

UNIVERSAL AVIATION (UK) LIMITED
(“UNIVERSAL AVIATION”)
VIDEO SURVEILLANCE (CCTV) PRIVACY NOTICE

1. Introduction

- 1.1 This Video Surveillance (CCTV) Privacy Notice ("**Notice**") explains how Universal Aviation (UK) Limited ("**Universal Aviation**", "**we**", "**us**", "**our**") collect, share and use any information that, alone or in combination with other information, relates to you ("**Personal Data**") in your capacity as an employee, contractor, traveller or visitor ("you" and "your") to Universal Aviation's premises. For the purposes of this Notice, in using CCTV, the Personal Data we process about you relates to your recorded image.
- 1.2 Universal Aviation, as a data controller is responsible for ensuring that the processing of Personal Data complies with applicable data protection law, specifically with the General Data Protection Regulation and Data Protection Act, 2018.
- 1.3 This Notice also sets out the rights that you have in relation to the Personal Data that we process about you and how you can exercise them.
- 1.4 Universal Aviation treats compliance with its privacy obligations seriously. This is why we have developed this Notice, which describes the standards that Universal Aviation applies to protect Personal Data.

Please take the time to read this Notice carefully. If you have any questions or comments, please contact dataprivacy@univ-wea.com.

2. Scope

This Notice outlines why we use CCTV, how we use CCTV and how we process your Personal Data recorded by CCTV cameras to ensure we are compliant with data protection law and best practice.

3. Purpose of Processing

- 3.1 Universal Aviation uses CCTV for a number of purposes, including:
- To comply with legal or regulatory obligations
 - To detect, prevent or reduce the incidence of crime
 - To prevent and respond effectively to all forms of harassment and disorder
 - To reduce the fear of crime
 - To create a safer environment
 - To gather evidence by a fair and accountable method
 - To provide emergency services assistance
 - To assist with health and safety and other serious occurrences
 - To detect, prevent and reduce the incidence of any internal conduct and performance matters which can lead to Universal Aviation's disciplinary procedure being initiated

 - To support authorised parties including the police force, UK Border Force, the CAA, aviation authorities, air traffic control functions, airport operators and airport security
- 3.2 An incident may include theft, damage to property, an employee disciplinary investigation, violence, breaches of laws, regulations or policies applicable to Universal Aviation and other incidents that may impact upon the safety of people or property within Universal Aviation's premises as determined by Universal Aviation Management from time to time.
- 3.3 This list is not exhaustive and other purposes may be or become relevant.

4. Lawful Bases for Processing

Employees, contractors, visitors and travellers have legitimate expectations of reasonable privacy within Universal Aviation's premises. Where the use of CCTV is not a legal obligation, Universal Aviation has other obligations and responsibilities, which it must comply with and balance against the privacy rights of data subjects, particularly in respect of incidents affecting Universal Aviation. These obligations include protecting the vital interests of individuals and relying on Universal Aviation's legitimate interest to use CCTV for the purposes of securing and protecting its premises.

5. Position of cameras

5.1 Universal Aviation's CCTV surveillance monitors the following areas:

- a. external premises
- b. entrance lobby
- c. first floor corridor
- d. handling operations office
- e. arrivals lounge
- f. primary departure lounge
- g. security screening room
- h. store room
- i. European Operations Centre ("EOC") operations room
- j. Roof of the building

5.2 Camera locations are chosen to minimise viewing of spaces not relevant to the legitimate purpose of the monitoring. The CCTV system does not record sound.

5.3 Images are monitored by authorised personnel.

6. How we will operate any CCTV

6.1 Where CCTV cameras are positioned, signs are prominently displayed to alert individuals that their image may be recorded. Such signs contain details of Universal Aviation, as the controller operating the CCTV system, the purpose for using the surveillance system, who to contact for further information, and a hyperlink to this Notice.

6.2 Television monitors are located in four areas of the building, rolling live CCTV footage.

6.3 The CCTV system is regularly maintained in accordance with the manufacturer's instructions.

7. Use and retention of data gathered by CCTV

7.1 Access to footage

Images captured by Universal Aviation's CCTV system are kept on the CCTV system and monitored in a self-contained and secure room on Universal Aviation's premises. For operational purposes, and in accordance with the stated purposes of the CCTV system, only designated employees, trained in their duties, have access to live footage.

Access to recordings

For operational purposes and in accordance with the stated purposes of Universal Aviation's CCTV system, only designated employees shall have access to CCTV recordings. We may permit the viewing (or sharing of copies) of CCTV records with third parties such as the Police and employees where this is appropriate for security reasons or in connection with a serious incident, subject in each case to approval by Universal Weather and Aviation, LLC's General Counsel or Data Protection Officer.

Downloading of recorded material

Data should only be downloaded or saved if it forms part of an investigation into a serious incident including an employee's conduct or performance matter. Requests to view or receive

copies of CCTV recordings must be approved by Universal Weather and Aviation, LLC's General Counsel or Data Protection Officer.

At the end of their useful life, all images downloaded for a legitimate purpose in whatever format, are erased permanently and securely. Any physical matter such as tapes or discs are disposed of as confidential waste. Any still photographs and hard copy prints are disposed of as confidential waste.

8. Retention and erasure of data gathered by CCTV

Recordings of CCTV are held for a minimum rolling-basis of 30 days and then overwritten, unless there is a legitimate reason for downloading the footage (e.g. for the purposes of investigating alleged employee misconduct, for the investigation of an alleged or suspected crime etc.). The footage is then deleted as soon as the purpose for its download has been achieved (unless Universal Aviation is under legal obligation to retain such footage).

9. Use of additional CCTV cameras

- 9.1 Prior to placing a new CCTV camera in a location, Universal Aviation will carefully consider if it is appropriate by carrying out a data protection impact assessment ("**DPIA**"), where necessary and inform dataprivacy@univ-wea.com.
- 9.2 A DPIA will assist us in deciding whether new cameras are necessary and proportionate in the circumstances, and whether they should be used at all or whether any limitations should be placed on their use.
- 9.3 Any assessment will consider the nature of the problem that we are seeking to address at that time and whether a CCTV camera is likely to be an effective solution, or whether a better or less intrusive solution exists. In particular, we will consider the effect the CCTV camera will have on individuals and therefore whether its use is a proportionate response to the problem identified.
- 9.4 No surveillance cameras will be placed in areas where there is an expectation of privacy (for example, in changing rooms or washrooms) unless, in very exceptional circumstances, it is judged by us to be necessary to deal with very serious concerns.

10. Covert monitoring

- 10.1 Universal Aviation will never engage in covert monitoring or surveillance (that is, where individuals are unaware that the monitoring or surveillance is taking place) unless, in highly exceptional circumstances, there are reasonable grounds to suspect that criminal activity or extremely serious malpractice is taking place and, after suitable consideration, we reasonably believe there is no less intrusive way to tackle the issue.
- 10.2 In the unlikely event that covert monitoring is considered to be justified, any authorisation to use covert monitoring will be documented in writing. The authorisation will include confirmation that covert monitoring is required to obtain evidence of suspected criminal activity in a specific case, an assessment of the alternative methods of obtaining the evidence and the permitted duration of the covert recording. The authorisation will be regularly reviewed, for example, every 28 days, to assess whether it is continued to be required or should cease.
- 10.3 Only limited numbers of people will be involved in any covert monitoring.

11. Sharing of personal data

- 11.1 Universal Aviation may share personal data about employees, contractors, visitors and other individuals processed by Universal Aviation in accordance with this policy with:
 - Universal Aviation employees (where authorised to receive such information)
 - Service providers (e.g. companies engaged by Universal Aviation to provide maintenance on security services)

- Police and other crime prevention and law enforcement agencies as well as public and local authorities
- Legal advisers and insurers in respect of any claim or incident involving Universal Aviation
- Aviation authorities, air traffic control functions, airport operators and airport security
- Data subjects in accordance with their rights.

11.2 Personal data will only be shared where necessary for the purposes specified in this Notice and in accordance with legal and regulatory requirements applicable to Universal Aviation.

12. Security

12.1 **Technical Protective Measures:** We have put in place appropriate security measures to prevent personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. This includes the fact that the CCTV hard drives are password protected, for which only two employees are responsible for the code.

12.2 We have put in place procedures to deal with any suspected personal data breach and will notify any affected individuals and/or the ICO where appropriate.

13. Training

All staff who may be involved in the management or operation of the CCTV system will be trained in how to comply with this document and to ensure that the system is used in accordance with the law.

14. Individuals' Rights

14.1 The law provides individuals (data subjects) with the following rights in relation to their personal data held by Universal Aviation:

14.2 The right to:

- request access to their personal data (commonly known as a “data subject access request”). This enables them to receive a copy of the personal data we hold about them and to check that we are lawfully processing it;
- request correction of the personal data that we hold about them. This enables them to have any incomplete or inaccurate information we hold about them corrected;
- request erasure of their personal data in certain circumstances. This enables them to ask us to delete or remove personal data where there is no good reason for us continuing to process it. Data subjects also have the right to ask us to delete or remove their personal data where they have exercised their right to object to processing (see below); and
- request the restriction of processing of their personal data. This enables them to ask us to suspend the processing of personal data about them, for example if they want us to establish its accuracy or the reason for processing it.
- In addition, a data subject may object to the processing of their personal data where we are relying on a legitimate interest (or those of a third party) and there is something about their particular situation which makes them want to object to processing on this ground.

14.3 These rights are not absolute and are subject to various conditions under applicable data protection and privacy legislation and the laws and regulations to which Universal Aviation is subject to.

14.4 We will deal with any requests made from data subjects to exercise their above rights in accordance with the law.

14.5 A data subject has the right to make a complaint at any time to the ICO, the UK data protection regulator. The ICO can be contacted by telephone on 0303 123 1113 or by post as follows: Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or via email at casework@ico.org.uk. Universal Aviation would, however, appreciate the chance to deal with any concerns before the data subject approach's the ICO using the detail in **Section 16 (Contact Us)**

15. Breach of this Document

In relation to Universal Aviation employees, unauthorised access to or disclosure of CCTV footage, or other misuse of the CCTV system, or any other breach of this Notice or the law, may result in disciplinary action, including summary dismissal. Unauthorised use or disclosure of CCTV footage may also be a criminal offence.

16. Contact Us

Any queries or complaints about the CCTV system should be addressed dataprivacy@univ-wea.com