

# Information for CCTV Installers

## **Introduction to GDPR Safe**

A little about us and our Service



## Who we are

### GDPR Safe are market leaders in bespoke Data Protection Policies, designed specifically for CCTV and Video Doorbell operators

Founded in 2021 and headquartered in Leicestershire, GDPR Safe specialise in providing customised Data Protection Policy Documentation to both Domestic and Commercial clients.

Using an easy-to-use online platform, operators of CCTV and Video Doorbell equipment are asked a series of questions about the nature of their installation and how they intend to use it.

After answering a series of questions, the operator is able to download a tailored Data Protection Policy document specific to them, which explains their legal obligations in plain-English terms, and in a manner that is specific to their own circumstances. There is no "one size fits all", every policy is specific to a customer.

Our service helps to give CCTV Operators peace of mind at a time when members of the public are becoming increasingly willing to assert their privacy rights under the law.

## **Benefits to Installers**

How can CCTV Installers benefit from GDPR Safe?

### INCREASES REVENUES

Not only do GDPR Safe Policies increase revenue at the point of install, but they also serve as a source of recurring revenue from annual policy renewals, which is credited to your Distributor account automatically for use against future purchases.

### NO TRAINING NEEDED

Installers do <u>not</u> need tobecome experts in Data Protection Law.

Our system takes care of the complexities, allowing Installers to concentrate on what they do best.

### MINIMISES TIME ON-SITE

Our service has been designed with Installers in mind and requires very little effort on your part.

Most of the work is completed by the client themselves, after you've left site.

### MINIMAL ADMIN EFFORT NEEDED

Sell a GDPR Safe Policy once during an Installation or Maintenance Visit, and we'll handle the rest.

We handle renewals, chase payments and liaise directly with your Client on any queries.

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## **Benefits to Customers**

How can CCTV Operators benefit from GDPR Safe?

### **Peace of Mind**

Data Protection Legislation is a complex field that most people & many businesses will be unfamiliar with. A GDPR Safe Policy helps CCTV Operators to understand their obligations under the law in a manner that is easy to understand and in relation to their own use of CCTV.

Each Policy is unique to a Customer and based upon information that they provide – there's no one-size-fits-all, which is where traditional approaches to compliance often fall short.

### **Helps Mitigate Compensation Claims & Fines**

In October 2021, a Court ruled against an Oxfordshire Ring Doorbell owner in a Civil Action brought by a neighbour. The court found that the owner of the Ring Doorbell had invaded the privacy of their neighbour and conducted themselves in a manner that amounted to harassment.

A GDPR Safe Policy is intended to reduce the likelihood of such a ruling being made against a Policy Holder, or a Fine from the Information Commissioner's Office.

### **SAR Response Service**

Policy Holders can make use of our SAR Response Service. If a CCTV Operator ever receives a Subject Access Request (or "SAR") from an individual requesting access to footage, we'll assist them in assessing the request and how to respond to it lawfully.

## **Common Misconceptions**

Perceptions on Data Protection implications for CCTV Operators are often incorrect



### Data Protection Law Is a Complex Field

When talking to Installers and CCTV Operators alike, we often find that they have come to believe things about the law which are simply untrue – and it's easy to understand why.

To the right are a number of common misconceptions that we come across regularly – misconceptions which expose CCTV Operators to unnecessary legal risks every day.

GDPR Safe help to make this complex subject easier to understand for all.



#### **"GDPR DOESN'T APPLY SINCE BREXIT"**

**Wrong.** Whilst the original "EU GDPR" no longer applies to the UK, the provisions of that law were incorporated into a new UK law as part of Brexit which is now known as the "UK GDPR" - and is largely the same as the original EU legislation.

#### "DOMESTIC CCTV USERS ARE EXEMPT FROM GDPR"

**Wrong.** Data Protection law still applies to Domestic CCTV operators if they capture images from beyond the boundary line of a Domestic Property – as most installations do. An exemption only applies if you can demonstrate that images are restricted solely to areas within the property boundary.

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#### "GDPR WON'T BE AROUND FOR MUCH LONGER"

Wrong. Whilst the government have recently announced plans to reform Data Protection Legislation following Brexit, based on our current understanding of the proposals, we do not anticipate any significant changes in the way the law applies to most Domestic and Commercial CCTV Operators.

## **How it Works for Installers**

Purchasing and Activating Policy Packs



#### Step 1. Purchase our handy Policy Packs from a Distributor

Our Policy Packs can be purchased from a range of Distributors. They have an unlimited shelf-life and require minimal storage space. Each pack contains a set of instructions for your client to follow and a window sticker. They're perfectly sized for keeping a couple in the van!

#### **Step 2. Installer activates the Policy Pack**

The front of each Policy Pack features a unique QR Code. Scan this using the Camera App on a Mobile Device and follow the simple instructions. In as little as 60 seconds, the pack will be linked to an Installer account in your name. This ensures you receive recurring revenue from us when your customer renews. This can be done at any time – either on-site, or before they're loaded onto a van.

#### Step 3. Leave the pack with your Client

Each Policy Pack contains a set of simple instructions for your Client to follow. You may choose to help with this, but it is typically something they can do without help. Don't forget to include the pack on your Invoice to the Client. We recommend a selling price of £25 + VAT, but the selling price is up to you.

## **Customer Activation – Installation Type**

Our policy documents are specific to an individual customer's needs

When a Customer follows the instructions contained within our Policy Pack, they're first asked about the nature of their installation:

#### DOMESTIC INSTALLS SIMPLE & QUICK TO COMPLETE

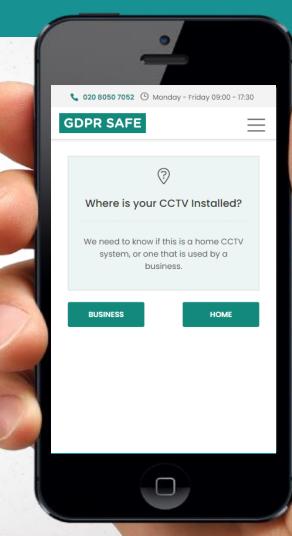


Domestic CCTV Operators are asked a series of questions which are tailored to the typical usage of a home CCTV or Video Doorbell Installation.

### COMMERCIAL INSTALLS

#### MORE COMPLEX QUESTIONING

Where the client indicates that they wish to create a policy for a Commercial Install, the questions asked are more indepth, and cover additional usage scenarios not typical for domestic users (ANPR, Facial Recognition, Covert etc.).



## **Customer Activation - Questionnaire**

Customers are asked a series of simple questions, most of which are multiple choice

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| -        |   | _   | 1   |  |   |                         | 1000          | GDPR SAFE  | -                        |
| DPR S    |   | =   |   | GDPF   |   | =                       |               | Please provide<br>description for<br>cameras in u<br>proper              | each of the<br>se on the |
|          | ?<br>at purpose has the C<br>stem been installed?                                     | стv |   | Wa   | s the CCTV Install<br>by any particular   |                         |               | This information is use<br>questions to identify inc                     | dividual cameras.        |
| v        | of a CCTV System must co<br>vith Data Protection Laws.<br>nust have a legitimate reas |     |   |  | ere was a specific incide<br>the decision to install C<br>combination of incident<br>indicate so belo | CTV, or a<br>ts, please |               | You may find it helpful<br>names used to identify<br>recording device du | cameras on your          |
|          | ng your use of the equipme<br>nay be challenged in a cou<br>law at a later date.      |     | 7   |  | h incidents can help to<br>cumented justifications<br>the equipment at a lat                          | for installing          | -             | Reception Car Park Ent   |                          |
|          | e prevention and investigation of<br>me.  |     |   | No, no specific event led to the installation. |   |                         | Car Park Exit |  |                          |
| em       | blic safety and the safety of<br>ployees and other visitors t<br>perty.               |     | Yes, a burglary or attemp<br>at the property. |  | mpted burglary  |                         | - Goods In    | Вау  |                          |
|          | to help satisfy the criteria of an insurance policy.                                  |     |   |  | Yes, a burglary or attempted burglary at a nearby property.   |                         |               | ADD CAMERA   | NEXT                     |
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Most customers can be up and running in less than 15 minutes

## **Download or Print Policy Document**

After answering all questions, customers can download a PDF copy of their GDPR Safe Policy Documents





#### **PRINT OR DOWNLOAD DOCUMENTS**

The GDPR Safe Policy Document contains important details relating to how the CCTV Operator has indicated they plan to use the system and explaining their legal obligations.

#### **DISCUSS WITH NEIGHBOURS**

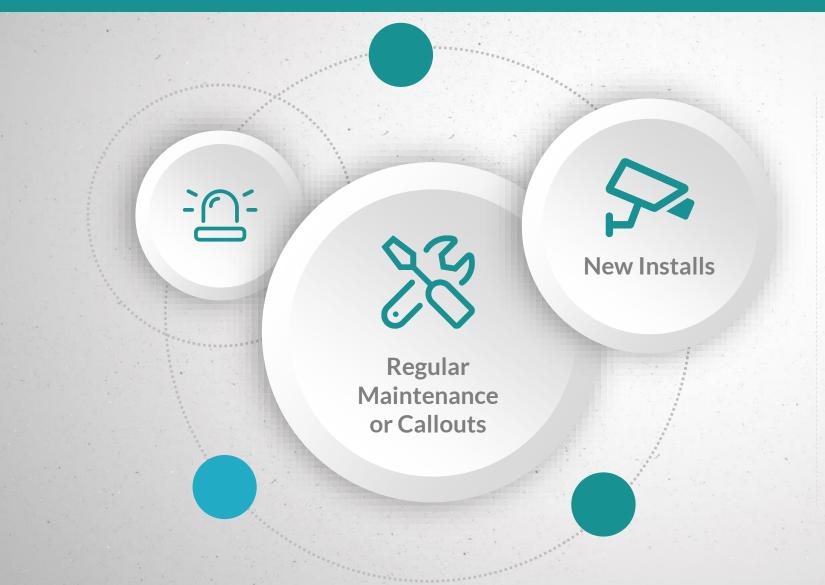
Part of the operator's legal obligations under UK Data Protection Law is to operate their CCTV or Video Doorbell in a "Transparent" manner. Sharing copies of a GDPR Safe Policy Document with neighbours and talking to them about what you're doing (and why) helps to demonstrate your efforts towards being transparent.

#### SHARE WITH ENQUIRING PARTIES

Members of the public have the right to be informed that you are using CCTV to capture images of them. They have a right to know why you're doing so and what measures you have put in place to protect their data. A GDPR Safe Policy document details all this information and should be shared with anyone who requests it.

## How can you sell GDPR Safe?

A GDPR Safe Policy is a low-cost purchase that can be introduced to customers at various points.



### How to sell GDPR Safe

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There are numerous opportunities to discuss GDPR Safe with your clients, here are some common ones that installers have had success with in the past:

> New Installations are the perfect opportunity to highlight a client's legal obligations and to explain how a GDPR Safe Policy can help them to meet them.

Callouts are also a good opportunity to ask client's if they're aware of their obligations – and to see what measures they already have in place.

Annual maintenance visits are a great opportunity to sell GDPR Safe Policies. You might be there for something else (intruder / fire / access etc), but notice they have CCTV or a Video Doorbell installed.

Existing Customers are also a great opportunity. If you have a mailing list, website or business page on Social Media, mention that you supply GDPR Safe Policies – we'll even supply artwork and email templates for you.





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Whilst every effort has been taken to ensure accuracy in all statements within this material, if you believe anything to be incorrect, we would be glad to hear from you so that we may correct any inaccuracies as soon as possible. We'll also be glad to help further explain anything that may be unclear - simply contact us using the contact details above.

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