

LARS/GFUK HOLDINGS LIMITED CCTV POLICY

1. INTRODUCTION

- 1.1 LARS/GFUK HOLDINGS LIMITED has installed Closed Circuit Television Video ("CCTV") systems to enhance the safety and security of employees, customers, visitors and corporate assets.
- 1.2 LARS/GFUK HOLDINGS LIMITED takes the privacy of its customers and employees seriously. This CCTV Policy has been created to set out the accepted use and management of CCTV systems and images. It aims to ensure that LARS/GFUK HOLDINGS LIMITED complies with all relevant privacy and data protection legislation.

2. RESPONSIBILITY FOR CCTV SYSTEMS

- 2.1 LARS/GFUK HOLDINGS LIMITED CCTV systems are operated under the supervision or direction of Subash Thamboo. Subash Thamboo is responsible for the general operation of the system and ensuring compliance with this Policy and applicable law.

3. PURPOSE OF CCTV SYSTEMS

- 3.1 LARS/GFUK HOLDINGS LIMITED has installed CCTV systems to deter, detect, record and allow analysis of any type of incident (malicious actions such as theft or vandalism, accidents, fires, floods and other emergency situations).

4. PLACEMENT AND OPERATION OF CCTV SYSTEMS

- 4.1 LARS/GFUK HOLDINGS LIMITED recognises the need to balance an individual's right to privacy with the need to ensure the safety and security of LARS/GFUK HOLDINGS LIMITED employees, customers, visitors and corporate assets.
- 4.2 As a general principle and subject to paragraph 11:
 - 4.2.1 internally, LARS/GFUK HOLDINGS LIMITED will not employ CCTV equipment in private areas, such as restrooms, toilets or changing rooms; and
 - 4.2.2 externally, LARS/GFUK HOLDINGS LIMITED will only capture images of public streets and buildings which do not belong to LARS/GFUK HOLDINGS LIMITED where permitted by local law.
- 4.3 Subash Thamboo responsible for checking CCTV systems regularly to ensure that they are functioning correctly and collecting CCTV images to a sufficient standard to allow the purposes for the system to be met. As part of these reviews, Subash Thamboo should also check that the use of each camera remains proportionate to its purpose.

5. ACCESS TO CCTV IMAGES

- 5.1 Only authorised personnel have permission to operate the CCTV systems and view the images.
- 5.2 LARS/GFUK HOLDINGS LIMITED anticipates access by the following groups:

- 5.2.1 security teams (who may be located both onsite and offsite);
 - 5.2.2 LARS/GFUK HOLDINGS LIMITED Human Resources and appropriate management;
 - 5.2.3 LARS/GFUK HOLDINGS LIMITED internal and external legal advisers;
 - 5.2.4 Yum! Brands, Inc. and LARS/GFUK HOLDINGS LIMITED; and
 - 5.2.5 Police, law and regulatory enforcement;
- 5.3 Access to individuals in these groups must be authorised by Subash Thamboo. Such authorisation should always be given in writing using the authorisation form in Appendix 1.
- 5.4 In limited circumstances, the images may also be disclosed to third parties (e.g. landlords, individuals displayed on images - please see section on Individual Requests for further details). These must also be authorised using the form in Appendix 1.

6. USE OF CCTV NOTICES

- 6.1 LARS/GFUK HOLDINGS LIMITED will use CCTV notices where required by law.
- 6.2 Subash Thamboo must ensure that notices meet the requirements of local law, for example, in relation to:
- 6.2.1 content of the notice;
 - 6.2.2 location of the notice; and
 - 6.2.3 inclusion of contact details for more information.
- 6.3 LARS/GFUK HOLDINGS LIMITED shall post signs on the premises to notify employees, customers and visitors that CCTV systems are in used. The signs shall include the wording provided in Appendix 2.
- 6.4 In addition to posting CCTV signs, each LARS/GFUK HOLDINGS LIMITED shall retain hard copies of the CCTV customer privacy notice contained in Appendix 3 on the store premises and available upon a request from a customer.
- 6.5 All CCTV systems shall be easily visible and appropriately notified to individuals, unless the Subash Thamboo determines that it is legally required to conduct CCTV monitoring and providing notice would frustrate that purpose.

7. SECURITY MEASURES

- 7.1 LARS/GFUK HOLDINGS LIMITED will take all reasonable and practicable steps to ensure that the CCTV systems and images are protected against unauthorised or unlawful processing and against accidental loss, destruction or damage.

8. DATA RETENTION

- 8.1 As a general rule, and except as provided in 8.2, recorded footage and images will be retained for no longer than 35 days from the date of recording. At the end of the permitted retention period, the videos and images will be permanently overwritten.

- 8.2 Where there is cause, CCTV footage and images relating to a specific incident or series of incidents may be copied and retained beyond the standard retention period. Longer retention will only be permitted where required as evidence for internal investigations, the investigation of crime or as otherwise required or permitted by local law.
- 8.3 Where an extended retention is no longer justified, all affected images and copies of the images must be permanently erased and securely destroyed. This extends to any hard copies of the images.

9. INDIVIDUAL ACCESS REQUESTS

- 9.1 Individuals, including LARS/GFUK HOLDINGS LIMITED employees, customers and members of the public, have the right to access the personal data LARS/GFUK HOLDINGS LIMITED holds about them. In some circumstances, individuals also have the right to request the deletion of their personal data. This includes CCTV images.
- 9.2 If LARS/GFUK HOLDINGS LIMITED employees are asked by an individual how to obtain a copy of, or to delete, CCTV images LARS/GFUK HOLDINGS LIMITED holds of them, this should promptly be reported to Subash Thamboo who will advise on next steps.
- 9.3 If LARS/GFUK HOLDINGS LIMITED employees receive a written request for CCTV access or deletion, this should be sent directly to Subash Thamboo.
- 9.4 Subash Thamboo must consider whether to grant the request, taking into account local legal requirements such as:
- 9.4.1 whether the person making the request has provided evidence of their identity;
 - 9.4.2 whether the CCTV images of that individual also contain images of third parties and whether those third parties can be obscured;
 - 9.4.3 in the case of deletion, whether LARS/GFUK HOLDINGS LIMITED has a legal or other compelling justification to override the request, taking into account the risks to the individual;
 - 9.4.4 whether any exemptions to disclosure might apply.
- 9.5 Subash Thamboo should document their decision on responding to access and deletion requests in the form in Appendix 1. If Subash Thamboo has any concerns or questions when considering if disclosure is appropriate, they should refer this to the Managing Director.

9.6 COMPLAINTS REGARDING THE OPERATION OF CCTV SYSTEMS

- 9.7 Complaints regarding the CCTV system and its operation must be given to Subash Thamboo for resolution. In case of doubt or dispute, Subash Thamboo must immediately report this to the Managing Director

10. DEVIATION FROM THIS POLICY

- 10.1 Any deviation from the LARS/GFUK HOLDINGS LIMITED CCTV Policy must:

- 10.1.1 Ensure that privacy and personnel data protection are respected; and
- 10.1.2 Be authorised in writing by the Subash Tamboo

APPENDIX 1 – IMAGE ACCESS/DISCLOSURE ASSESSMENT

LARS/GFUK HOLDINGS LIMITED entity and country	
Type of request	[Internal Access or Disclosure Authorisation/Police Disclosure Request/Personal Access Request]
Is there a legal basis for sharing the information?	[Assessor to note whether: <ul style="list-style-type: none"> i) access/disclosure is required by court order/law; or ii) access/disclosure is justifiable on the basis of the legitimate interests of LARS/GFUK HOLDINGS LIMITED or the requester, and is not outweighed by the rights of those being monitored]
Is the sharing covered in applicable CCTV notices?	
What controls are applied to this access/disclosure	[Assessor to include conditions on access/disclosure: <ul style="list-style-type: none"> i) is viewing of images restricted to a secure location with appropriate access controls? ii) are appropriate techniques used to prevent further dissemination of images? iii) are controls such as pixellation going to be used?
Are there any relevant exemptions to access/disclosure	[Assessor to consider applicable exemptions under relevant data protection law, such as: <ul style="list-style-type: none"> i) third party personal data; or ii) prejudice to prevention or detection of crime]
Decision	

APPENDIX 2 – CCTV NOTICE TEMPLATE

AREAS SUBJECT TO CCTV

For more information, including your rights,
please ask for the Restaurant General Manager or
contact kevin@gfuk.net

APPENDIX 2 – CCTV CUSTOMER PRIVACY NOTICE

LARS/GFUK HOLDINGS LIMITED - EMPLOYEE PRIVACY NOTICE

This CCTV Customer Privacy Notice tells you how LARS/GFUK HOLDINGS LIMITED process the information we capture via our CCTV systems. It also describes your data protection rights, including a right to object to some of the processing which LARS/GFUK HOLDINGS LIMITED carries out. More information about your rights, and how to exercise them, is set out in the Your Choices and Rights section.

Our Use of CCTV

To protect our facilities, assets and personnel, and to deter, detect, record and allow analysis of any type of incident, including malicious actions such as theft or vandalism, accidents, fires, floods and other emergency situations, LARS/GFUK HOLDINGS LIMITED has installed CCTV cameras throughout its premises.

LARS/GFUK HOLDINGS LIMITED recognises the need to balance an individual's right to privacy with the need to ensure the safety and security of LARS/GFUK HOLDINGS LIMITED employees, customers, visitors and corporate assets. LARS/GFUK HOLDINGS LIMITED will not employ CCTV equipment in private areas, such as restrooms, toilets or changing rooms. Where CCTV is deployed externally, LARS/GFUK HOLDINGS LIMITED will only capture images of public streets and buildings where permitted.

Only authorised personnel have permission to operate the CCTV systems and view the images, including security teams, human resources and appropriate management, internal and external legal advisors, and police, law and regulatory enforcement authorities.

Unless LARS/GFUK HOLDINGS LIMITED can demonstrate it is otherwise justified, LARS/GFUK HOLDINGS LIMITED will not deploy covert CCTV technology. Notice of CCTV filming will be provided in the vicinity of any recorded space.

Why We Collect, Use and Store this Personal Data

We deploy CCTV for our legitimate business interests in maintaining the security and integrity of our facilities and for use in connection with legal claims, compliance, regulatory, auditing, investigative and disciplinary purposes and other ethics and compliance reporting requirements. We take the precautions to ensure that our interests do not infringe upon your data protection rights.

We may also process your personal data contained within CCTV footage where necessary to comply with a legal obligation, such as disclosures to law enforcement agencies or in connection with legal claims, health & safety compliance, regulatory, investigative and disciplinary purposes (including disclosure of such information in connection with legal process or litigation).

How Long We Retain CCTV Footage

As a matter of course, we retain the footage we collect for no longer than 35 days, after which any collected footage is overwritten, deleted or destroyed. We only retain copies of select portions of film where there is a specific and justified reason to do so, including for investigative or legal purposes. We retain such copies only for as long as needed for the identified purpose and a reasonable period thereafter to defend against ongoing, reasonably anticipated or potential legal claims.

How We Share Your Personal Data

We may share some of your personal data with **other members of the** LARS/GFUK HOLDINGS LIMITED where necessary for the relevant investigatory, disciplinary or crime prevention purpose. Your personal data will also be shared with **companies providing services under contract** to LARS/GFUK HOLDINGS LIMITED, such as the companies that provide and maintain our CCTV systems.

We also share your personal data, where relevant and appropriate, with law enforcement authorities, regulatory authorities, legal advisors, investigators and auditors, parties to pending litigation, and other members of the public that can demonstrate a legitimate need to for the data relating to a specific incident.

Your Choices and Rights

You have the right to ask LARS/GFUK HOLDINGS LIMITED **for a copy** of your personal data; to **correct, delete or restrict** processing of your personal data; and to **obtain the personal data you provide in a structured, machine readable format**. In addition, you can **object to the processing** of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement or compelling interest). Where we have asked for your consent, you may **withdraw consent** at any time. If you ask to withdraw your consent to LARS/GFUK HOLDINGS LIMITED processing your data, this will not affect any processing which has already taken place at that time.

These **rights may be limited**, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law or have compelling legitimate interests to keep. If you have unresolved concerns, you have the **right to complain** to the data protection authority in the country you reside, where you work or where we are located.

International Transfers

Your personal data may be processed in or accessed from jurisdictions outside the European Economic Area ("**EEA**") by us and by some of the third parties to whom we share your personal data. We rely on the EU-U.S. Privacy Shield Framework to transfer your personal data to Yum! Brands, Inc. in the United States. When we transfer your data to organisations outside the LARS/GFUK HOLDINGS LIMITED group we use European Commission-approved standard contractual clauses to safeguard the transfer. Where we transfer personal data to a third party that has implemented Binding Corporate Rules, we may rely on them to safeguard the transfer. For further information, including to obtain a copy of the documents used to protect your information, please contact us as described in the Contact Us section below.

Contact Us

The data controller for your personal data will be Subash Tamboo.

If you have questions about this policy or wish to contact us for any reason in relation to our personal data processing, please contact us at First floor Office, Arlington Way, Battlefield Road, Shrewsbury, Shropshire, SY1 4AB, United Kingdom