

## CCTV Policy

### 1 PURPOSE OF CCTV SYSTEM

1.1 We currently use closed circuit television ("**CCTV**") as outlined below. We believe that such use is necessary for legitimate business purposes, including:

1.1.1 to prevent, detect, deter and report on crime and protect buildings and assets from damage, disruption, vandalism and other crime;

1.1.2 public safety;

1.1.3 to assist with criminal investigations and support law enforcement bodies in the prevention, detection and prosecution of crime.

As we do not have a full-time receptionist in our Bristol Location (as defined below), a limited number of Michelmores staff monitor the live feed of the Bristol Location to identify when visitors arrive and generally for the legitimate interest of both us and our clients to provide the best client experience we can.

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

### 2 CCTV CAMERA LOCATIONS

2.1 CCTV cameras are installed by us at the following locations:

2.1.1 at the entry and exit points, and front and rear car parks, of our Woodwater House, Exeter office ("**Exeter Locations**"); and

2.1.2 in the Michelmores reception area on the first floor of our Broad Quay House, Bristol office ("**Bristol Location**").

2.2 Images are monitored by Michelmores for the purposes set out in section 1.

2.3 Signage is displayed at appropriate points to alert data subjects that CCTV cameras are in use at the Exeter Locations and Bristol Location and to refer to our Privacy Policy (<https://www.michelmores.com/privacy>) for further information about how we collect, keep and process data subjects' personal data.

2.4 The landlords of our other premises may operate their own CCTV systems that cover the public areas used by Michelmores and other business tenants of those buildings. These landlords' CCTV systems are not controlled by Michelmores.

### 3 RETENTION AND ERASURE OF IMAGES GATHERED BY CCTV

3.1 Images from the CCTV at the Exeter Locations are recorded on a computer server and/or digitally via a cloud operating system (the "**Recordings**"). The Recordings will be held in secure storage and generally for no longer than four months. Where Recordings may contain evidence of criminal activity or an accident, the relevant

Recordings may be kept longer in connection with the investigation and resolution of that incident. Where required by a law enforcement body to retain relevant Recordings, the Recordings will be kept by Michelmores or the relevant law enforcement agency for as long as the relevant party requires it.

- 3.2 Images from cameras at the Bristol Location are live images which are not recorded.
- 3.3 At the end of the retention period, all images 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.

#### **4 ACCESS AND DISCLOSURE**

- 4.1 Access to CCTV images from the Exeter Locations and Bristol Location is strictly controlled and limited to a small number of Michelmores' authorised personnel.
- 4.2 Under certain circumstances, individuals have rights under data protection laws in relation to their personal data. They may have the right to access, amend, delete their personal information or restrict the processing of their personal information. Such requests are subject to the statutory conditions from time to time in place and should be made in writing to Michelmores using the contact details in section 5 below.
- 4.3 No images from our CCTV cameras will be disclosed to any third party, without express permission being given by relevant Michelmores officers or employees. The use of images, including the provision of images to a third party, will be limited and always in accordance with data protections laws and our Privacy Policy (<https://www.michelmores.com/privacy>). Images will not normally be released unless satisfactory evidence that it is required for investigation of an alleged offence, to investigate an accidents, legal proceedings or under a court order has been produced.
- 4.4 In appropriate circumstances, we may allow law enforcement agencies to view or be provided with CCTV footage where this is required in the detection or prosecution of crime.
- 4.5 We will maintain a record of all disclosures of CCTV footage.
- 4.6 No images from CCTV will ever be posted online or disclosed to the media.

#### **5 CONTACT**

- 5.1 Questions, comments and requests regarding this CCTV policy are welcomed. Our full details are:

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Date: 1 November 2022