

CCTV Policy



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1. Introduction

This policy outlines the purpose, principles, and procedures for using CCTV systems within our private hire vehicles licensed by Bury Metropolitan Borough Council. The policy is designed to comply with the UK General Data Protection Regulation (GDPR), the Data Protection Act 2018, and all conditions imposed by Bury Council.

2. Purpose of CCTV

The use of CCTV in our vehicles serves the following specific and legitimate purposes:

- To ensure the safety and security of drivers and passengers.
- To prevent, investigate, and deter crime, including theft and anti-social behaviour.
- To assist law enforcement agencies, including Greater Manchester Police and Bury Council, in the investigation of incidents or complaints.
- To resolve disputes or complaints involving passengers or drivers.
- To assist in resolving insurance claims related to vehicle accidents.

3. Lawful Basis for Processing Personal Data

We process personal data, including CCTV footage, under the lawful basis of "legitimate interests," specifically for crime prevention, public and staff safety, and dispute resolution.

4. Bury Council Licensing Requirements

As a private hire operator licensed by Bury Council, we are aware of and will adhere to all relevant local authority conditions regarding in-vehicle CCTV.

- We will only install council-approved CCTV systems that meet technical and quality standards, including adequate storage capacity and tamper-proof security.
- All installations and maintenance will be carried out by suitably qualified persons.
- We will notify Bury Council's Licensing team of all vehicles fitted with CCTV.
- Upon request, we will make footage available to authorised officers of Bury Council and Greater Manchester Police.

5. Data Controller

As the operator installing and controlling the CCTV system, we are the 'data controller' for the personal data captured. We are therefore responsible for compliance with data protection laws and must register with the [Information Commissioner's Office \(ICO\)](#).

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6. Transparency and Signage

To ensure transparency, we will inform all drivers and passengers that CCTV is in operation.

- Prominent and clearly visible signage will be displayed on the exterior and interior of all vehicles with CCTV installed.
- The signs will state that CCTV is in use, the purpose of the monitoring, and the company's contact details.
- Drivers are required to verbally notify visually impaired passengers of the CCTV system.

7. Data Minimisation

We are committed to the principle of data minimisation and will take the following measures:

- Cameras will be positioned to record only the vehicle's interior and, where necessary, the immediate external vicinity, avoiding recording public spaces beyond what is necessary.
- Camera systems will be configured to avoid continuous audio recording, which is highly intrusive.
- Audio recording will only be activated manually by the driver using a panic button in specific circumstances, such as when there is a risk to safety or a dispute over payment. The signage will explicitly mention that audio recording may occur.

8. Data Security and Access

- CCTV footage will be digitally encrypted and stored securely within the vehicle's recording unit, which will be kept out of sight and away from passenger and driver access.
- Access to the recorded footage is strictly controlled and limited to authorised personnel only.
- All access to footage will be logged, including the time, date, person accessing, and the reason.

9. Retention of Footage

- Footage will be retained only for as long as necessary to fulfil the purposes outlined in this policy.
- Generally, footage will be automatically overwritten after a period of no more than 30 days unless it is needed for an investigation.

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- In the event of an incident, relevant footage will be extracted, stored securely, and retained as necessary for legal or investigatory purposes.



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10. Subject Access Requests (SARs)

Individuals have the right to request access to their personal data, including CCTV footage of themselves.

- All Subject Access Requests must be made in writing to the company's designated Data Protection Officer.
- We will respond to all valid SARs within one calendar month.
- If a request is complex, the response period can be extended by a further two months.
- When providing footage, the personal data of any third parties will be appropriately redacted or obscured.

11. Disclosing Footage

Footage will only be disclosed in the following circumstances:

- To the police or other law enforcement agencies for the prevention or detection of crime.
- To Bury Council's Licensing team for official regulatory purposes.
- To insurance companies to resolve claims related to an incident.
- Following a valid Subject Access Request.

12. Data Breaches

In the event of a data breach involving CCTV footage, we will report it to the ICO within 72 hours, as required by law, and inform affected individuals if there is a high risk to their rights and freedoms.

13. Review of Policy

This policy will be reviewed annually to ensure it remains compliant with UK GDPR, ICO guidance, and any relevant legislation or licensing conditions from Bury Council.