

	Question	Answer
1	What is the purpose of the processing operation	<ul style="list-style-type: none"> <li>• To protect our legitimate business interest of protecting ourselves against criminal activity</li> <li>• To provide evidence in disputes between employees or with guests, e.g., grievances or complaints</li> </ul>
2	Is the processing necessary to meet one or more specific organisational objectives	<ul style="list-style-type: none"> <li>• [To deter / prevent any criminal activity occurring on the premises, ensure the safety of our guests and protect our property]</li> </ul>
3	Is the processing necessary to meet one or more specific objectives of any Third Party?	<ul style="list-style-type: none"> <li>• Footage captured will not actively be shared with any third parties. It may, from time to time be shared with the authorities (Police) if required and, where requested</li> </ul>
4	Why is the processing activity important to the Controller?	<ul style="list-style-type: none"> <li>• As above, the operation of CCTV will act as a deterrent to criminal activity as well as help keep guests/employees safe and protect our property.</li> </ul>
5	If applicable, why is the processing activity important to Third Parties the data may be disclosed to?	<ul style="list-style-type: none"> <li>• Where the footage is shared in relation to a crime, it will be done so in the broader public interest</li> </ul>
6	Is there an alternative way to achieve the objective without conducting this processing activity?	<ul style="list-style-type: none"> <li>• There are currently no available alternatives that would offer the same or similar solution to the objective. The alternative is on-site security staffing, which is not an option from a cost perspective, and would be a risk for a lone worker. CCTV has proven to be an effective deterrent for criminal damage.</li> </ul>
7	Would the individual expect the processing activity to take place?	<ul style="list-style-type: none"> <li>• As many buildings, businesses and streets now operate with CCTV installed, it is arguable that the average individual might expect this processing to take place. However, it is feasible that some individuals (employees, guests or visitors) might not expect it to take place.</li> <li>• The necessary notices via signs will inform all individuals who may be affected by the processing, that it is taking place.</li> </ul>
7	Does the processing add value to a product or service that the individual uses?	<ul style="list-style-type: none"> <li>• Processing will help ensure the safety of our guests and protect our property</li> </ul>

9	Is the processing likely to negatively impact the individual's interests and/or rights?	<ul style="list-style-type: none"> <li>It is unlikely that individual's rights and interests will be directly negatively impacted by the processing, unless they do not wish to be recorded or are captured carrying out criminal activity, but this is considered proportionate.]</li> </ul>
10	Would the processing limit or undermine the rights of individuals?	<ul style="list-style-type: none"> <li>No</li> </ul>
11	Is the processing likely to result in unwarranted harm or distress to the individual?	<ul style="list-style-type: none"> <li>It is unlikely as individuals will be aware that CCTV is in operation</li> </ul>
12	Would unwarranted harm or distress to the individual occur if the processing did not take place?	<ul style="list-style-type: none"> <li>Due to the CCTV also being implemented as a deterrent for crime and for the safety of individuals who will be recorded, it is more likely that unwarranted harm would befall an individual if the processing did not take place.</li> </ul>
13	Are the interests of the individual aligned with the party looking to rely on their legitimate interests for the processing?	<ul style="list-style-type: none"> <li>It is in the interests of the organisation to provide a safe and secure environment for employees and guests.</li> </ul>
14	What is the connection between the individual and the organisation?	<ul style="list-style-type: none"> <li>The individuals whose data will be processed as a result of this activity will likely either be an employee or a guest</li> </ul>
15	What is the nature of the data to be processed? Does data of this nature have any special protections under GDPR?	<ul style="list-style-type: none"> <li>Images of individuals caught on CCTV may result in the collection of information which reveals an individual's health, race, or religion but such collection will be incidental and is not deliberately processed. CCTV footage will collect images of children and adults and anyone else at the premises.</li> <li>The data captured will be videos of employees/guests around the premises.</li> </ul>
16	Is there a two-way relationship in place between the organisation and the individual whose personal information is going to be processed? If so how close is that relationship?	<ul style="list-style-type: none"> <li>There is an ongoing relationship between employer/employee where individuals will be given fair notice of the CCTV being in operation.</li> <li>The relationship between us and our members is a contractual one, there are signs up and all the cctv information is found on the website</li> </ul>