



Ping Vehicle Leasing Ltd CCTV Policy

Last Review Date:	January 2026
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Version	Date	Changes
1.0	October 2023	<ul style="list-style-type: none">• Initial Document
2.0	January 2026	<ul style="list-style-type: none">• Updated to reflect changes by Data (Use and Access) Act 2025 (DUAA)



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About this policy

Ping Vehicle Leasing Ltd have installed CCTV systems on our premises for the of public and staff safety and crime prevention and detection; these are Recognised Legitimate Interests under the Data (Use and Access) Act 2025. This policy sets out why and how we process CCTV Data to ensure compliance with Data Protection Law. We record 24 hours per day, 7 days per week. These images are Personal Data and are subject to all applicable legislation and guidance, including:

- UK General Data Protection Regulation (“UK GDPR”)
- Data Protection Act 2018
- Data (Use and Access) Act 2025 (DUAA)

Ping Vehicle Leasing Ltd CCTV is registered as a 'data controller' with the Information Commission. This policy applies to all members of our workforce, visitors, and all other persons whose images may be captured by the system.

Why we use CCTV

Ping Vehicle Leasing Ltd uses CCTV where it is necessary for the following Recognised Legitimate Interests under the Data (Use and Access) Act 2025:

- **Crime Prevention & Public Safety:** To prevent or detect crime, protect our buildings and assets, and ensure the personal safety of our staff, guests, and the public.
- **Legal & Operational Requirements:** To assist in the apprehension and prosecution of offenders, provide evidence for civil legal actions, and monitor operational or safety-related incidents.
- **Claim Verification:** To assist with the verification of insurance or safety claims.

Monitoring

CCTV locations are selected to ensure monitoring is proportionate and limited to spaces relevant to our Recognised Legitimate Interests. Cameras are sited to capture only necessary images, ensuring that the privacy expectations of individuals are respected in accordance with the Data (Use and Access) Act 2025. Audio recording is strictly prohibited. Standard footage is retained for 31 days, after which it is automatically overwritten, unless required for an ongoing investigation. Monitoring and recording occur in the following areas:

- **Perimeters & Access:** Building perimeters, entrances, exits, and lobbies.
- **Internal Logistics:** Corridors, receiving areas for goods/services, and special storage areas.
- **Security Sensitive Zones:** Office locations and areas housing high-value assets.

How we operate CCTV

Where CCTV is in operation, we will ensure that clear and prominent signs are displayed to alert all individuals that their image may be recorded. In accordance with transparency standards, these signs will include:

- The identity of the data controller (Ping Vehicle Leasing Ltd).
- The purpose of the processing (Recognised Legitimate Interests).
- A QR code or web link providing direct access to this full CCTV Policy.



The system is operated in a professional, ethical, and legal manner. Access to live feeds is strictly limited to authorised personnel and the system is secured by industry-standard encryption and password protection. CCTV images will only be disclosed to law enforcement agencies or the Information Commission in line with the specific purposes of crime prevention, public safety, and legal compliance.

How we use the Data

To protect the rights of individuals, all CCTV Data is stored using secure encryption and access-control measures that maintain its integrity and prevent unauthorized access. In accordance with the Data (Use and Access) Act 2025, we strictly adhere to purpose limitation; CCTV Data will not be processed for any purpose other than those stated in this policy unless:

- It is for a compatible purpose (such as a direct legal requirement or public safety emergency).
- It is required by law enforcement or the Information Commission.
- We have a clear Recognised Legitimate Interest as defined by 2025 legislation.

Retention and Erasure of Data

CCTV Data is stored securely on our local system using industry-standard encryption to maintain its integrity. In accordance with the Data (Use and Access) Act 2025, we do not retain data for longer than is necessary for our Recognised Legitimate Interests.

- **Standard Retention:** Recorded images are kept for a maximum of 31 days, after which they are automatically overwritten and permanently deleted. This period is sufficient for most incidents to be identified and addressed.
- **Extended Retention:** Footage may be retained beyond 31 days only if it is required as evidence for an active investigation, a specific law enforcement request, or an ongoing legal claim. In such cases, the data will be securely deleted once the relevant process or legal limitation period has concluded.

All data is erased permanently and securely at the end of its useful life. Any physical media, such as hard drives or discs, will be disposed of as confidential waste using secure destruction methods to ensure data cannot be recovered.

Rights of Data Subjects

As CCTV Data identifies individuals, it is considered Personal Data under the UK GDPR, the Data Protection Act 2018, and the Data (Use and Access) Act 2025. Data Subjects have the following rights:

- **Right of Access:** Individuals can request a copy of their Personal Data and supplementary information, including the purpose of processing, categories of data, and intended retention periods.
- **Right to Rectification:** The right to have inaccurate or incomplete Personal Data corrected.
- **Right to Erasure:** The right to request that Personal Data be deleted when it is no longer necessary for its original purpose.
- **Right to Restriction:** The right to limit how we process your data in specific circumstances.



- **Right to Complain:** The right to lodge a complaint directly with Ping Vehicle Leasing Ltd or with the Information Commission.

How to Request Access to CCTV Footage

Individuals can request access to footage of themselves under the Right of Access (Subject Access Request). To process your request efficiently, please note the following procedures:

- **Information Required:** Requesters must provide sufficient information—such as the specific date, time, and location—to enable us to identify the relevant footage.
- **Proportionate Searches:** In accordance with the 2025 Act, we are required to conduct "reasonable and proportionate" searches. We are not obligated to carry out exhaustive searches that would impose a disproportionate burden.
- **"Stop the Clock" Provision:** While we aim to respond within 30 days, we may pause (stop) the response countdown if we require further information to verify your identity or clarify your request. The clock resumes once this information is received.
- **Third-Party Privacy:** To protect the rights of others, images of other individuals will be obscured before any footage is released.
- **Refusal of Requests:** We reserve the right to refuse requests that are "manifestly unfounded or excessive" or where disclosure would prejudice an ongoing investigation.

Requests of disclosure by third parties

As the Data Controller, Ping Vehicle Leasing Ltd maintains strict control over the disclosure of CCTV Data to third parties. Disclosure will only be permitted where it is necessary, proportionate, and consistent with the original purpose of the recording, as defined by the Data (Use and Access) Act 2025. CCTV footage may be disclosed or accessed in the following circumstances:

- **Law Enforcement:** To the police or other statutory prosecution authorities (e.g., Trading Standards) where it is necessary for the prevention or detection of a crime, or the apprehension and prosecution of offenders.
- **Legal Proceedings:** To legal representatives or insurance companies when the data is required for actual or genuinely anticipated legal proceedings (Litigation Privilege).
- **Public Safety & Emergencies:** When disclosure is necessary to protect the vital interests of an individual (e.g., a medical emergency) or to prevent serious anti-social behaviour.
- **Regulatory Requirements:** To the Information Commission in the event of a regulatory inquiry or audit.

Note on Third-Party Privacy: Before any footage is disclosed to a third party (other than law enforcement), we will ensure that the images of any other uninvolved individuals are redacted or obscured to protect their privacy rights. All disclosures are logged, documenting the reason for the request and the identity of the recipient.

Complaints

If you have a concern or complaint regarding how we handle your CCTV data, you have the right to raise this directly with us. We are committed to resolving your concerns fairly and transparently in



accordance with the Data (Use and Access) Act 2025. You must first raise a complaint with us directly. You can submit a complaint through any of the following channels:

- **Online Form:** https://www.pingvehicles.com/find_us
- **Email:** info@pingvehicles.com
- **Post:** Data Protection Officer, Ping Vehicle Leasing Ltd, Anchor Brook Business Park, Wharf Approach, Aldridge, Walsall, WS9 8BX.

What you can expect:

- **Acknowledgement:** We will acknowledge receipt of your complaint within 30 days.
- **Investigation:** We will investigate your concerns "without undue delay," keeping you informed of our progress.
- **Outcome:** We will provide a clear written outcome, explaining our findings and any remedial actions taken.

If you are not satisfied with our response, you have the right to escalate your complaint to the Information Commission (formerly the ICO). Please note that the Commission generally expects you to have attempted to resolve the issue with us first before they will intervene.