

CCTV POLICY

1. Purpose of CCTV

Rudding Park operates CCTV across appropriate areas of the hotel, spa and golf resort to support the safety and security of guests, members, visitors, employees, contractors and other individuals, and to protect the resort's premises, facilities and property.

The purposes for which CCTV may be used include:

- protecting the safety and security of guests, members, visitors, employees and contractors
- preventing and detecting crime, including theft, burglary, fraud, criminal damage and unauthorised access
- protecting buildings, equipment, vehicles, grounds, golf facilities, spa facilities and other property
- assisting in the investigation of security incidents, accidents, damage, suspected criminal activity and complaints
- controlling and monitoring access to restricted or security-sensitive areas;
- supporting the safety and security of the car parks, entrances, reception areas, clubhouse and external grounds
- assisting emergency services or law-enforcement authorities where appropriate and lawful
- investigating incidents involving the safety of individuals or damage to resort property
- supporting the resort's wider security and risk-management arrangements

CCTV will not be used for purposes that are incompatible with these purposes unless an appropriate lawful basis and appropriate safeguards have been established.

2. Lawful Basis

The primary lawful basis for the processing of personal data through the Rudding Park CCTV system is:

Article 6(1)(f) UK GDPR – Legitimate Interests.

Rudding Park has a legitimate interest in protecting people and property, maintaining a safe and secure environment, preventing and detecting crime, managing security risks and investigating security incidents.

Rudding Park considers the use of CCTV to be a proportionate means of achieving these purposes in locations where there is a reasonable and demonstrable security or safety requirement.

Rudding Park does not generally rely on consent as the lawful basis for its routine CCTV operations because CCTV is operated for security and safety purposes and individuals would not ordinarily have a genuine choice as to whether they are recorded when entering or using relevant areas of the Resort.

3. Legitimate Interests Assessment

3.1 Purpose Test – Is there a legitimate interest?

Yes.

Rudding Park has legitimate interests in:

- protecting guests, members, visitors, employees and contractors from harm
- protecting Resort property and facilities
- preventing and detecting theft, criminal damage, unauthorised access and other criminal or inappropriate activity
- maintaining a safe environment across a large and publicly accessible hotel, spa and golf estate
- investigating incidents and complaints
- assisting with the identification and investigation of individuals involved in security incidents
- providing relevant information to law enforcement, emergency services, insurers or other appropriate third parties where there is a lawful basis to do so.

These interests are legitimate and are not dependent upon the Rudding Park obtaining a financial benefit.

3.2 Necessity Test – Is CCTV necessary?

Rudding Park considers CCTV necessary and proportionate in locations where there is a clear security, safety or operational justification.

Rudding Park is a multi-use premises comprising hotel accommodation, spa and leisure facilities, golf facilities, hospitality areas, car parks, entrances, external grounds and areas used by guests, members, staff, contractors and visitors.

Alternative measures such as physical security, access controls, lighting, locks, security staff, incident reporting and staff supervision are used where appropriate. However, these measures cannot always provide the same ability to deter, identify, investigate and respond to security incidents.

CCTV therefore provides an additional security measure which, when appropriately positioned and configured, assists the Resort in achieving its legitimate security and safety purposes.

Rudding Park will periodically review whether CCTV remains necessary in each monitored area and whether cameras can be removed, repositioned or otherwise adjusted to reduce the impact on individuals.

3.3 Balancing Test – Does the legitimate interest override individuals' rights?

Rudding Park recognises that CCTV involves the collection of personal data and that individuals have a reasonable expectation of privacy.

Rudding Park therefore seeks to minimise the impact of CCTV by:

- using cameras only where there is a documented security, safety or other legitimate purpose
- positioning cameras to capture only areas that need to be monitored
- avoiding unnecessary recording of neighbouring properties or areas outside the Rudding Park's control
- avoiding areas where individuals have a high expectation of privacy
- limiting access to CCTV footage to authorised personnel
- applying appropriate technical and organisational security measures
- retaining recordings only for as long as necessary for the relevant purpose
- providing appropriate CCTV signage and privacy information
- responding appropriately to data subject rights requests
- regularly reviewing the necessity and proportionality of the CCTV system.

Taking these safeguards into account, Rudding Park considers that its legitimate interests in protecting people and property and maintaining a safe and secure environment are not overridden by the privacy interests of individuals who are incidentally captured by CCTV in appropriate locations.

4. Hotel Areas

CCTV may be used in appropriate hotel areas including, where justified:

- external entrances and exits
- reception and lobby areas
- car parks and vehicle access points
- external approaches and grounds
- service entrances
- loading and delivery areas
- staff-only entrances
- corridors or other areas where there is a specific and documented security requirement
- other areas identified through security risk assessment

CCTV will not normally be used inside guest bedrooms or other areas where guests have a high expectation of privacy.

5. Spa and Leisure Areas

Rudding Park recognises that spa and leisure facilities can involve a particularly high expectation of privacy.

CCTV may be used in appropriate external or access-controlled areas such as:

- spa entrances and reception areas
- external approaches
- car parks
- corridors or access points where there is a genuine security requirement; and
- plant, service or restricted-access areas.

CCTV will not be used in areas such as:

- treatment rooms
- changing rooms

- toilets
- showers
- sauna or steam-room interiors
- or other areas where individuals would reasonably expect a high degree of privacy.

Any proposed CCTV in or near a sensitive area must be subject to a specific documented necessity and proportionality assessment before being introduced.

6. Golf Course and Clubhouse

CCTV may be used in appropriate areas of the golf operation, including:

- clubhouse entrances and exits
- clubhouse reception areas
- car parks
- external approaches
- equipment storage areas
- restricted-access areas
- golf facilities where there is a documented safety or security requirement
- other areas where CCTV is necessary to protect people, property or facilities.

Where cameras capture areas of the golf course, the Rudding Park will consider the purpose and field of view carefully to ensure that recording is proportionate and does not unnecessarily intrude into individuals' privacy.

7. Access to CCTV

Access to CCTV recordings will be restricted to authorised individuals who have a legitimate business or legal need to access the information.

CCTV footage may be disclosed where appropriate and lawful to, for example:

- the police or other law-enforcement authorities;
- emergency services;
- insurers or legal advisers where required for the investigation or handling of an incident or claim;
- professional advisers where there is an appropriate lawful basis; or
- individuals exercising their data protection rights, subject to applicable legal restrictions and the rights of other individuals appearing in the footage.

All disclosures will be considered on a case-by-case basis and recorded where appropriate.

8. Retention

CCTV recordings will be retained for the minimum period necessary to fulfil the relevant purpose, taking into account Rudding Park's security requirements and the possibility that an incident may not be identified immediately.

Where footage is required for the investigation of an incident, complaint, insurance matter, legal claim or potential criminal activity, the relevant footage may be retained for longer than the standard retention period where this is necessary and lawful.

The Resort will document its CCTV retention period and periodically review whether it remains appropriate.

9. Transparency

Rudding Park provides appropriate CCTV information through its privacy notice.

The information will explain

- that CCTV is in operation
- the identity of the organisation operating the system
- the purposes of the processing
- the applicable lawful basis
- how individuals can obtain further information
- relevant retention information
- how individuals can exercise their data protection rights

10. Review of the Legitimate Interests Assessment

This assessment will be reviewed periodically and whenever there is a material change to:

- the CCTV system
- the locations monitored
- the purposes for which CCTV is used
- the technology deployed
- the categories of individuals recorded
- relevant legislation or regulatory guidance; or
- the security risks faced by the Rudding Park.

Any significant expansion of CCTV or introduction of surveillance technology involving increased monitoring or a higher privacy risk will be subject to an appropriate data protection and proportionality assessment before implementation.