this policy;

4.2.2 co-operating with and serving as our contact for discussions with the Information Commissioner's Office (ICO);

4.2.3 reporting breaches or suspected breaches to the ICO.