

# CCTV Policy

## 1. Aim and Scope

This Policy sets out the use and management of the CCTV System in compliance with the relevant data protection and privacy laws including but not limited to the Data Protection Regulation (EU) 2016/679 (“GDPR”) and the Data Protection Act, Chapter 586 of the Laws of Malta and subsidiary legislation thereto, as may be amended from time to time.

The Policy aims to:

- i) define the purpose of processing of CCTV monitoring and recording; and
- ii) define the procedure for access, disclosure and use of such CCTV recordings and limit this to specified and justified purposes only.

Enemalta plc (the Company) is committed to ensure that the collection and use of such CCTV recording is fair and that it complies with the requirements of the relevant legislation.

This Policy applies to all of the Company’s CCTV System and the Automatic Number Plate Recognition System (ANPR), where applicable. The Company’s CCTV System may capture images and audio recordings. CCTV recordings are monitored and retained in strict accordance with this Policy.

## 2. Purpose of processing of data from CCTV

The use of CCTV is primarily for the following purposes:

- Deterring, prevention and detection of crime including misuse/abuse of equipment/ buildings.
- Identification, apprehension and prosecution of offenders.
- Aid in investigation of the incidents/injuries.
- Confirmation of alarms.
- Investigations by internal audit.
- Investigations and disciplinary action by HR.
- Protection of Enemalta facilities from intrusion.
- Ensure the safety of staff, clients, and visitors.
- Detect, prevent or reduce the incidence of crime.
- Anti-terrorism.
- Prevent and respond effectively to all forms of possible harassment and disorder.
- Reduce the fear of crime.
- Create a safer environment.
- Provide emergency services assistance.

The CCTV system operates 24 hours a day, 7 days a week.

### **3. Categories of Personal Data**

The information processed may include visual images, personal appearance and behaviours. This information may be about staff, guests, visitors, suppliers, business partners and clients, offenders and suspected offenders, members of the public and those inside, entering or in the immediate vicinity of the area under surveillance. Any monitoring of staff will be carried out in accordance with applicable legislation.

### **4. Processing of collected information**

Personal data collected in the course of the CCTV recording activities will be processed fairly and lawfully in accordance with the current Data Protection Act and the European General Data Protection Regulation.

The Company's legitimate interest for processing such personal data stems from the following: CCTV is used for maintaining public safety, the security of property and premises and for preventing and investigating crime and safety related incidents. The Company recognises the effect of such a CCTV System on the individual and the right to privacy and protection of personal data.

Equipment used, image quality, camera positioning and locations are appropriate to ensure that the images are adequate and exclusive for the purpose for which they are being collected.

Enemalta plc ensures that footage collected will be:

- Adequate, relevant and not excessive;
- Used for the purpose(s) stated in this Policy in Section 2 only and not used for any other purposes;
- Accessed and disclosed in line with Applicable Law and internal policies;
- Treated confidentially;
- Stored securely; and
- Not kept for longer than necessary for the legitimate business needs and will be securely destroyed once the issue(s) in question have been resolved.

### **5. Control of access to CCTV Footage**

All recording media used for the monitoring and capture of images on Enemalta's CCTV system belongs to and remains the property of Enemalta. It is important that access to and disclosure of images is restricted and carefully controlled, not only to ensure that the rights of individuals are preserved but also to ensure that the chain of evidence remains intact should the images be required for evidential purposes. Viewing of the footage is centered in defined areas and restricted to those who need to have access in accordance with this Policy and any governing legislation. All staff who have access to the CCTV System are made aware of the sensitivity of handling CCTV images and recordings.

To ensure CCTV camera images are not available to unauthorized employees/external personnel, preventive actions have *been* taken to ensure monitors are not visible from external areas.

## **6. Disclosure of CCTV Footage**

Disclosure of images from the CCTV system is controlled and is consistent with the purpose for which the system was established. The Company will share personal data with third parties only if there is a legal obligation imposed on it to do so.

Enemalta will be the Data Controller at the point of images/footage being recorded, however if any images are released to any other authorized organization/individual, the legal responsibility in relation to the images that have been released, will be transferred to that organization.

## **7. Storage and recording of CCTV recordings and security measures**

CCTV systems are configured to record continuously and will re-write over aged data on a rotational basis and will be retained exclusively for the period in which the Company may lawfully retain your personal data.

The Company shall implement and maintain appropriate and sufficient technical and organisational security measures, taking into account the nature, scope, context and purposes of the processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, to protect personal data against any unauthorised accidental or unlawful destruction or loss, damage, alteration, disclosure or access to personal data transmitted, stored or otherwise processed and shall be solely responsible to implement such measures.

The Company shall ensure that its staff who process personal data are aware of such technical and organisational security measures and shall ensure that such staff are bound by a duty to keep personal data confidential.

## **8. Data Controller**

Enemalta plc., a company registered under the laws of Malta with registration number C65836 and having its registered address at Enemalta plc., Central Administration Building, Church Wharf, Marsa, MRS 1000, Malta, is the data controller and responsible for any personal data collected, stored or processed under this Policy.

The Company has appointed a Data Protection Officer (“DPO”) who may be contacted via email on [dpo.em@enemalta.com.mt](mailto:dpo.em@enemalta.com.mt) or via telephone on +356 2298 0583.