

CCTV Policy UK

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1 Document information

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CCTV Policy UK

2 Background and purpose

Sandvik Limited (Manor Way, Halesowen, B62 8QZ), trading as, Sandvik Construction Mobile Crushers and Screens (“Mobile C&S”) works to safeguard your personal integrity and ensure that you feel secure when we process your personal data. It is incumbent upon us to make sure that all processing of your personal data is conducted in accordance with applicable laws on the protection of personal data.

On site safety and security

Mobile C&S may process your personal data when recorded by limited facility camera surveillance (“CCTV”) by on-site cameras for the purpose of increasing the site safety and security. In case of any claims or litigations the CCTV footage can be used as evidence.

Internal Environment, Health & Safety training (“EHS training”)

In addition to the above purpose, Mobile C&S may also in specific situations process your personal data when using the recordings from the CCTV for EHS training in cases related to safety and security situations. This is to increase the knowledge of safety within the organisation.

3 Scope

This CCTV Policy UK (“Policy”) has been prepared in accordance with the UK General Data Protection Regulation (“UK GDPR”) and the Data Protection Act 2018 (“DPA 2018”) for compliance with the beforementioned regulations and ICO (Information Commissioners Office) guidance on camera surveillance systems. Interpretation and application of this policy shall be made in accordance with the UK GDPR.

4 Audience

This Policy applies to Mobile C&S employees and any other third parties visiting the Ballygawley site and Swadlincote office (together the “Mobile sites”).

5 Policy statement

Since camera surveillance is a processing of personal data that can result in a high risk to individuals, or under specific circumstances result in data related to criminal offences, this Policy states the necessary and relevant information around the conditions for the processing, the purpose and lawful ground, the categories of personal data, how long the data will be stored and where to reach out if any requests or complaints.

5.1 Lawfulness and transparency

Mobile C&S processes your personal data in accordance with the below:

- On site safety and security: increase site safety and prevent and detect crimes.
- Internal EHS training: maintain a safe and secure workplace for our employees.

The lawful ground of *legitimate interest* is applicable for both purposes above besides when the EHS training material results in that Mobile C&S processes personal data of third parties to Sandvik, then the processing will be based on *consent*.



5.1.1 Purpose and storage limitation

The purpose and processing of the personal data will be documented by Mobile C&S in accordance with art.30 in UK GDPR. In addition, a Data Protection Impact Assessments (“DPIA”) has been carried out due to the nature of the processing.

The UK GDPR and the DPA 2018 do not prescribe any specific minimum or maximum retention periods which apply to surveillance systems or the personal data that is being processed.

The personal data will only be stored for as long as necessary to fulfill the above purposes. In general, Mobile C&S will store the CCTV material for a period of 30 days except under specific circumstances like in the case of an accident or criminal activity. In these situations, the personal data will be stored for a longer period of time required by the circumstances. Regarding the internal EHS training, Mobile C&S will store the personal data for a period of 1 year.

5.1.2 Categories of personal data

The categories of personal data that Mobile C&S will process is video and camera footage of SRP employees and any other third parties visiting the Mobile C&S sites.

5.1.3 Transfer of personal data to a third country

Under this Policy Mobile C&S will transfer personal data internally to other Sandvik entities but not to any third parties in a third country.

6 Conditions for camera surveillance

Mobile C&S have cameras covering areas of the Mobile sites that are clearly identified through appropriate signs containing relevant information to the data subjects. The camera surveillance will only occur within Mobile C&S perimeters and limited public areas surrounding the factory. Video footage outside this area and private residence will be masked.

5.1 Access to the personal data

According to this Policy only specific Sandvik employees, with nominated access, will be able to access and process the personal data.

In addition, approved third party suppliers and contractors will be granted full access to the personal data for the purposes of installing and maintaining the surveillance system. These suppliers will be approved through the procurement process and the suppliers, and their employees will be subject to the correct contractor control and confidentiality through the supplier contract.

7 Information and data subjects’ rights

For more information or if you have questions about this Policy, Mobile C&S processing of personal data, you are welcome to contact data.privacy.mobiles@sandvik.com.

If you wish to exercise your rights as a data subject, you can reach out through the same information stated above or make a formal Data Subject Access Request (“DSAR”) via the official Sandvik webpage: [Personal data request \(home.sandvik\)](#).