

Closed Circuit Television (CCTV) Policy

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

Table of Contents

1	Objective, Scope and Implementation	2
1.1	CCTV at SSP Premises	2
1.2	Application and Scope	2
1.3	Objectives.....	2
2	Essential Guidelines & Requirements	3
2.1	Monitored Areas	3
2.2	CCTV Installation.....	3
2.3	CCTV Operation	3
3	Collection and Storage of Footage	4
3.1	Collection and Storage of Footage.....	4
3.2	Access to Stored Footage.....	4
4	Use and Disclosure of CCTV Footage	5
4.1	Rights to Privacy.....	5
4.2	Disclosure of Footage.....	5
4.3	Footage and Data Security	5
4.4	Confidentiality	6
4.5	Request for Access to Footage.....	6
5	Signage and Notice	7
6	Complaints & Enquiries	7
7	Definitions	8

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 (**CCTV Policy** or **Policy**) applies to all employees, management, contractors, customers and any other visitors at each of SSP's Premises across Australia.

This CCTV Policy sets out the general framework for how SSP may use, install, operate and control CCTV cameras and Footage at each Location. As SSP's Premises are located across various States in Australia, different State laws may apply to each Location.

SSP will ensure compliance with the Australian Privacy Principles when or if personal information is collected, handled, stored and disclosed through the use of the CCTV camera monitoring system (**CCTV Monitoring System**).

Please refer to the relevant State Policies containing information relevant to specific Premises located in individual States. SSP's State Policies can be accessed via SSP Academy site and the SSP corporate website.

1.3 Objectives

SSP may install CCTV cameras at each 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 each of SSP's Premises across Australia;
- (b) to ensure that any conditions regarding CCTV as imposed under a liquor licence (if any) are complied with in accordance with the appropriate laws/standards;
- (c) to meet legal requirements and guidelines for the prevention of crime, public safety, public disorder and public nuisance across all Premises;
- (d) to provide an effective means by which to dissuade, reduce and prosecute crime across all 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 Premises;
- (f) to identify, respond to and assist in the factual, accurate and speedy reconstruction of the circumstances of incidents taking place at the 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 each Premises through effective monitoring policies;
- (i) to monitor crowd flow and behaviour at the Premises;
- (j) to protect SSP's property and other assets at the 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 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 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 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 CCTV Monitoring System will operate in real time on a continuous 24-hour basis, seven (7) days per week.
- (b) Where specifically designed as part of an awareness and deterrent measure, some monitors may be made available at some Premises to display certain CCTV images to employees and visitors within indicated publicly accessible areas (**Public Monitors**).

- (c) 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.
- (d) 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 of Footage

CCTV images captured and recorded at the 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 per legislative requirements in each State or as otherwise specified by the Australian Standards (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 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, any applicable State Policies, and any other relevant legislation.
- (d) A minimum of one Authorised Personnel will have the capability to access stored Footage at the 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 Premises and that the employee will be 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 Premises by Authorised Officers until permitted or required to dispose of the Footage under applicable Federal or State 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 Footage unless the disclosure 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 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 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 where 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 *Privacy Act 1988* (Cth) and other applicable Australian Privacy Principles.

4.5.3 Customer and visitor requests

Request for access to Footage by customer and other visitors to the 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 Australian Standards and any applicable Federal and State 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 will be actioned within ten (10) business days of receipt (unless exceptional circumstances apply).

5 Signage and Notice

- 5.1 Appropriate signage will be displayed at all Premises alerting employees, customers and other visitors to the Premises that CCTV cameras are in operation at the 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 Premises;
 - (b) displayed at all entrances/access points to the 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 Premises will be informed of the installation of CCTV Monitoring Systems at the Premises upon commencement of employment with SSP to ensure each employee is aware:
 - (a) they are being recorded and monitored whilst on the Premises; and
 - (b) the Footage captured by the CCTV Monitoring System may be used for purposes pertaining to their employment as set out in this Policy.
- 5.4 The use of CCTV at the Premises will comply with:
 - (a) this CCTV Policy;
 - (b) any relevant State Policy; and
 - (c) any applicable State based surveillance laws and regulations pertaining to this CCTV Policy and any State Policies.

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 SSP's Premises will be considered and addressed by SSP in accordance with the *Privacy Act 1988* (Cth).

7 Definitions

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

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.

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 a law enforcement agency or other relevant local, government or other authority.

CCTV or Close 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 Premises.

Location means the location of each Premises.

Policy or CCTV Policy means this national 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.