

PRIVACY POLICY SEPT 2022 GRAND HOTEL AKAROA

Purpose

The Grand Hotel aims to provide a safe and secure environment to protect its employees, customers and the interests of its shareholders. Closed Circuit Television (CCTV) Cameras are installed and operated for one or more of the following purposes:

- Facilitate employee and public safety.
- Improve security and deter criminal activity within or outside the premises.
- Protect the employer's fittings/fixtures and assets.
- In line with The Gambling act 2003 - Section 2 (16) Minimum Operating Standards 'The use and maintenance of security and surveillance facilities, including closed-circuit television systems' we are required to have CCTV on premise
- There is good quality, functioning and continuously monitored closed circuit TV (CCTV) coverage of the gambling area.
- Record receipt and banking transactions for playback if an error has occurred.
- Monitor compliance with cash handling techniques for cashier training purposes.
- Monitor trespass or unauthorised access to the premises.
- Monitor compliance with the employer's house rules, company policies and workplace procedures.
- Capture information that could be used to investigate crime, a health and safety matter, employee or customer incidents and/or misconduct.
- To assist in effectively managing the organisation, particularly in training employees on customer service and conflict management.
- The CCTV may also be used for ancillary purposes such as resource allocation and management.
- Under principle 6 of the Privacy Act, individuals have a right of access to information about themselves held by us. This includes CCTV footage.

Scope

This policy applies to all employees, contractors, customers and the general public who may be on or near the employer's premises. This policy applies to non-covert CCTV operating on or around the employer's premises.

Policy

1. The system may include, but is not limited to, a range of cameras
2. Cameras will be located at various places at the facilities, premises and areas, and may be relocated from time to time. CCTV may cover (but is not limited to):
 - 2.1. All Entrances & exits
 - 2.2. All cash handling areas
 - 2.3. all stock areas
 - 2.4. all gambling areas
3. CCTV cameras are currently located in the following places:
 - 3.1. All Entrances & exits

- 3.2. All cash handling areas
- 3.3. all stock areas
- 3.4. all gambling areas
- 4. Employees will be notified if any cameras are relocated during the course of their employment.
- 5. Cameras will record video only and kept for 30 days.
- 6. Signage advising of CCTV equipment will be installed at entry points to the premises.
- 7. Any employee incidents or misconduct detected by CCTV will be handled in accordance with the employer's house rules, company policies, workplace procedures, code of conduct, or employee's individual employment agreements.
- 8. Any criminal activity recorded on CCTV will be handled in accordance with the house rules, company policies, workplace procedures, code of conduct, employee's individual employment agreements and in accordance with the requirements of a criminal investigation.
- 9. The placement of any and all CCTV equipment will not unreasonably intrude on the privacy of individuals.
- 10. We may share information with
 - 1) a third party if we are required to do so under any laws or regulations, including to comply with our statutory obligations.
 - 2) a third party in the course of legal proceedings or other investigations. This may include sharing CCTV footage with the New Zealand Police or other public sector agencies where criminal activity is reported or suspected. These parties may also access live feeds from certain CCTV cameras from time to time, for law enforcement, investigation and emergency response purposes.
 - 3) a third party in the course of an investigation where the liability rests with us to provide satisfactory evidence
 - 4) any person you authorise us to disclose your personal information to
 - 5) any person, if that information is held in a public register, e.g. information held on property files or the rating information database
- 11. All cameras may operate 24/7 due to cash handling on site.
- 12. User access

Full System Access to all CCTV camera features and programming	Owner & General Manager
Full system access to all CCTV camera features and programming for maintenance purposes	Owner & General Manager
Majority system access for all CCTV cameras on their site including some programming ability, live view, playback and export	Owner & General Manager
Live view and playback (no export)	Shift Managers
Live View only	All Staff

12. CCTV footage storage

12.1. CCTV footage is stored on a secure hard drive or similar storage device.

12.2. Access to the server is restricted to the authorised persons listed in clause 11.

12.3. CCTV footage will be recorded on the hard drive for 30 days before being overwritten in a continuous recording cycle. Where an incident or suspected incident has been identified, and with the approval of the owner, the footage may be retained for a further period of time as needed.

13. CCTV information access and the Police

13.1. At the employer's sole discretion, a copy of footage may be given to the Police where any criminal activity is suspected or where requested in accordance with Police procedure.

14. CCTV information access by individuals

14.1. Recorded footage is confidential to the employer. All requests to view footage relating to individuals will be referred to the employer's Privacy Officer for consideration.

14.2. At the Privacy Officer's discretion, they may approve persons or entities that data may be disclosed to.

14.3. A request by the public to view footage that contains information relating to other individuals must be in writing and will be dealt with as either:

14.3.1. a matter to be referred to the Police or

14.3.2. where the footage requested for viewing only shows the individual who has made the request, the request will be dealt with in accordance to the Privacy Act 1993.

15. Complaints

15.1. Any complaints about CCTV is to be forwarded in writing to the accounts@grandhotelakaroa.co.nz

Effective Date

Policy in effect from: September 2022