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CCTV Privacy Notice

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This privacy notice is provided by Tecknuovo Ltd (Company No. 9611416), which is the controller of the personal data described in this notice. If you have any questions about this notice or how we use your personal data, you can contact our Data Protection Officer at compliance@tecknuovo.com.

Purpose of this notice

At Tecknuovo, we are committed to ensuring the safety and security of our staff, visitors, and assets. This CCTV Privacy Notice outlines how we manage and use our closed-circuit television (CCTV) system at our office located on the 5th Floor, 6 St Andrew Street, London EC4A 3AE.

Our privacy notice takes account of all applicable legislation including but not limited to the general data protection regulations (GDP), Data Protection Act 2018 (as amended), ICO guidance and the Surveillance Camera Code of Practice, Human Rights Act 1998, and where relevant and, where relevant, the Regulation of Investigatory Powers Act 2000 (RIPA).

This CCTV privacy notice should be read alongside our main privacy notice, which explains how we process personal data more broadly across our business, including our website, recruitment processes, consultancy services and internal operations.

Purpose of CCTV

The CCTV system is in place to:

- Enhance the safety and security of staff and visitors.
- Support our health and safety measures.
- Prevent loss or damage to Tecknuovo property and assets.
- Prevent, detect, investigate, prosecute incidents of crime, theft, or vandalism.

Processing of Personal Information

Personal data of staff and visitors may be captured by our CCTV system. This includes images and, in limited circumstances, associated metadata such as date, time and location of recording. We process, store and share this information in accordance with UK data protection legislation and this notice.

Legal Basis for Processing

The processing of CCTV footage is based on our legitimate interests in maintaining a safe and secure environment for staff, visitors and assets, preventing and detecting crime, and supporting health and safety obligations. We have carried out a Legitimate Interests Assessment (LIA), which confirms that this processing is necessary and proportionate and does not override the rights and freedoms of individuals.

Operation and Monitoring

CCTV cameras operate 24/7 and are positioned at key access points on the 5th floor (positioned at the lifts, at each of the two exit points). The cameras are not fixed but are sited to ensure as far as is reasonable possible, they do not record areas not intended to be under surveillance. Cameras are equipped with audio recording capability, but audio is not recorded. Signage is clearly displayed in our reception area to inform individuals of CCTV usage on our floor. Footage may be monitored by our IT manager and the data protection officer ("Authorised Personnel"). The CCTV system is checked weekly by the IT Manager to ensure that it is operating effectively.

A Privacy Impact Assessment has been carried out prior to the installation of the CCTV system to ensure that the installation is compliant with legislation and ICO guidance. The Company will adopt a privacy by design approach if and when installing new cameras and systems, considering the purpose of each camera so as to avoid recording and storing excessive amounts of personal data.

Access and Disclosure

Footage may be accessed or disclosed only when necessary for the purposes outlined above or in response to lawful requests. All requests for disclosure of CCTV footage must be submitted via Authorised Personnel and viewing of live CCTV footage and/or recorded footage is restricted to such Authorised Personnel.

CCTV footage will be viewed in a secure area and any access to, and any disclosures of recorded footage will be recorded in the CCTV log. This process is overseen by the Chief Legal Officer. External disclosure of CCTV footage will not typically be permitted, other than to law enforcement agencies, to regulators, or to comply with a court order.

We may share CCTV footage, where lawful and necessary, with:

- law enforcement agencies or regulatory bodies;
- professional advisers (such as legal advisers) where required;
- building management or security providers who support the operation of the premises; and
- other third parties where required to establish, exercise or defend legal claims.

PUBLIC

All disclosures are limited to what is necessary and are recorded appropriately.

Storage and Retention

Any images recorded by the CCTV system will be retained only for as long as necessary for the purpose for which they were originally recorded. CCTV footage is retained for a maximum of 30 days and will be automatically deleted on a rolling basis, unless it is required for an investigation, legal proceedings, or to comply with a legal or regulatory obligation.

The Company will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. The measures in place include:

- CCTV recording systems only located in restricted access areas (IT server room);
- The CCTV system being encrypted/password protected;
- Restriction of the ability to make copies to specified members of staff.

A log of any access to the CCTV images, including time and dates of access and a record of the individual accessing the images, will be maintained by Tecknuovo.

International transfers and overseas access

CCTV footage is stored locally within the United Kingdom. We do not routinely transfer CCTV data outside the United Kingdom.

If this position changes (for example, if we introduce a cloud-based CCTV solution or remote support access from outside the UK), we will ensure that appropriate safeguards are in place in accordance with UK data protection law and will update this notice accordingly.

Covert Surveillance

The Company does not routinely engage in covert surveillance. However, in exceptional circumstances where there is a legitimate and proportionate reason to do so—such as where there is reasonable suspicion of criminal activity or serious misconduct—covert surveillance may be undertaken.

Any such surveillance will:

- Be authorised at the highest appropriate level of management (CEO and CLO).
- Be limited in scope, duration, and intrusiveness to what is strictly necessary to achieve the intended purpose.

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- Be preceded by a documented assessment of necessity and proportionality, including a Data Protection Impact Assessment (DPIA) where appropriate.
- Comply with all applicable legal requirements, including the Data Protection Act 2018, the Human Rights Act 1998, and, where relevant, the Regulation of Investigatory Powers Act 2000 (RIPA).
- Be conducted in a manner that minimises intrusion into the privacy of individuals not under investigation and only Authorised Personnel.

Where covert surveillance is planned or has taken place, appropriate records will be maintained, including any authorisation forms and justifications, in line with ICO guidance.

All staff who are involved in the management and operation of the CCTV system will be trained to support compliance with this notice and use of the system in accordance with data protection legislation.

Review of Policy and CCTV System

The CCTV system and the privacy impact assessment relating to it, will be reviewed annually during the Management Review.

Misuse of the CCTV System

The misuse of the CCTV system could constitute a criminal offence. Any member of staff who breaches this policy will be subject to disciplinary action.

Provision of personal data

Our use of CCTV is necessary for security, safety and operational purposes.

CCTV operates in specific areas of our premises, and appropriate signage is displayed to inform individuals of its use. By entering areas where CCTV is in operation, individuals acknowledge that monitoring may take place.

Individuals may choose not to enter areas covered by CCTV; however, this may limit access to our premises or certain facilities.

Your Rights

Under UK GDPR, individuals have rights in relation to their personal data, including the right to:

- request access to CCTV footage in which they appear (subject to verification and applicable restrictions);
- request rectification or erasure where appropriate;
- object to processing based on legitimate interests in certain circumstances; and
- lodge a complaint with the Information Commissioner's Office (ICO).

PUBLIC

Requests for CCTV footage

You have the right to request access to CCTV footage in which you appear. Requests must be made in writing and will be handled in accordance with our data subject rights procedures. We may need to verify your identity and obtain sufficient information to locate the relevant footage. Where CCTV footage contains images of other individuals, we may redact or restrict disclosure to protect the rights and freedoms of those individuals or refuse the request where an exemption applies. All requests will be assessed on a case-by-case basis in line with applicable data protection law.

Contact

For any queries or to exercise your rights, please contact our Data Protection Officer at compliance@tecknuovo.com. For any queries or complaints about the CCTV system please contact the Chief Legal Officer via email at compliance@tecknuovo.com or by correspondence to 5th Floor, 6 St Andrew Street, London EC4A 3AE