

INTRODUCTION

Optiven Limited “the Company” has installed a Closed Circuit Television system “the CCTV system” across its offices. This policy details the purpose, use and management of the CCTV system at the Company and procedures to be followed to ensure that the Company complies with the Data Protection Act, 2019 and any relevant laws. For more information on your privacy rights associated with the CCTV processing please refer to the Company privacy notice and privacy policy.

1. Purposes of CCTV

The Company is registered with the Office of the Data Protection Commissioner as a Data Controller and the registration number is 889-862C-2B49. The CCTV system installation has been subjected to a Data Protection Impact Assessment and the purposes for its operation are:

- i) For the prevention, reduction, detection and investigation of crime and other incidents;
- ii) To ensure the safety of staff and visitors; and
- iii) To assist in the investigation of suspected breaches of the company’s regulations by staff or visitors
- iv) Promoting productivity and efficiency.

2. Location of cameras

The CCTV system operates only across the Company’s office premises with the exception of the restrooms.

Signs are placed at all areas of the office to inform staff and visitors that CCTV surveillance is in operation.

3. Recording and storage

The footage captured by the CCTV equipment is clear for it to be achieve the purposes set out above. Maintenance checks of the equipment are undertaken by the ICT Department on a regular basis to ensure they are working well.

The equipment does not:

- capture audio recordings.
- have auto facial recognition.

The footage is recorded real-time (24 hours a day throughout the year) and has timestamps.

The footage is retained locally and is retained for no longer than 30 days from the date of recording. Footage will be automatically overwritten after this point.

4. Access and Disclosure

The footage is recorded centrally and held in a secure location. Access to the footage is restricted to three administrators in the ICT Department. Staff can access the footage from the ICT Department only upon acquiring authorization from the Human Resource Department. Viewing of recorded footage will take place in a restricted area to which other employees will not have access when viewing is occurring.

Disclosure to other third parties will only be made in accordance with the purposes for which the system is used and will be limited to:

- The police and other law enforcement agencies, where the footage recorded could assist in the prevention or detection of a crime or the identification and prosecution of an offender or the identification of a victim or witness.
- Prosecution agencies, such as the Office of the Director of Public Prosecutions.
- Human Resource managers involved with Company disciplinary and performance management processes.

All requests for access and disclosure to the footage will be documented, including the date of the disclosure, to whom the footage was provided and the reasons why they are required. If disclosure is denied, the reason will be recorded.

5. Monitoring Compliance

All staff involved in the operation of the CCTV System will be made aware of this policy and will only be authorized to use the CCTV System in a way that is consistent with the purposes and procedures contained therein.

All staff with responsibility for accessing, recording, disclosing or otherwise processing CCTV images will be required to undertake data protection training.

6. Inquiries and Complaints procedure

Inquiries and complaints concerning the Company's use of its CCTV system should be made in writing to the Data Protection Officer dpo@optiven.co.ke.

7. Policy review

The Company's usage of CCTV and the content of this policy shall be reviewed annually by the Data Protection Officer.