

# CCTV Privacy Notice

**Last Updated:** 16 June 2026

## Introduction

This CCTV Privacy Notice explains how Lords Group Trading plc and its subsidiary operating companies ("Lords Group Trading", "we", "us" or "our") collect and use personal information through the operation of fixed CCTV systems at our premises.

This notice applies to colleagues, customers, contractors, visitors and members of the public who may be captured by our CCTV systems.

For the purposes of UK data protection legislation, the relevant Lords Group company operating the premises you visit will normally act as the data controller responsible for the CCTV system at that location. Further information about the companies within the Lords Group can be found in the Lords Group Trading Privacy Notice.

## Why We Use CCTV

We operate CCTV systems to support our legitimate business activities and to:

- help prevent and detect crime and anti-social behaviour;
- protect the health, safety and security of colleagues, customers, contractors and visitors;
- safeguard Company property, assets and stock;
- assist with the investigation of accidents, incidents and complaints;
- support internal investigations, including disciplinary, grievance and health and safety matters where appropriate;
- assist law enforcement agencies and insurers where lawful and necessary; and
- establish, exercise or defend legal claims.

CCTV systems are used only where we consider their use to be necessary and proportionate.

Further information about how the Company operates and manages its CCTV systems is contained within the Company's CCTV Policy. A copy is available on request from the Data Protection Officer.

## What Information We Collect

Our CCTV systems may capture:

- still and moving images of individuals;
- the date, time and location of recordings;
- vehicle registration numbers and vehicle movements; and
- other information visible within the camera's field of view.

Our fixed CCTV systems do not routinely record audio.

## Lawful Basis for Processing

We process CCTV footage on the basis of our legitimate interests under Article 6(1)(f) UK GDPR.

Our legitimate interests include protecting individuals, preventing and detecting crime, protecting Company assets and supporting the effective management of our business.

In certain circumstances, we may also process CCTV footage where necessary to comply with a legal obligation or in connection with legal proceedings.

### **Who We Share CCTV Footage With**

We will only share CCTV footage where it is lawful, necessary and proportionate to do so.

This may include sharing information with:

- police and other law enforcement agencies;
- insurers and insurance investigators;
- legal advisers;
- regulators and government authorities;
- courts and tribunals;
- external service providers supporting our CCTV systems; and
- other parties where disclosure is required or permitted by law.

Where third-party service providers process CCTV footage on our behalf, they are required to protect it and act only in accordance with our instructions.

### **International Transfers**

Where CCTV footage is processed by service providers located outside the United Kingdom, we will ensure that appropriate safeguards are in place in accordance with applicable data protection legislation.

### **How Long We Keep CCTV Footage**

CCTV footage is retained in accordance with the Company's Records Retention and Disposal Policy and Schedule. Operational recordings are generally retained for no longer than 30 days unless a longer retention period is required.

Where footage is relevant to an investigation, legal proceedings, insurance claim, law enforcement request or other legitimate business purpose, it may be retained for longer where necessary and proportionate. The reasons for any extended retention period will be documented.

Once footage is no longer required, it will be securely overwritten, deleted or otherwise disposed of.

### **Protecting CCTV Footage**

CCTV footage is stored securely and access is restricted to authorised individuals who require access for legitimate business purposes. Appropriate technical and organisational measures are implemented to protect recordings against unauthorised access, alteration or disclosure.

### **Your Rights**

Under data protection legislation, you have a number of rights in relation to your personal information, including the right to:

- request access to your personal information, including CCTV footage where you are identifiable;
- request restriction of processing in certain circumstances;
- object to processing where we rely on legitimate interests;
- lodge a complaint regarding how your personal information has been handled; and
- complain to the Information Commissioner's Office (ICO).

Requests for access to CCTV footage will be handled in accordance with our Subject Access Request procedure. We may require additional information to identify the relevant footage and protect the rights of other individuals.

If you wish to request access to CCTV footage containing your personal information, please contact the Data Protection Officer. You may be asked to provide sufficient information to help identify the relevant recording.

### **Data Protection Concerns and Complaints**

If you have concerns about how your personal data has been handled, you may contact the Data Protection Officer at [DPO@lordsgrouptrading.co.uk](mailto:DPO@lordsgrouptrading.co.uk) or submit a complaint using our online [Data Protection Complaint Submission Form](#).

We will investigate concerns fairly and in accordance with applicable data protection legislation.

If you remain dissatisfied with our response, you have the right to complain to the Information Commissioner's Office (ICO).

Information Commissioner's Office  
Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF  
Telephone: 0303 123 1113  
Website: [www.ico.org.uk/make-a-complaint](http://www.ico.org.uk/make-a-complaint)

### **Contact Us**

If you have any questions about this notice, wish to exercise your rights or would like further information about our use of CCTV, please contact:

**Data Protection Officer**  
Lords Group Trading plc  
12–15 Hanger Green, London, W5 3EL  
Email: [DPO@lordsgrouptrading.co.uk](mailto:DPO@lordsgrouptrading.co.uk)  
Telephone: 020 3892 3942

### **Changes to This Notice**

We may update this CCTV Privacy Notice from time to time to reflect changes in our CCTV systems, legal requirements or our business practices.

The latest version of this notice will always be available on our website.