

Closed Circuit Television (CCTV) Policy

New South Wales

SSP Australia Catering Pty Ltd ACN 134 475 924

SSP Australia Airport Concessions Pty Ltd ACN 635 555 476

SSP Australia Airport F&B Pty Ltd ACN 635 555 538

WA Airport Hospitality Pty Ltd ACN 159 898 030

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1 Objective, Scope and Implementation

1.1 CCTV at SSP Premises

SSP Australia Catering Pty Ltd ACN 134 475 924, SSP Australia Airport Concessions Pty Ltd ACN 635 555 476, SSP Australia Airport F&B Pty Ltd ACN 635 555 538 and WA Airport Hospitality Pty Ltd ACN 159 898 030 (individually or collectively known as **SSP**) operate and control a number of closed circuit television (**CCTV**) cameras installed in food outlets located in various travel locations across Australia (**Premises**).

1.2 Application and Scope

This CCTV Policy (**NSW Policy**) applies to all employees, management, contractors, customers and any other visitors at SSP's Premises located in New South Wales (**NSW Premises** or **NSW Locations**). This NSW Policy sets out how SSP may use, install, operate and control CCTV cameras at the NSW Premises.

SSP will ensure that the way in which footage and personal information is recorded, collected, handled, stored, disclosed and/or otherwise used through the use of CCTV camera monitoring systems (**CCTV Monitoring Systems**) at NSW Locations falls within the guidelines prescribed by all relevant Federal laws, regulations and guidelines pertaining to, and as further set out in, this CCTV Policy and/or SSP's National Policy (as applicable)

SSP's use of the CCTV Monitoring System in the NSW Locations does not include use of audio recording devices.

1.3 Objectives

SSP may install CCTV cameras at each NSW Location for one or more of the following purposes:

- (a) to ensure that relevant legislation, regulatory requirements, professional standards and guidelines are identified and compliance is maintained at all of SSP's NSW Premises;
- (b) to ensure that any conditions regarding CCTV as imposed under a liquor licence (if any) are complied with in accordance with the *NSW Liquor Act 2007* (NSW) (**NSW Liquor Act**), the *Liquor Regulation 2018* (NSW) (**NSW Liquor Regulation**) and other applicable Government Liquor Guidelines;
- (c) to meet legal requirements and guidelines for the prevention of crime, public safety, public disorder and public nuisance at the across all NSW Premises;
- (d) to provide an effective means by which to dissuade, reduce and prosecute crime across all NSW Premises through an increased awareness of the intended detection and apprehension of offenders;
- (e) to assist in internal and external investigation of criminal activity at the NSW Premises;
- (f) to identify, respond to and assist in the factual, accurate and speedy reconstruction of the circumstances of incidents taking place at the NSW Premises;
- (g) to enable the supply of Footage to law enforcement agencies and other local authorities upon request;
- (h) to enhance the general safety and security of employees and visitors at the NSW Premises through effective monitoring policies;

- (i) to monitor crowd flow and behaviour at the NSW Premises;
- (j) to protect SSP's property and other assets at the NSW Premises;
- (k) to ensure employee compliance with legal and organisational regulations, policies and guidelines;
- (l) to support training and management of SSP's employees;
- (m) to support general organisational and operational requirements; and
- (n) for general work, health and safety purposes.

2 Essential Guidelines & Requirements

2.1 Monitored Areas

CCTV cameras may be installed at the following general locations at the NSW Premises (as applicable) (**Monitored Areas**):

- (a) entry and exit points;
- (b) checkout counters;
- (c) office and general employee areas;
- (d) kitchen and storage rooms;
- (e) service, dining and other visitor areas;
- (f) hallways;
- (g) goods receipt areas;
- (h) other relevant areas.

At no point will CCTV cameras be installed in any Private Places, nor will the CCTV cameras be positioned in a manner that may record a person in any Private Place.

2.2 CCTV Installation

CCTV cameras will be installed and mounted:

- (a) by a licenced security installation company or such other person with appropriate CCTV installation experience engaged by SSP;
- (b) at proper distances and at a proper inclination to optimise surveillance and provide clear and recognisable images;
- (c) to adequately capture images for any relevant purposes and requirements (including proper identification of visitors and handling of goods and monies at the NSW Premises);
- (d) in visible locations across the Monitored Areas (cameras will not be installed in Private Places); and
- (e) to an adequate standard to ensure safety.

2.3 CCTV Operation

- (a) The operation of the CCTV Monitoring System at the NSW Locations will be in accordance with New South Wales legislative requirements and other appropriate Federal laws (where applicable).

- (b) In accordance with the *Workplace Surveillance Act 2005* (NSW), SSP will not commence surveillance of employees without prior notice to the employee.
- (c) SSP will ensure the use of the CCTV Monitoring System across the NSW Location will meet the requirements prescribed by the NSW Liquor Act, the NSW Liquor Regulation and other applicable Government Liquor Guidelines;
- (d) The CCTV Monitoring System will operate in real time on a continuous 24-hour basis, seven (7) days per week.
- (e) Where specifically designed as part of an awareness and deterrent measure, some monitors may be made available at some NSW Premises to display certain CCTV images to employees and visitors within indicated publicly accessible areas (**Public Monitors**).
- (f) With the exception of Public Monitors, access to any other monitors displaying CCTV Footage (whether in real time or otherwise) will be restricted to Authorised Personnel.
- (g) CCTV recording equipment will be kept within secure areas and may only be accessed by Authorised Personnel.

3 Collection and Storage of Footage

3.1 Collection and Storage

CCTV images captured and recorded at the NSW Premises (**Footage**) will:

- (a) be captured in real time;
- (b) be stored on a secure digital drive located at a designated location controlled by SSP or a designated service provider engaged by SSP in Australia or overseas;
- (c) be retained for the recommended minimum data retention period for recorded footage as specified by the Australian Standards or as otherwise legally required (or otherwise in accordance with this Policy as amended by SSP from time to time); and
- (d) be fully documented in a separate register held and controlled by SSP.

3.2 Disposal of Footage

Footage captured and recorded at NSW Premises will generally be stored for a minimum of 30 days in accordance with the NSW Liquor Act and the NSW Liquor Regulation, or for such other period as prescribed by the NSW Liquor and Gaming from time to time, after which it may be disposed of (unless the Footage pertains to an incident or other occurrence taking place at a NSW Premises requiring Footage to be stored for a longer period of time).

3.3 Access to Stored Footage

- (a) Access to Footage and storage areas (both physical monitoring areas and digital storage areas) will be restricted to Authorised Personnel only or (where required by law) an Authorised Officer.
- (b) Footage will not be accessed or viewed by any personnel or other individual who does not hold written express authority from SSP to access or view such Footage (with the exception of Authorised Officers or as otherwise permitted or required by law).

- (c) All Authorised Personnel involved in the recording, observation and capture of Footage will be appropriately trained and informed of their responsibility to act in an ethical and lawful manner in respect of the CCTV Monitoring Systems and any recorded Footage in accordance with this Policy, the National Policy and any other relevant legislation.
- (d) A minimum of one Authorised Personnel will have the capability to access stored Footage at the NSW Premises at all times.
- (e) In the event SSP becomes aware of any inappropriate or unlawful use of the CCTV Monitoring System or Footage, SSP will take appropriate measures to minimise any potential damage and eliminate (to the fullest extent possible) the risk of reoccurrence, including taking disciplinary action as appropriate.
- (f) Any inappropriate or unlawful use of the CCTV Monitoring System or Footage by any employee of SSP will be considered a severe breach of SSP's Employment Code of Conduct and will be handled accordingly, including (where appropriate) referral to law enforcement agencies or other authoritative bodies.
- (g) SSP will ensure appropriate internal policies and protocols are in place to restrict access to and sharing of Footage within and outside the organisation.

4 Use and Disclosure of CCTV Footage

4.1 Rights to Privacy

- (a) SSP must uphold the rights to privacy of all employees, contractors, customers and other visitors to a Monitored Area at all times and will ensure that any use of CCTV cameras and Footage complies with this CCTV Policy and any applicable Australian Privacy Principles and regulations.
- (b) SSP will formally advise all employees that CCTV is used throughout the NSW Premises and that the employee is subject to CCTV monitoring upon commencement of employment with SSP.
- (c) No copies of Footage will be created for entertainment, personal, or commercial use.
- (d) Recording and viewing of Footage will be conducted for Authorised Purposes only.

4.2 Disclosure of Footage

- (a) SSP will keep Footage available for inspection and viewing at the NSW Premises by an Authoriser Officer until permitted or required to dispose of the Footage under the NSW Liquor Act, NSW Liquor Regulation, applicable Government Liquor Guidelines and any other applicable Federal and NSW laws and regulations.
- (b) SSP may be required to disclose Footage to specific Authorised Officers, including a licensing inspector (as applicable), upon request.
- (c) SSP will not disclose or use Footage unless the disclosure or use is:
 - (i) if the Footage is of an employee:
 - (A) for a legitimate purpose related to SSP's employment of its employees; or
 - (B) for legitimate business activities or functions;

- (ii) requested by a member or officer of a law enforcement agency in connection with the detection, investigation or prosecution of an offence;
- (iii) requested by a liquor licensing inspector or other Authorised Officer;
- (iv) related to the commencement of or existing civil or criminal proceedings;
- (v) reasonably believed to be necessary to avert an imminent threat of serious violence; or
- (vi) for another legally permitted or required purpose.

4.3 Footage and Data Security

- (a) To ensure the security of any Footage captured by the CCTV Monitoring System at the NSW Premises, SSP will take all reasonable steps to ensure:
 - (i) the CCTV Monitoring System remains in full working order at all times by regularly inspecting and servicing the system (as may be required);
 - (ii) the CCTV Monitoring System and Footage can only be accessed by Authorised Personnel;
 - (iii) Footage captured by the CCTV Monitoring System is stored in a fully secure fashion (such as on a cloud based system with appropriate encryption or on a DVR hard drive system with appropriate security measures implemented for restricted access);
 - (iv) access to the CCTV Monitoring System and Footage is restricted in accordance with appropriate security measures (including restricted personnel access, encryptions and/or password protection, as applicable);
 - (v) all Authorised Personnel are properly trained on the appropriate use of the CCTV Monitoring System at the NSW Premises; and
 - (vi) Footage identifying one or more individuals will not be shared with other individuals or organisations outside of SSP's Authorised Personnel (excluding disclosure to law enforcement agencies and other relevant local authorities whereby SSP is permitted or required by law to disclose such Footage).
- (b) Appropriate security measures and audit trails will be established against unauthorised access, alteration, disclosure, accidental loss or inadvertent destruction of recorded material.
- (c) Recorded material will be treated according to the procedures set out in this CCTV Policy to ensure security and continuity of evidence.

4.4 Confidentiality

SSP will implement reasonable procedures to ensure that:

- (a) all Authorised Personnel with access to the CCTV Monitoring System and/or Footage will keep confidential any and all information obtained through the CCTV Monitoring System;
- (b) Authorised Personnel will not be permitted to copy, discuss, provide or otherwise disclose information or Footage concerning an incident or any other occurrence

unless expressly permitted or required by law or as otherwise permitted in writing by SSP from time to time in accordance with this CCTV Policy; and

- (c) all employment contract and other third party agreements concerning access to and/or use of the CCTV monitoring System and/or Footage incorporate appropriate confidentiality terms.

4.5 Request for Access to Footage

4.5.1 Contact details for requests

Requests for disclosure of Footage should be made to SSP's Privacy Officer: cctv.request@ssp-au.com.

4.5.2 Employee requests

Requests for access to Footage by employees of SSP will be managed in accordance with the Australian Privacy Principles as they pertain to the State of New South Wales.

4.5.3 Customer and visitor requests

Request for access to Footage by customer and other visitors to NSW Premises will be managed in accordance with Australian Standards and other applicable Australian Privacy Principles and regulations.

4.5.4 Requests by relevant authorities

Request for access to Footage by law enforcement agencies or other local, government or other authorities (such as Federal or State law enforcement agencies) will be managed in accordance with the NSW Liquor Act, the NSW Liquor Regulation, applicable Government Liquor Guidelines, Australian Standards and any other relevant Federal and NSW laws as applicable.

4.5.5 Supporting evidence

A request for Footage must be accompanied by:

- (a) appropriate justification for why the Footage is required; and
- (b) where applicable:
 - (i) a detailed explanation of its connection to any open and authorised line of enquiry; and
 - (ii) the relevant authority under which the request is being carried out.

4.5.6 Actioning of requests

Requests will be considered in accordance with this Policy and will be actioned within two (2) business days of receipt (unless exceptional circumstances apply).

5 Signage and Notice

5.1 Appropriate signage will be displayed at all NSW Premises alerting employee, customers and other visitors to the NSW Premises that CCTV cameras are in operation at the NSW Premises (**Signage**).

5.2 Signage will be:

- (a) clearly visible and displayed in a way as to make patrons aware of the CCTV monitoring at the NSW Premises;
- (b) displayed at all entrance/access points to the NSW Premises; and

- (c) mounted as close as practical to an adult's line of sight to ensure prominent visibility.
- 5.3 Employees employed at the NSW Premises will be informed of the installation of CCTV Monitoring Systems at the NSW Premises upon commencement of employment with SSP to ensure each employee is aware:
- (a) they are being recorded and monitored whilst on the NSW Premises; and
- (b) the Footage captured by the CCTV Monitoring System may be used for purposes pertaining to their employment at set out in this Policy.
- 5.4 The use of CCTV at the NSW Premises will comply with:
- (a) this CCTV Policy;
- (b) the National Policy;
- (c) the *Surveillance Devices Act 2007* (NSW);
- (d) the *Surveillance Devices Regulation 2022* (NSW);
- (e) the *Workplace Surveillance Act 2005* (NSW);
- (f) the *Privacy Act 1988* (Cth);
- (g) the *Privacy and Personal Information Protection Act 1998* (NSW);
- (h) the Australian Privacy Principles;
- (i) the NSW Liquor Act;
- (j) the NSW Liquor Regulation; and
- (k) any other relevant Federal laws and guidelines relevantly pertaining to this CCTV Policy and/or the National Policy.

6 Complaints & Enquiries

- 6.1 Persons with complaints or enquiries regarding the purpose, collection or use, or other aspects of CCTV Monitoring System should be directed to SSP's Privacy Officer: cctv.request@ssp-au.com.
- 6.2 Complaints received in relation to personal information collected through the operation of CCTV Systems at the NSW Premises will be considered and addressed by the SSP Privacy Officer in accordance with the *Privacy Act 1988* (Cth).

7 Definitions

The following definitions apply in this CCTV Policy, unless context provides otherwise:

Australian Privacy Acts and Regulations means the *Privacy Act 1988* (Cth), the *Privacy and Personal Information Protection Act 1998* (NSW) and any other privacy laws or regulations pertaining to the State of New South Wales as amended from time to time.

Australian Privacy Principles means the privacy protection framework encompassing the underlying rules and doctrines applicable in Australia in respect of the collection, use, disclosure and other handling of personal information and incorporates the Australian Privacy Acts and Regulations.

Australian Standards means Australian Standard 4806-2006: Closed Circuit Television (CCTV) – Management and Operation.

Authorised Personnel means any delegated employee or other staff members of SSP, or a designated service provider engaged by SSP in Australia or overseas, with responsibility for managing access to and review of CCTV Monitoring Systems and Footage.

Authorised Purpose means a purpose set out in clause 1.3 of this CCTV Policy or for another purpose legally made in accordance with the needs of an Authorised Officer or as otherwise provided for by law.

Authorised Officer means an officer or representative of a New South Wales or Federal law enforcement agency or other relevant local, government or other authority, including an authority or other agency that is authorised by the New South Wales Liquor and Gaming Director to deal with the operation of CCTV System in New South Wales.

CCTV or Closed Circuit Television means a television system that transmits images on a 'closed loop' basis, where images are only available to those directly connected to the transmission system.

CCTV Monitoring System means all aspects of CCTV surveillance and management at or in connection with SSP's Premises, including the recording and maintenance of, and access to, Footage.

Footage means CCTV images captured and recorded by the CCTV Monitoring System at the NSW Premises.

Government Liquor Guidelines means any rules or code of practice developed by the relevant Liquor authority in New South Wales or otherwise within Australia.

Liquor and Gaming NSW means the department or body responsible for managing the development, implementation and integrity of the overall regulatory framework across alcohol, licensed clubs, charitable fundraising and gambling activities in New South Wales.

National Policy means SSP's national CCTV Policy applicable to all SSP's Premises across Australia.

NSW means the State of New South Wales, Australia.

NSW Location means the location of SSP's food outlets situated in various travel locations across New South Wales.

NSW Premises means SSP's food outlets situated in various travel locations across New South Wales.

Policy or CCTV Policy means this CCTV policy.

Premises means SSP's food outlets situated in various travel locations across Australia.

Privacy Officer means the person or department employed or contracted by SSP at any given time responsible for handling enquiries and complaints regarding the purpose, collection, use, access to or other aspects of the CCTV Monitoring Systems and Footage.

Private Place means any place where a person would have a reasonable expectation of privacy in which to conduct their personal affairs free from any surveillance, such as bathrooms or changing room facilities.

State Policy means SSP's CCTV policies incorporating State based laws and regulations applicable the specific Premises located in specific States across Australia.