

CCTV Surveillance Policy (AU & NZ)

1. Policy Statement

There are laws that regulate how Precision Group of Companies Pty Limited and its various group entities, which includes the other companies listed at <https://www.precision.com.au/precision-group-list-of-companies> (**Precision Group**) may collect, hold and use Personal Information, including in relation to the following shopping centres and commercial buildings owned by Precision Group in Australia and New Zealand:

- Adelaide Central Plaza, Port Adelaide Plaza and Customs House, SA;
- Chevron Renaissance (Surfers Paradise) and MacArthur Central & 144 Edward, Brisbane, QLD;
- Pran Central, Melbourne, VIC; and
- Shore City, Auckland, NZ,

(each a **Centre**).

These laws also give Individuals about whom each Centre holds Personal Information certain rights over that Personal Information.

This CCTV Policy provides guidance for good practice in the use of CCTV by each Centre including any service providers using or operating the CCTV in the Centre and on our behalf

2. Definitions

The following definitions are used in this CCTV Policy:

- **Body-worn Video** means in the case of certain security guards video cameras worn on their person and made obvious and observable by the way they are worn.
- **CCTV** means closed circuit television and similar surveillance equipment and includes Body-worn Video.
- **Surveillance Controller** means the designated Facilities Manager employed by Precision Group at the Centre with overall accountability for CCTV including responsibility for the implementation of this CCTV Policy on a day to day basis.
- **Authorised persons** means any manager, employee or contractor authorised by the Centre to deal with operational and usage matters regarding CCTV in accordance with this CCTV Policy.
- **Individual** means any individual who has his or her Personal Information collected, held and used by the Centre and/or Authorised persons.
- **Personal Information** means any information that allows an Individual to be identified. Images recorded using CCTV fall within this definition.
- **Surveillance Legislation** means
 - **in Australia:** the *Surveillance Devices Act 1999* (Vic), the *Surveillance Devices Act 2016* (SA), the *Invasion of Privacy Act 1971* (Qld) the *Privacy Act 1988* (Cth) and
 - **in New Zealand:** the *Private Security Personnel and Private Investigators Act 2010* and the *Privacy Act 2020*,

and includes any directions, regulations, codes of practice and principles under these Acts as well as any relevant criminal laws .

3. Purposes for which CCTV will be used by the Centre

CCTV is used by the Centre for the following purposes:

- (a) management of the Centre.
- (b) prevention, investigation and detection of crime;
- (c) apprehension and prosecution of offenders (including the use of images in criminal proceedings and litigation relative to or affecting the Centre).

- (d) public and employee safety.
- (e) monitoring the security of the Centre's premises;
- (f) protection of the Centre and Precision Group's assets.
- (g) analytical purposes such as visitor numbers, characteristics and demographics, and visitor behaviour in order to continuously improve the Centre.

4. Standards

The following standards apply to the use of CCTV by each Centre.

4.1 Operator Awareness

Authorised persons are required to be familiar with the purposes for which a CCTV surveillance scheme has been established and are made aware that CCTV is only to be used for the purposes set out in Section 3 of this CCTV Policy. Where it is not possible to physically restrict CCTV to avoid recording images from spaces not intended to be covered by a surveillance scheme, Authorised persons are trained to recognise the privacy implications of such spaces being covered. Appropriate training and other relevant information is provided to all Authorised persons.

4.2 Siting of equipment

CCTV is, where possible, to be sited to capture only images relevant to the purpose for which a surveillance scheme has been implemented and only monitor those spaces intended to be covered.

Consideration is also to be given to the physical conditions in which cameras are located, for example, infrared equipment may need to be installed in poorly lit areas.

The ability of cameras to be adjusted or manipulated to overlook property or public areas not intended to be covered by the CCTV surveillance scheme will be restricted where possible.

Where appropriate, the owners or residents of adjoining property should be consulted if the surveillance scheme records clear images of the adjoining property.

4.3 Notification and Signage of CCTV use

Clearly visible and legible signs will be placed at the Centre's sites where CCTV is operating to inform the public that they are entering a zone covered by CCTV. The size of signs will vary according to circumstances and signs should contain the following information:

- (a) the identity of the company responsible for the CCTV; and
- (b) contact details for the CCTV operator.

4.4 Body-worn Video – Notification and Use

In the event one or more security guard is equipped with Body-worn Video, it will be made clearly visible, will not be obscured under clothing, so that it is readily observable by members of the public.

Video footage captured by the Body-worn Video will be treated in the same way as CCTV footage under this CCTV Policy. It is recognised that in recording in this way, images and/or audio of persons not intended to be filmed may also be captured. The Centre will take all reasonable steps to exclude such audio and/or video from footage that is subsequently used.

4.5 Covert CCTV Surveillance Schemes

The Centre may, in exceptional circumstances, assess that the use of CCTV signage is not appropriate where the Centre has:

- (a) identified a specific criminal activity.
- (b) identified the need to use CCTV to obtain evidence of that criminal activity.

- (c) assessed whether the use of signs would prejudice success in obtaining such evidence.
- (d) assessed how long covert monitoring should take place to ensure that it is not carried out for longer than is necessary.
- (e) documented the information in points (a) to (d) above.

4.6 Quality of the Images

- (a) The images produced by CCTV should be as clear as possible so as to be effective for the purposes for which they are intended. Appropriate checks are undertaken on a regular basis to ensure that CCTV performs effectively.
- (b) Cameras are to be regularly maintained, serviced and protected to ensure that they capture acceptably clear images and remain in good working order. Damaged cameras are to be repaired promptly and all other system faults to be reported and rectified as soon as possible. Any recorded media must be of good quality.
- (c) Steps must be taken to ensure the accuracy of features recorded by the system, such as the location of the camera and/or date and time reference.

5. Retention of CCTV Data

The integrity of retained images is to be maintained to ensure their evidential value or to protect the rights of people recorded in them. Access to, and the security of the images is strictly controlled. Images retained for evidential purposes are to be held in a secure and controlled environment. Images are only to be removed or erased once the agreed retention period has expired.

Where images are removed for use in legal proceedings or for viewing, the Authorised persons will document this on a form, which is to be used and signed by all parties:

Only Authorised persons should view CCTV monitors displaying images from areas in which individuals would have an expectation of privacy. Access to recorded images is restricted to Authorised persons. Authorised persons with access to images are to be made aware of:

- (a) this CCTV Policy and the rights of individuals in relation to their recorded images.
- (b) the Centre's instructions for the use of CCTV on the Centre's premises.
- (c) other relevant codes of practice.
- (d) Precision Group's Privacy Policy.

6. Retention periods

The Surveillance Legislation does not prescribe any specific minimum or maximum retention periods which apply to all CCTV systems or footage. Rather, the Surveillance Legislation requires that records containing Personal Information be destroyed or permanently de-identified when no longer needed for any purpose for which the information may be used or disclosed under the Surveillance Legislation.

This means that a balance must be struck between retaining CCTV footage in accordance with applicable retention periods and destroying them when they are no longer required for any legitimate business purpose.

We should not keep images or video for longer than strictly necessary to meet our own purposes for recording them (this period has been generally treated as between 14 and 45 days).

On occasion, we may need to retain images for a longer period, for example, once a request has been made for access or where a law enforcement body is investigating a crime or incident, to afford them opportunity to view the images as part of an active investigation.

7. Access to and disclosure of images to “Third Parties”

Access to, and disclosure of, recorded images is restricted and carefully controlled to ensure that the rights of individuals in relation to their Personal Information are preserved in accordance with the Surveillance Legislation.

Those having access to CCTV footage must be made aware of the restrictions relating to access to, and disclosure of, recorded images. The reasons for disclosure of images must be compatible with the reasons or purposes for which the images were originally obtained.

A decision whether to allow requests for access by third parties in accordance with the Centre’s disclosure policy will be made by the Surveillance Controller or their representative. Disclosure of the recorded images to third parties can only be made in limited and prescribed circumstances.

Personal information contained within CCTV footage from Shore City in New Zealand not be disclosed to any overseas person or entity unless:

- (i) Precision Group believes on reasonable grounds that the recipient is subject to privacy laws that, overall, provide comparable safeguards to those in the *Privacy Act 2020* (NZ);
- (ii) the recipient is carrying on business in New Zealand and therefore subject to the *Privacy Act 2020* (NZ); or
- (iii) the individual(s) concerned authorise(s) the disclosure after being expressly informed by Precision Group that the recipient may not be required to protect the information in a way that, overall, provides comparable safeguards to those in the *Privacy Act 2020* (NZ).

All requests for access or for disclosure must be recorded. If access or disclosure is denied, then the reason is also documented. An **Application Form - Request to access CCTV** is attached to this CCTV Policy.

8. Access by Individuals

Individuals have a right of access to their Personal Information. All Authorised persons are to be trained to recognise a request for access to Personal Information by Individuals. All Individuals access requests are to be co-ordinated by the Surveillance Controller.

As above, all requests for access or for disclosure must be recorded. If access or disclosure is denied, then the reason is also documented. Individuals are to be provided with a standard **Application Form - Request to access CCTV** for completion in full by the Individual.

9. Monitoring Compliance with the Surveillance Legislation

The contact point indicated on the signage should be available to members of the public during office hours. The contact point should be aware of the policies and the procedures governing the use of CCTV. The following information is available on request:

- (a) Application Form - Request to access CCTV.
- (b) a copy of this CCTV Policy and Precision Group’s Privacy Policy.
- (c) complaints handling process to be followed should Individuals have concern about the use of the system.

A record of the number and the nature of complaints and other enquiries received will be maintained together with an outline of the action taken by Surveillance Controller who will collect these records and send them regularly to the Privacy Officer in order to assess the use of CCTV systems.

Each Surveillance Controller, together with Precision Group’s Privacy Officer, will regularly review the operation of this CCTV Policy and associated procedures to ensure compliance. An internal annual assessment will be undertaken to evaluate the effectiveness of each CCTV system. This will include an assessment of whether each CCTV scheme achieves its stated purpose, and, if not, whether the individual scheme should be modified or discontinued.

10. Further Information

Please contact the Surveillance Controller at Centre Management Office of the relevant Centre or Precision Group’s Privacy Officer at our Head Office in Sydney for further information or questions regarding this CCTV Policy.

Application Form - Request to access CCTV (AU & NZ)

BEFORE COMPLETING THIS FORM, PLEASE CHECK THE FOLLOWING REQUIREMENTS ARE MET:

In signing this application form, you acknowledge, agree and confirm:

- (a) that the information provided in this application is true and correct to the best of your knowledge;
- (b) if you are making the application on behalf of an organisation, that you are authorised to make this request on that organisation's behalf;
- (c) that any CCTV footage viewed by or released to you pursuant to this application is and remains the exclusive property of the Centre;
- (d) that you will exclusively use the CCTV footage viewed by or released to you for the purposes set out in this application and for no other purpose;
- (e) that you will not reproduce, copy, publish, display or otherwise release the CCTV footage, without the prior written consent of the Centre;
- (f) that you will keep any CCTV footage released to you pursuant to this application in a secure location and destroy it when it is no longer required;
- (g) that the Centre is subject to the *Privacy Act 1988 (Cth)* (AU) or *Privacy Act 2020 (NZ)* (**Act**) and that, to the extent applicable, any personal information contained in the CCTV footage viewed by or released to you pursuant to this application will be managed in accordance with that Act; and
- (h) that, to the extent permitted by law, the Centre excludes all liability for any loss or damage suffered or incurred by you in connection with or as a result of any use, reliance or decisions made using the CCTV footage viewed or released pursuant to this application.

APPLICANT DETAILS

2.	Name		
	Company (if applicable)		
	Address		
	Date of Request		
	Phone Number		
	Email		
	Position	<input type="checkbox"/> Tenant	<input type="checkbox"/> Other:
	ID verification	<input type="checkbox"/> Driver's license	<input type="checkbox"/> Other:

REQUEST DETAILS

3.	Reason for request			
	Type of request	<input type="checkbox"/> Viewing/playback (on premises)	<input type="checkbox"/> Copy – Image	<input type="checkbox"/> Copy - Video
	Area/Location of incident			
	Date of incident			
	Time of incident			

4.	Signature of Applicant:	Date:
