

DATA PROTECTION POLICY

DPA & UK GDPR

Introduction

WCCTV Group Limited ('WCCTV', 'we', 'us', or 'the Group') is committed to protecting the rights and privacy of individuals, including staff and others, in accordance with the Data Protection Act (DPA) 2018 and the UK General Data Protection Regulation (UK GDPR).

This policy applies across WCCTV Group Limited and its UK subsidiaries (including dormant entities) and reflects our commitment to manage and use personal data transparently, fairly and lawfully.

We must ensure that our privacy notices are written in a clear, plain way that staff will understand.

WCCTV needs to process certain information about its staff and other individuals with whom it has a relationship for various purposes such as, but not limited to:

1. The recruitment and payment of staff.
2. The administration of programmes of study and courses.
3. External accreditation.
4. Complying with legal obligations to government including local government.

To comply with various legal obligations, including the obligations imposed on it by the UK GDPR, WCCTV must ensure that all this information about individuals is collected and used fairly, stored safely and securely, and not disclosed to any third party unlawfully.

Compliance

This policy applies to all staff. Any breach of this policy or of the data protection legislation may be treated as a disciplinary matter and dealt with under company's disciplinary procedures.

As a matter of best practice, other agencies and individuals working with WCCTV Group and who have access to personal information will be expected to read and comply with this policy. It is expected that departments who are responsible for dealing with external bodies will ensure that such bodies sign a contract including an agreement to abide by this policy.

UK General Data Protection Regulation (UK GDPR)

The UK GDPR regulates the processing of personal data and protects the rights and privacy of all living individuals. It gives individuals stronger rights to access, understand and control how their personal data is used. Personal data is information relating to an individual and may be in hard or soft copy (paper/manual files; electronic records; photographs; CCTV images) and may include facts or opinions about a person. Individuals can exercise the right to gain access to their information by means of a 'subject access request'.

Responsibilities under the UK GDPR

WCCTV Group is the 'data controller' under the terms of the legislation – this means it is ultimately responsible for controlling the use and processing of personal data. In certain circumstances, such as when providing services to customers (for example, managing CCTV systems on their behalf), WCCTV may act as a data processor, processing personal data only on the instructions of the customer as data controller.

The Chief Executive Officer retains overall accountability for data protection. The Senior Leadership Team has collective responsibility for overseeing compliance and ensuring appropriate measures are in place.

The Senior Leadership Team is also responsible for ensuring that the Company's registration with the Information Commissioner's Office (ICO) is accurate and kept up to date. Our data protection registration number is: ZA163619

Compliance with the legislation is the personal responsibility of all members of the Company who process personal information. Individuals who provide personal data to the Company are responsible for ensuring that the information is accurate and up to date.

Data Protection Principles

The UK GDPR requires that personal data be processed in accordance with the following seven principles:

1) Lawfulness, fairness and transparency

WCCTV will make all reasonable efforts to ensure that individuals who are the focus of the personal data (data subjects) are informed of the identity of the data controller, the purposes of the processing, any disclosures to third parties that are envisaged; given an indication of the period for which the data will be kept, and any other information which may be relevant.

2) Purpose limitation

WCCTV will ensure that data is only processed for the specific and lawful purpose for which it was collected, unless the individual is informed of and agrees to any additional processing.

3) Data minimisation

WCCTV will not collect more data than is necessary for the stated purpose. If irrelevant data is provided, it will be securely deleted immediately.

4) Accuracy

WCCTV will review and update all data on a regular basis. While individuals are responsible for providing accurate and up-to-date information, WCCTV will also take reasonable steps to ensure accuracy and will act promptly on any updates it receives.

5) Storage limitation

WCCTV undertakes not to retain personal data for longer than is necessary to ensure compliance with the legislation, and any other statutory requirements. This means WCCTV will undertake a regular review of the information held and implement a weeding process.

WCCTV will dispose of any personal data in a way that protects the rights and privacy of the individual concerned (e.g. secure electronic deletion, shredding and disposal of hard copy files as confidential waste). A log will be kept of the records destroyed.

6) Integrity and confidentiality (security)

WCCTV will apply appropriate technical and organisational measures to ensure the confidentiality, integrity and availability of personal data. In line with our information security policy (QF5001) and all supporting information security policies, WCCTV shall ensure it:

- Reduces the risk of information leakages by negligence or human error
- Reduces the risk of security issues from third parties
- Manages the costs associated with Information Security by implementing a structured Information Security Management System (ISMS)
- Reduces the likelihood of a Data breach that will affect our clients, customers, employees and other stakeholders.
- Ensures Confidentiality, Integrity and Availability of our services and Information held by WCCTV

7) Accountability

WCCTV accepts responsibility for complying with the UK GDPR and will be able to demonstrate compliance through policies, audits and records.

All members of staff are responsible for ensuring that any personal data which they hold is kept securely and not disclosed to any unauthorised third parties.

WCCTV will ensure that all personal data is accessible only to those who have a valid reason for using it.

Data Security

In line with our ISO 27001:2022 certification and information security policy, WCCTV ensures the following measures are applied:

- Confidentiality, Integrity and Availability of information and services.
- Encryption, password protection, restricted access, and secure disposal of personal data.
- Where applicable, hard copy personal data stored in lockable cabinets with key-controlled access.
- Personal data held electronically is password-protected and access restricted to authorised users.
- Redundant hardware securely wiped or destroyed before disposal, with logs maintained.
- Where necessary, PC screens positioned so they are not visible to unauthorised persons and protected by screensavers.
- Archived personal data is kept securely in controlled environments.
- Staff working off-site, e.g. when working from home must apply additional care to ensure personal data remains secure.
- Regular internal and external audits of our Information Security Management System (ISMS).

UK GDPR Individual Rights

1) The right to be informed

Individuals have the right to know how WCCTV collects and uses their personal data. WCCTV will provide clear, transparent privacy information including purposes of processing, retention periods, and who data may be shared with.

2) The right of access

Individuals can request access to their personal data (known as a subject access request). Requests may be made verbally or in writing and will be responded to within one calendar month.

3) The right to rectification

Individuals may have inaccurate or incomplete personal data corrected. Requests may be verbal or in writing, and WCCTV will respond within one calendar month, unless there are lawful grounds to refuse.

4) The right to erasure ('right to be forgotten')

Individuals can request deletion of their personal data in certain circumstances. Requests can be made verbally or in writing and will be responded to within one calendar month.

5) The right to restrict processing

Individuals have the right to obtain from the controller restriction of processing where one of the following applies:

- (a) the accuracy of the personal data is contested by the individual, for a period enabling the controller to verify the accuracy of the personal data.
- (b) the processing is unlawful, and the individual opposes the erasure of the personal data and requests the restriction of their use instead.
- (c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the individual for the establishment, exercise or defence of legal claims.
- (d) the individual has objected to processing their data pending the verification whether the legitimate grounds of the controller override those of the individual.

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

An individual who has obtained restriction of processing pursuant shall be informed by the controller before the restriction of processing is lifted.

6) The right to data portability

The right to data portability allows individuals to obtain and reuse their personal data for their own purposes across different services. It allows them to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without affecting its usability.

Doing this enables individuals to take advantage of applications and services that can use this data to find them a better deal or help them understand their spending habits.

The right only applies to information an individual has provided to a controller.

7) The right to object

UK GDPR gives individuals the right to object to the processing of their personal data in certain circumstances. Individuals have an absolute right to stop their data being used for direct marketing.

In other cases where the right to object applies you may be able to continue processing if you can show that you have a compelling reason for doing so. An individual can make an objection verbally or in writing. WCCTV will endeavour to respond to the request within 1 calendar month.

8) Rights related to automated decision-making and profiling

WCCTV does not use automated decision-making or profiling in its processing of personal data.

International Transfers

WCCTV will not transfer personal data outside the UK without ensuring an adequate level of protection in line with the UK GDPR. This may include adequacy decisions, Standard Contractual Clauses, or explicit consent. This ensures personal data has protections equivalent to those in the UK.

Consent as a Basis for Processing

Consent must be freely given, specific, informed and unambiguous. Silence, inactivity or pre-ticked boxes do not constitute consent. Consent is especially important when processing special category data. WCCTV will ensure that individuals are fully informed of intended processing before consent is obtained.

How we use your personal data

WCCTV processes personal data to meet its business, contractual, and legal obligations. This includes managing employees, fulfilling customer contracts, complying with statutory obligations, and protecting the security of our people, property, and systems. Personal information may also be used, where lawful and appropriate, for training, accreditation, and limited marketing purposes (with consent where required).

Further detail on how personal data is collected, used, shared, and retained is set out in WCCTV's external Privacy Notice.

Subject Access Requests (SARs)

Individuals have a right to access any personal data relating to them which is held by WCCTV. Requests may be made verbally or in writing and must be responded to within one calendar month.

CCTV

WCCTV operates CCTV systems within its premises for the purpose of protecting staff and property. Any personal data obtained by the CCTV system will be processed in compliance with the legislation.

Procedure for Review

This policy will be updated as necessary to reflect best practice or amendments to the UK GDPR or Data Protection Act 2018. Employees are encouraged to refer to the Information Commissioner's Office (ICO)

website (www.ico.org.uk) for further guidance, including the Guide to Data Protection and resources on individual rights.

Contact

If you have any questions about this policy or how WCCTV handles personal data, please contact:
humanresources@wcctv.com or sheq@wcctv.com



David Gilbertson – Chief Executive Officer

Date: 25 September 2025