

Dash Cam Policy and Procedures

Contents List:

- 1 Policy Statement
- 2 Purpose and Scope
- 3 Principles
- 4 Dash Cam Footage
- 5 Employees
- 6 Non-Employees
- 7 Complaints
- 8 Monitoring and Review

1. POLICY STATEMENT

This policy sets out Group's position on the use of on-board incident capture devices (Dash Cams) in vehicles and its effect on employees.

2. PURPOSE AND SCOPE

The primary uses of Dash Cams are to assist in the Protection and Safety of Persons and Property, Prevention or Detection of Criminal Offences, Defence of Legal Claims, and most importantly, Driver Training.

It is not the Group's intended purpose to use Dash Cams for monitoring the work of employees or finding out whether or not they are complying with the organisation's policies and procedures.

3. PRINCIPLES

The following principles apply:

- a. Dash Cams will be installed when appropriate in company vehicles.
- b. Dash Cams are set up in a way that ensures that there is minimal intrusion of privacy, and that any intrusion is fully justified.
- c. All drivers are aware if there is a Dash Cam in their vehicle and have been provided with the manufacturer's overview sheet, which they are requested to sign. This exercise for new employees joining the driving team is carried out as part of their induction.
- d. No images and information will be stored except where a relevant incident has occurred. Dash Cams only retain up to 12 seconds of the incident.
- e. Access to retained images and information will be restricted, with clearly defined rules to Designated Responsible Persons (DRPs) who can gain access.

- f. The Dash Cam is not normally active and cannot be remotely viewed in real time. The Dash Cam cannot be accessed covertly to monitor the quality and amount of work completed by employees, nor can it be used in real time to track the employees' movements. However, where an incident is captured that reveals inappropriate conduct that cannot in good conscience be ignored, the Group and any Division thereof, reserve the right to process in the business interests. This may include grievance, or disciplinary proceedings, defence or litigation of a legal claim, and driver training.
- g. When relevant to do so, Dash Cam footage may be retained and used for future Health & Safety training, including the improvement in Safety Quality and Training of drivers. We shall seek the employee's consent, if we wish to use it for this purpose.
- h. Recorded images and information will be subject to appropriate security measures to safeguard against unauthorised access and use.

4. Dash Cam Recordings

Access is approved on an incident by incident basis. Once access is approved by the Designated Responsible Person, recorded footage can be reviewed (not deleted or amended) by:

- Chief Information Officer
- Directors
- Management
- Driver Trainers
- Statutory bodies such as Police, HSE, etc.

Any other person with interest must obtain authority from the Chief Information Officer to view recorded footage, providing reasons and justification.

Any persons whose images are recorded have a right to view those images, and to be provided with a copy of those images, within one month of making a written Subject Access Request. Availability of images will be subject to the retention period. Employees making such a request should do so in writing, providing the relevant time and date of the image, so that they may be easily identifiable. The request should be made to dataprotection@ballyvesey.com or by writing to the GDPR Steering Committee, Ballyvesey Holdings Limited, 607 Antrim Road, Mallusk, Newtownabbey, BT36 4RF.

5. EMPLOYEES

As stated, the primary uses of Dash Cams are to assist in the Protection and Safety of Persons and Property, Prevention or Detection of Criminal Offences, Defence of Legal Claims and Driver Training. However, when Dash Cams are deployed, they are likely to capture pictures of employees and workers.

In accordance with the principle at 3(f) above, Dash Cam evidence may be used as part of an employee investigation where, in the reasonable belief of management, that there may have been

misconduct, or a breach of Health and Safety. In such cases the footage must be requested by the Human Resources Manager.

Where footage is used in disciplinary proceedings, it will be retained for a further period of up to five years. The employee will be permitted to see and respond to the images, in addition to their right to request a copy, which will be provided within one month.

Under appropriate circumstances the footage may be provided to Police (or other Competent Authority) with the intention to prosecute for criminal offences. In defence of legal claims, or in pursuance of civil recovery, footage may also be provided to our legal representatives with the intention of providing evidence before the courts.

6. NON-EMPLOYEES

Where an incident involves a third party, the relevant insurers will be informed of the details. Although the third party may be made aware that there is recorded evidence in the form of Dash Cam footage, a copy of the recorded material can only be obtained if requested by the subject themselves.

Third Parties should also be aware that under appropriate circumstances the footage may be provided to Police (or other Competent Authority) with the intention to prosecute for criminal offences. In defence of legal claims, or in pursuance of civil recovery, footage may also be provided to our legal representatives with the intention of providing evidence before the courts.

7. COMPLAINTS

Complaints about the operation of the Dash Cam system should be addressed initially to dataprotection@ballyvesey.com or by writing to the GDPR Steering Committee, Ballyvesey Holdings Limited, 607 Antrim Road, Mallusk, Newtownabbey, BT36 4RF.

8. MONITORING AND REVIEW

This policy will be regularly reviewed, or sooner if there is a policy need or legislative change.

This policy does not form part of employees' terms and conditions of employment and may be subject to change at the discretion of the GDPR Steering Committee.