

# GDPR CCTV Surveillance

## Policy Statement



**DANX  
Carousel**



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## 1. Introduction

The DANX Carousel Group of companies (hereafter “The Group,” “We,” “Our”) is a time critical service logistics and supply chain specialist with strong positions in the UK, EU – Ireland, Benelux, DACH, Iberia, Nordics, Baltics, and Poland and EEA – Norway. The Group consists of DANX, DANX ILS, UT, TBS, FOMAB, TLS Group, LPR Group, Carousel, Alltrans and Logik.

The Group is a comprehensive partner for logistics and supply chain services such as time-critical spare parts distribution, warehousing, final mile, linehaul, battery logistics, customs clearance, and more.

## 2. Purpose

This policy outlines the lawful, transparent, and secure use of Closed-Circuit Television (CCTV)/Video Surveillance systems across the Group, to protect sites and property, ensure safety, and prevent crime, while respecting individuals' privacy rights under the UK GDPR, EU GDPR, EEA under International and national laws.

## 3. Scope

This policy applies to all CCTV systems/Video surveillance systems operated by the organisation across the UK, EU, and EEA countries, and covers all employees, visitors, partners, contractors, and the public.

The use of camera systems is designed to prevent, detect and then document any security incident that occurs in the buildings and surrounding area (i.e. to the fence of our premises at each site) occupied by the Group. The term “security incident” refers to wrongdoing in the form of intrusion, theft, unauthorised access, break-ins, vandalism, assaults, threats and arson. The cameras will furthermore be used for documentation in case of a work-related accident and to locate missing shipments.

## 4. Legal basis for processing

Under Article 6 of the GDPR, we rely on Legitimate Interests (e.g. crime prevention, safety, access control) as the primary lawful basis for processing CCTV/Video Surveillance data.

## 5. Transparency and signage

Clear signage is placed at all CCTV/Video Surveillance-monitored areas, and by exception the purpose of surveillance, contact details of the data controller, and a link to the privacy notice. Employees and visitors to the sites will be informed via our privacy policies (which are available on our websites) and via our employee and onboarding materials.

## 6. Data minimisation

Only areas necessary for the stated purpose will be monitored. No surveillance is allowed in private areas such as restrooms or break rooms. Hidden cameras must only be used when legally justified.

Under no circumstance is CCTV surveillance used to monitor the legitimate activities of employees, service providers or visitors, including the hours they keep, checks on quality of work or productivity levels.

## 7. Data protection impact assessment

A DPIA will be carried out ahead of installation if surveillance is systematic or extensive, involves employee monitoring, or covers sensitive areas.

## 8. Surveillance system access

Access to the data contained within the surveillance equipment is limited to the internal IT infrastructure department (strictly controlled by the Head of IT Infrastructure), relevant third-party providers (for the technical maintenance of the systems) and operational management for each site (for the prevention and detection of safety, crime prevention and access control).

Those with access are not permitted to view, download or send the material to any external parties except if asked by the police/other authorities to deliver evidence in relation to a legal event.

Footage is stored on encrypted systems with role-based access controls and held in secure physical environments if applicable. It is forbidden to take video footage on a mobile device from the original footage, unless access to the footage is via the mobile device.

## 9. Operation, retention and storage

Surveillance equipment stores all movements in the areas that they monitor 24 hours per day and 7 days a week. Footage will be retained only for as long as necessary, typically 30 days for general surveillance, or longer if required for investigations or legal claims. Where appropriate for external CCTV facing equipment ring fencing/blurring is in place.

## 10. Data Subject Rights (DSR)

Individuals have the right to request access to footage in which they appear, request erasure where applicable, and object to processing in certain cases. However, this right must be strictly limited by the protection of the personal data of third parties who also appear in these images. Corrections can only be made to erase the images in question. This may be done following any legitimate request through a Data Subject Request to erase images that do not constitute objective evidence in the event of an offence. This can be done by contacting the Group Data Controller Officer by email on [gdpr@danxcarousel.com](mailto:gdpr@danxcarousel.com), further details are contained within the Data Subject Rights Policy.

Any concerns or complaints relating to the use of CCTV can be raised in writing to [gdpr@danxcarousel.com](mailto:gdpr@danxcarousel.com). Response times are detailed in the Data Subject Rights Policy and Procedure documents and include escalation routes and how to lodge a complaint with the relevant supervisory authority.

## 11. Governance and review

This policy will be reviewed annually or as required by changes in legislation.

## 12. Adoption of policy

The DANX Carousel Group's CCTV Surveillance Policy statement was adopted and approved by the GDPR Executive Team Sponsor on 13<sup>th</sup> November 2025.

### **Review and revision of this policy**

This policy will be reviewed and revised annually for compliance to the policy content or as required if changes to legislation apply sooner.

### **Contact**

If you have any questions relating to the content of this privacy notice, please direct them to [gdpr@danxcarousel.com](mailto:gdpr@danxcarousel.com)