

CCTV Surveillance Policy (AU & NZ)

1. Policy Statement

The CCTV Surveillance Policy (**Policy**) is intended to meet the obligations of Precision Group of Companies Pty Limited and its related group entities, including the other companies listed at <https://www.precision.com.au/precision-group-list-of-companies> (**Precision Group**), in relation to CCTV surveillance, including notification of CCTV surveillance to customers, visitors and other members of the public under applicable State and Federal laws (**Surveillance Legislation**).

CCTV surveillance is used to monitor activities in retail and commercial areas and other designated areas for operational, security, protection, and safety purposes. Precision Group may collect, hold, and use Personal Information, in relation to the following shopping centres and commercial buildings owned by Precision Group in Australia and New Zealand:

- 100 Rundle Mall, Adelaide SA 5000 (Adelaide Central Plaza Shopping Centre);
- 200-220 Commercial Rd, Port Adelaide SA 5015 (Port Adelaide Plaza Shopping Centre);
- 220 Commercial Rd, Port Adelaide SA 5015 (Customs House Port Adelaide);
- 23 Ferny Avenue, Surfers Paradise, Gold Coast (Chevron Renaissance);
- 255 Queen St, Brisbane City QLD 4000 (MacArthur Central Shopping Centre);
- 144 Edward St, Brisbane, QLD 4000;
- 325 Chapel St, Prahran VIC 3181 (Pran Central Shopping Centre); and
- 52/56 Anzac Street, Takapuna, Auckland 0622, New Zealand (Shore City Shopping Centre)

(each a **Centre**, collectively, **Centres**).

This Policy is intended to give Individuals whose Personal Information may be held by a Centre guidance on how to access that information. The Policy also outlines our practices for the use of CCTV at each Centre, including by any service providers that use or operate CCTV at the Centre on Precision Group's behalf.

2. Definitions

The following definitions are used in this Policy:

- **Authorised Person** means any manager, employee or contractor authorised by the Centre to deal with operational and usage matters regarding CCTV in accordance with this Policy.
- **BWC** means body-worn cameras used by security guards 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 BWC.
- **Individual** means any individual who has his or her Personal Information collected, held and used by the Centre and/or an Authorised Person.
- **Personal Information** means information or an opinion about an identified Individual or an Individual that can be reasonably identifiable, whether true or not and whether recorded in material form or not.
- **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 Policy on a day to day basis.
- **Surveillance Legislation** means the following legislation and includes any directions, regulations, codes of practice and principles under these Acts as well as any relevant criminal laws:
 - In **Australia**:
 - *Privacy Act 1988* (Cth);
 - *Workplace Privacy Act 2011* (ACT);

- *Workplace Surveillance Act 2005* (NSW);
- *Surveillance Devices Act 2007* (NT);
- *Invasion of Privacy Act 1971* (Qld);
- *Listening Devices Act 1991* (Tas);
- *Surveillance Devices Act 1999* (Vic);
- *Surveillance Devices Act 1998* (WA); and
- *Surveillance Devices Act 2016* (SA).
- In **New Zealand**:
 - *Private Security Personnel and Private Investigators Act 2010*;
 - *Privacy Act 2020*; and
 - *Biometric Processing Privacy Code 2025*.

3. Scope

This Policy applies primarily to the use of CCTV and BWC at Centres in relation to customers, visitors and other members of the public.

This Policy applies to the following visual surveillance devices:

- (a) all CCTV cameras installed and operated at each Centre; and
- (b) all BWCs deployed by Precision Group security personnel.

Precision Group employees in Australia and New Zealand, temporary agency staff, subcontractors and contractors (**Workers**) may incidentally be captured by CCTV or BWCs at a Centre.

Surveillance relating to Workers in connection with the workplace, employment or engagement is governed by Precision Group's Workplace Surveillance Policy.

This Policy is to be read together with Precision Group's Privacy Policy, Privacy Collection Notice and Workplace Surveillance Policy. To the extent of any inconsistency, this Policy will prevail in relation to CCTV and BWCs at the Centres. The Privacy Policy prevails in relation to general privacy compliance, and the Workplace Surveillance Policy prevails in relation to workplace surveillance of Workers.

4. Purposes for CCTV surveillance

CCTV will be used by Precision Group in the Centre as follows:

- (a) to monitor activities at the Centre for operational, security, safety, and management purposes;
- (b) security and safety, including incident management and the investigation or reporting of suspected unlawful activity;
- (c) conducting ground transport activities and managing our parking facilities;
- (d) conducting, monitoring and analysing our business and internal operations, including for training purposes;
- (e) assist a member or officer of a law enforcement or regulatory agency with law enforcement activities;
- (f) protecting, enforcing or defending our legal rights and interests;
- (g) for analytical purposes, including assessing visitor numbers, characteristics and behaviours (such as visit frequency, preferred times or days of visit, whether visitors attend alone or in groups, browsing and purchasing patterns), to assist in improving the Centre; and
- (h) any other purpose notified to you and to which you have consented.

Cameras will be positioned so they are visible to people in the workplace and in retail or commercial premises operated by Precision Group. Camera surveillance will not be carried out in change rooms, toilets, showers or other bathing facilities.

Where Precision Group intends to introduce further surveillance, notification will be provided in writing in the relevant area or areas. Precision Group will erect visible signs at each entrance to the Premises informing individuals that camera surveillance is in operation.

The camera surveillance system will operate 24 hours a day, every day of the year. Surveillance will not be monitored live, but recordings may be reviewed if an incident is reported.

5. Notice to employees

All employees of Precision Group will receive a copy of this Policy via Employment Hero, our Human Resources Information System (HRIS) platform.

6. Standards

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

6.1 Operator Awareness

Authorised Persons must be familiar with the purposes for which CCTV surveillance has been established and must only use CCTV for the purposes set out in this Policy. They must be trained to recognise the privacy implications of the areas under surveillance. Appropriate training and relevant information must be provided to all Authorised Persons.

6.2 Siting of equipment

CCTV must be positioned to capture only images relevant to the purpose of the surveillance and to monitor only areas intended to be under surveillance. Consideration must be given to the conditions in which cameras are located, including:

- (a) whether infrared equipment is required in poorly lit areas;
- (b) whether cameras may overlook property or public areas not intended to be covered; or
- (c) where appropriate, whether the owners or residents of adjoining property should be consulted if the surveillance records clear images of that property.

6.3 Notification and Signage of CCTV use

Each Centre will display clearly visible and legible signage to inform the public that they are entering an area recorded by CCTV. The size of signs may vary, but they must contain the following information:

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

6.4 Body-worn camera – Notification and Use

If one or more security guards are equipped with a BWC, the device must be clearly visible and must not be obscured by clothing, so that it is readily observable by the public.

Video footage captured by a BWC will be treated in the same way as CCTV footage under this Policy. The audio recording functionality of a BWC must be disabled unless audio recording is expressly permitted under the applicable Surveillance Legislation for the relevant jurisdiction. Recordings, images and/or audio of Individuals not intended to be filmed may also be captured. The Centre will take all reasonable steps to exclude that audio and/or video from footage that is subsequently used.

6.5 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 an activity or incident that may be criminal in nature;
- (b) identified the need to use CCTV to obtain evidence of that activity;
- (c) assessed whether the use of signs would prejudice the success of obtaining that evidence;
- (d) assessed how long covert monitoring should take place to ensure that it is not carried out for longer than necessary; and
- (a) documented the information in paragraphs (a) to (d).

Any covert surveillance of Workers in the Centres will only be conducted in accordance with Precision Group's Workplace Surveillance Policy and the applicable State and Federal laws.

6.6 Quality of the Images

- (a) Images produced by CCTV should be as clear as possible so as to be effective for their intended purposes. Appropriate checks must be undertaken regularly to ensure that CCTV operates effectively.
- (b) Cameras must be regularly maintained, serviced and protected to ensure that they capture sufficiently clear images and remain in good working condition. Damaged cameras must be repaired promptly, and all other system faults must 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, including the location of the camera and the date and time reference.

7. CCTV data security

CCTV footage and images must be kept securely on each Centre's servers. Access to CCTV footage and images must be restricted to Authorised Person only, who require access for the purposes of this Policy. Images retained for evidential purposes must be held in a secure and controlled environment. Images may only be removed or erased once the applicable retention period has expired. Where images are removed for use in legal proceedings or for viewing, Authorised Persons must document the removal using an appropriate form signed by all parties.

Authorised Persons with access to CCTV footage and images must be made aware of:

- (a) this Policy;
- (b) the requirement to maintain a logbook recording access to footage;
- (c) the requirements for the encrypted transmission and storage of footage;
- (d) the requirement for regular audits of system security;
- (e) the requirement for the secure storage of retained CCTV footage, and periodic backups;
- (f) the Centre's instructions for the use of CCTV on the Centre's premises; and
- (g) Precision Group's Privacy Policy.

8. Retention periods

The Surveillance Legislation requires records containing Personal Information be destroyed or permanently de-identified when they are no longer required for the purposes for which the information was collected, used or disclosed.

Precision Group will ensure that retained CCTV footage is maintained only for the purposes permitted under the Surveillance Legislation and this Policy. Where CCTV footage is no longer required for those purposes, it will be destroyed or permanently de-identified.

Precision Group will retain CCTV footage for 14 days, or up to a maximum of 45 days where required for purposes permitted under the Surveillance Legislation and this Policy. A longer retention period may apply where necessary, including where a law enforcement body is investigating a crime or incident and requires access to the footage as part of an active investigation.

9. Access to and disclosure of CCTV footage

Precision Group restricts and carefully controls access to and disclosure of CCTV footage to ensure that the rights of Individuals in relation to their Personal Information are preserved in accordance with the Surveillance Legislation.

Precision Group may disclose CCTV footage to an authorised law enforcement agency for the purposes of investigating a crime or incident. Personal Information captured in CCTV footage will not be disclosed by an Authorised Person to a third party unless authorised or required by law.

If access to CCTV footage is requested by an Individual who has been captured by the CCTV system (or their authorised representative), any CCTV footage will be redacted (where practicable) with the original CCTV footage being retained by the Authorised Person. CCTV footage disclosed without redaction will be disclosed if required or authorised by law, including where requested by:

- (a) a court (for example by subpoena, notice of non-party disclosure or court order);
- (b) a government department requesting records under legislation;
- (c) insurers of Precision Group; or
- (d) a regulatory or governmental body.

Personal information contained in CCTV footage from the Centres may be disclosed to overseas recipients in Australia and New Zealand. Your personal information will only be disclosed to those overseas recipients where you have consented to that disclosure for use, storage and processing by those recipients. By providing that consent, you acknowledge and understand that:

- (a) your personal information may be disclosed to overseas recipients for purposes connected with our business operations;
- (b) Australian Privacy Principle 8.1 (**APP 8.1**) and New Zealand Information Privacy Principle 12 (**IPP 12**) will not apply to those disclosures;
- (c) countries outside of Australia or New Zealand may not have Surveillance Legislation that provides privacy protection obligations comparable to Australia or New Zealand in relation to personal information, and you may not be able to seek redress in an overseas jurisdiction; and
- (d) if an overseas recipient breaches the APPs or IPPs, as the case may be, the Surveillance Legislation may not bind that entity, and you may not be able to seek redress under the Surveillance Legislation.

If you do not want your personal information disclosed to overseas recipients, please let us know immediately.

All requests for access to, or disclosure of, CCTV footage must be recorded. Identification documents provided to verify an applicant's identity should be sighted only and must not be copied or retained. If access or disclosure of CCTV footage is denied, the reason must also be documented. An **Application Form - Request to access CCTV** is **attached** to this Policy.

10. Monitoring Compliance with the Surveillance Legislation

The contact point identified on the CCTV signage must be available to the public during office hours. The contact point must be familiar with the policies and the procedures governing the use of CCTV. The following information must be made available on request:

- (a) the Application Form - Request to access CCTV;
- (b) a copy of this Policy and other relevant policy documents, including Precision Group's Privacy Policy; and
- (c) details of the complaints handling process to be followed if an Individual(s) has concerns about the use of the CCTV system.

A record of the number and nature of complaints and other enquiries received must be maintained, with an outline of the action taken. The Surveillance Controller must collect these records and provide them regularly to the Privacy Officer for the purpose of assessing the use of CCTV systems.

Each Surveillance Controller, with Precision Group's Privacy Officer, must regularly review the operation of this Policy and associated procedures to ensure compliance. An internal annual assessment must be undertaken to evaluate the effectiveness of the CCTV system. This assessment must consider whether the CCTV system is achieving its stated purpose and, if not, whether the CCTV system should be modified or discontinued.

11. Breach of Policy

Precision Group will continually monitor compliance with this Policy and will in its absolute discretion, determine to investigate any suspected breach. Precision Group retains the discretion as to how it addresses and investigates any suspected breaches. If Precision Group finds that a breach has occurred, Workers may be subject to disciplinary action, up to and including the termination of the Workers' engagement or employment with Precision Group.

12. Further Information

For further information or to provide feedback on this Policy, please contact the Surveillance Controller at Centre Management Office of the relevant Centre or Precision Group's Privacy Officer or General Counsel.

13. Amendment or withdrawal of this Policy

This Policy will be reviewed on a regular basis to ensure that it remains relevant and appropriate to Precision Group. It is a continuing process.

For the avoidance of doubt, this Policy may be applied, reviewed, varied, replaced or withdrawn at any time at Precision Group's discretion and is not intended to form part of any employment contract or agreement Workers have with Precision Group.

14. Material Policy Revisions

Version	Effective Date	Details
1	June 2021	
2	October 2026	Review to capture changes in privacy laws and state surveillance laws

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) the information provided in this application is true and correct;
- (b) if you are making this application on behalf of an organisation, you are authorised to do so on behalf of that organisation;
- (c) any CCTV footage viewed or released to you pursuant to this application is, and remains, the exclusive property of Precision Group;
- (d) you will use any CCTV footage viewed or released to you pursuant to this application only for the purposes set out in this application and for no other purpose;
- (e) you will not reproduce, copy, publish, display or otherwise release the CCTV footage without Precision Group's prior written consent;
- (f) 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) Precision Group is subject to the *Privacy Act 1988* (Cth) and *Privacy Act 2020* (NZ) and, to the extent applicable, any Personal Information contained in the CCTV footage viewed or released to you pursuant to this application will be managed in accordance with those Acts; and
- (h) 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 of, reliance on, or decision made using CCTV footage viewed or released pursuant to this application.

APPLICANT DETAILS

1	Name			
	Company (if applicable)			
	Address			
	Date of Request			
	Phone Number			
	Email			
	Position	☐ Tenant	☐ Other:	
	ID verification	☐ Driver's licence	☐ Other:	

REQUEST DETAILS

2	Reason for request			
	Type of request	☐ Viewing/playback (on premises)	☐ Copy – Image	☐ Copy - Video
	Area/Location of incident			
	Date of incident			
	Time of incident			
3	Signature of Applicant:	Date:		
				