



# CCTV Privacy Policy

## 1. Purpose of a CCTV System

---

We use CCTV Systems to record images to assist in the provision of a safe and secure environment for the benefit of those who work at and visit HSF's offices, and for the protection of our property. Monitoring of CCTV Systems helps us to:

- maintain public safety;
- maintain the security of our property;
- assist in the prevention of crime;
- reduce the fear of crime and offer reassurance to staff; and
- facilitate the apprehension and prosecution of offenders in relation to crime.

We consider the processing of personal data for these purposes to be in our legitimate interests so that we can have a safe workplace.

## 2. Access and Disclosure

---

### 2.1 Control of Access

Access to our CCTV Systems and any associated recorded images which contain personal information ("Recorded Materials") is strictly controlled and is limited to those who need to have access in accordance with this policy. Any such access will only be given with the approval of one of our Operations Directors and one of our HR Directors.

Disclosure of Recorded Materials will only be provided to third parties for the purposes outlined above and in compliance with applicable data privacy laws.

In order to meet the stated purposes it may be necessary for us to share Recorded Materials internally with our offices, branches and associated entities. These recipients may be located outside your country. For further information on the sharing of your data between our entities please see our Privacy Policy on our website.

### 2.2 Access purpose

Recorded Materials may only be viewed for the following purposes;

- the investigation of an alleged crime; or
- the investigation of a security incident.

Any authorised viewings shall be registered in a log.

Recorded Materials may be used by us after an incident to assist in the identification and detection of offenders or in the investigation of a security incident.

### 2.3 Disclosure to Police

The police should not require or be provided with access to any of our CCTV Systems except under the following circumstances;

- emergencies or investigation of serious incidents;
- identification of offenders; or
- at our request (in accordance with this policy).

Recorded Materials will be supplied to the police for crime incidents on receipt of a formal request.



Any requests by police to remove CCTV recordings will be notified to our General Counsel & Risk team and will only be met where the request complies with applicable data privacy laws. Any such requests will also be registered in a log.

#### 2.4 Access by you

The privacy laws of some jurisdictions give individuals the right to access, amend or delete their personal information or, in some circumstances, to restrict the processing of their personal information.

If you would like to request a copy of your data or would like to change or erase all or any part of the information we hold about you, please contact us as set out below.

### 3. CCTV Camera Locations

---

CCTV cameras are located at strategic points throughout our offices so as to provide coverage of entry and exit points to our office areas. Where required by privacy laws, signage is displayed at appropriate points to alert employees and visitors that CCTV surveillance is in use and to provide our contact details for further information.

### 4. Security Measures

---

4.1 Any Recorded Materials shall be held securely and shall not be placed in areas accessible by our employees (other than those with requisite access rights), the public or be otherwise distributed.

4.2 We will take all reasonable precautions necessary to protect Recorded Materials from:

- (a) misuse, interference and loss; and
- (b) unauthorised access, modification or disclosure.

### 5. Storage of CCTV footage

---

CCTV images and Recorded Materials shall not be retained for any longer than is required for the stated purpose. Ordinarily footage is only retained for as long as is necessary to fulfil the stated purpose. Recorded Materials will be deleted securely and promptly once the stated purpose has been fulfilled.

### 6. Covert CCTV

---

Covert CCTV will not be used by Herbert Smith Freehills other than in exceptional circumstances. Any such use requires the authorisation of our General Counsel and will be given for a limited time and purpose only. Any decision to use covert surveillance must be registered in a log.

### 7. Contact and further information

---

If you have any questions about this CCTV Policy, or want to submit a written complaint about how we handle your personal information, please contact us via [privacy@hsf.com](mailto:privacy@hsf.com) or you may submit a complaint to the relevant supervisory authority in your jurisdiction.

**Date: 23 May 2018**