



Author	Julie McCarthy
Approved by	Georgia Woodley
Date Created	July 26
Document Reference	ESSL-DP-POL-011
Version	1

Contents

1. Purpose	1
2. Scope	2
3. Data Controller Contact Details	2
4. Lawful Basis for Processing	2
5. Purposes for Using Vehicle CCTV	2
6. Data Sharing	3
7. International Transfers	3
8. Retention	3
9. Security Measures	3
10. Individual Rights	3
11. Signage and Fair Processing	4
12. Governance, DPIA and Monitoring	4
13. Complaints	4
14. Vehicle Signage	4

1. Purpose

- 1.1 ESSL operates vehicle-mounted CCTV to support the safety, security and vehicle management, protecting employees, other road users, and the public. This policy explains how we collect, use, store and protect personal data captured by vehicle CCTV in line with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.
- 1.2 Our CCTV system includes *only* vehicle-mounted exterior cameras (e.g., front, rear, and side).
- 1.3 We do not record audio, and we do not use in-cab or driver-facing cameras.

2. Scope

- 2.1 This policy applies to all vehicle CCTV installed in ESSL vehicles.
- 2.2 The system may capture:
- Video of public roads, vehicles, number plates, surroundings and road users
 - Images of drivers, passengers and pedestrians
 - Vehicle metadata (e.g., date/time, system status)
- 2.3 **No audio** is captured, and **no internal driver-facing imagery** is recorded.

3. Data Controller Contact Details

Data Controller: East Suffolk Services Ltd / Fleet Clear (Supplier)
Contact: Risk and Compliance / Customer Services @ Fleet Clear
Email: support@fleetclear.com (System) & riskandcompliance@company.co.uk (ESSL)
Postal Address: East Suffolk Services Ltd, Riverside, 4 Canning Road, Lowestoft NR33 0EQ

4. Lawful Basis for Processing

- 4.1 We process vehicle CCTV data under:
- **Legitimate Interests** (Article 6(1)(f)):
To promote safety, protect assets, and investigate incidents.
 - **Legal Obligation** (Article 6(1)(c)):
To comply with lawful requests from police, regulators or courts.
 - **Vital Interests** (Article 6(1)(d)):
Where the data may help protect someone's life (serious accidents, emergencies).

5. Purposes for Using Vehicle CCTV

- 5.1 We use footage for:
- Accident and incident investigation
 - Disciplinary Investigations
 - Protecting employees and the public
 - Insurance and claims handling
 - Preventing and detecting crime and fraud
 - Supporting police and statutory bodies when legally required
 - Training and improving safety practices (visual footage only)
- 5.2 Footage is not used for routine employee performance monitoring, and is never used covertly.

6. Data Sharing

- 6.1 Footage may be shared **only when necessary**, with:
- Insurers and legal representatives
 - Police, emergency services or regulators (on lawful request)
 - Vehicle CCTV/telematics service providers acting as data processors
 - Other third parties where required to establish, exercise or defend legal claims
- 6.2 ESSL ensures all processors meet UK GDPR requirements before any data is shared.

7. International Transfers

- 7.1 If data is ever transferred outside the UK (e.g., via a future cloud provider), ESSL will ensure appropriate safeguards are in place, such as:
- The UK International Data Transfer Agreement (IDTA)
 - Adequacy decisions
 - Appropriate contractual protections
- 7.2 Currently, no intentional international transfers take place.

8. Retention

- 8.1 Routine CCTV footage: retained for 28 days
- 8.2 Footage relating to incidents or investigations: retained until the investigation or claim is closed
- 8.3 In some cases, footage may be retained for up to 6 years where required for legal claims or statutory purposes
- 8.4 After the retention period expires, footage is securely deleted.

9. Security Measures

- 9.1 We apply appropriate technical and organisational measures to ensure CCTV data is protected, including:
- Secure platform access with role-based permissions
 - Encryption at rest and in transit (where supported by vendor)
 - Secure evidence export procedures
 - Audit logs monitoring access and downloads
 - Staff training regarding data protection and CCTV use

10. Individual Rights

- 10.1 Individuals captured by vehicle CCTV have the right to request:
- Access to their personal data (Subject Access Request)

- Erasure (in certain circumstances)
- Restriction or objection to processing
- Correction of inaccurate information
- Right to lodge a complaint with the ICO

Requests should be directed to:

Risk and Compliance

Email: RiskCompliance@eastsuffolkservices.co.uk

10.2 We may need additional information (e.g., date, time, location) to identify relevant footage, and we may need to redact third-party images.

11. Signage and Fair Processing

- 11.1 All vehicles display clear **CCTV in Operation** signage.
- 11.2 Because cameras face only externally and do not record audio, the privacy impact on individuals is low and proportionate to our legitimate aims.

12. Governance, DPIA and Monitoring

- 12.1 A Data Protection Impact Assessment (DPIA) has been completed for the operation of vehicle CCTV.
- 12.2 This policy and the DPIA are reviewed annually or upon significant change, such as:
- Changing CCTV providers
 - Adding new camera types
 - Introducing audio or in-cab monitoring (not currently used)

13. Complaints

13.1 If you have concerns about how CCTV footage is handled, please contact:

Risk and Compliance

Email: RiskCompliance@eastsuffolkservices.co.uk

13.2 If you remain unhappy, you may contact the **Information Commissioner's Office (ICO)** at www.ico.org.uk.

14. Vehicle Signage

CCTV In Operation

This vehicle is fitted with CCTV. Images are being recorded for the purpose of safety and vehicle management.

Controller: East Suffolk Services Ltd.

Contact: Risk and Compliance - RiskCompliance@eastsuffolkservices.co.uk

Footage retained for 28 days unless required longer for claims.



Version History			
Date	Version Number	Name	Change description
03.08.2026	V2	Georgia Woodley	Formatting / Finalisation