

## CCTV POLICY

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POLICY SUMMARY	
Policy owner	Group Risk Manager
Last review date	April 2025
Next review date	April 2026

### 1. OWNER

CCTV systems are either owned and operated by Grindrod or are owned or operated by third parties on behalf of Grindrod. The contact details of third party owners and operators can be obtained on request using the request procedure set out in section 6 below.

The owners and operators have the following responsibilities:

- Ensure that the use of CCTV systems are implemented in accordance with this policy
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes
- Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy
- Maintain a record of access (e.g. an access log) to, or the release of, images or any material recorded or stored in the system
- Ensure that adequate signage at appropriate and prominent locations is displayed.
- Ensure that monitoring images are stored in a secure place with access by authorised personnel only
- Ensure that images recorded on tapes / DVDs / digital recordings are not stored for longer than required and are then erased unless required as part of a criminal investigation or court proceedings (criminal or civil) or other bona fide use as approved by the Information Officer
- Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics

### 2. PURPOSE OF CCTV SYSTEMS

CCTV systems have been installed by Grindrod with the primary purpose of reducing the threat of crime generally, protecting Grindrod's premises and helping to ensure the safety of all Grindrod's staff, customers and visitors consistent with respect for the individuals' privacy. The systems will not be used to provide recorded images for the world-wide-web nor for any automated decision taking.

### 3. LEGAL CONTEXT FOR THE CCTV SYSTEM

Grindrod is committed to compliance with the Protection of Personal Information Act 4 of 2013 (POPI Act). As such, this policy addresses the following specific requirements of the POPI Act:

- Condition 1: Accountability. The owner or the operator is accountable for lawful processing of personal information in the use of the CCTV system
- Condition 2: Lawfulness of processing and Minimality. The owner or the operator will ensure these conditions are met
- Condition 2: Consent. The use of the CCTV system is in accordance with of section 11(f), “legitimate interests of the responsible party”. Specifically these interests are to protect personal safety when on our premises; investigate, detect or prevent crime and to apprehend or prosecute offenders
- Condition 3: Specific purpose. As detailed under Condition 2 the specific purposes are the reducing the threat of crime generally, protecting Grindrod’s premises and helping to ensure the safety of all Grindrod’s staff, customers and visitors, consistent with respect for the individuals’ privacy
- Condition 3: Retention of records. CCTV images will be retained for a period adequate to fulfil the purposes specified. After this period the CCTV images will be electronically deleted
- Condition 4: Further processing limitation. CCTV images captured by the system may be further processed in accordance with section 15(3)(c)(iii), conduct of proceedings in any court. This may also require the retention period be increased for this further processing purpose
- Condition 6: Openness. Data subjects have the right to request access to the CCTV images using the Grindrod request process. Notification to data subject. Signage will be implemented to comply with section 18 of the POPI Act
- Condition 7: Security safeguards. The Owner will ensure compliance with sections 19 to 22 of the POPI Act
- Condition 8: Data subject participation. The Grindrod data subject access request process will be used

The owner or the operator will ensure that in all other respects, Grindrod will comply with the requirements of the Protection of Personal Information Act (“POPI”) Act through an annual review of the CCTV system with the Grindrod Information Officer.

## 4. ACCESS TO IMAGES

Access to images should be recorded in the Access Log and be restricted to those staff who need to have access in accordance with the purposes of the system.

### 4.1 Access to images by third parties

Disclosure of recorded material will only be made to third parties in strict accordance with the purposes of the system and is limited to the following authorities:

- Law enforcement agencies where images recorded would assist in a criminal enquiry and / or the prevention of terrorism and disorder
- Prosecution agencies
- Relevant legal representatives
- The media where the assistance of the general public is required in the identification of a victim of crime or the identification of a perpetrator of a crime
- People whose images have been recorded and retained unless disclosure to the individual would prejudice criminal enquiries or criminal proceedings
- Emergency services in connection with the investigation of an accident

## 4.2 Access to images by a subject

CCTV digital images, if they show a recognisable person, are personal data and are covered by the POPI Act. Anyone who believes that they have been filmed by CCTV is entitled to ask for a copy of the data, subject to exemptions contained in the Act. They do not have the right of instant access.

A person whose image has been recorded and retained and who wishes access to the data must apply in writing to Grindrod's Information Officer. Subject Access Request Forms are obtainable from Andrew Davies (andrew.davies@grindrod.com). The POPI Act gives the Information Officer the right to refuse a request for a copy of the data particularly where such access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders. If it is decided that a data subject access request is to be refused, the reasons will be fully documented and the data subject informed in writing, stating the reasons.

## 5. REQUEST TO PREVENT PROCESSING

An individual has the right to request a prevention of processing where this is likely to cause substantial and unwarranted damage or distress to that or another individual.

All such requests should be addressed in the first instance to Andrew D Davies (andrew.davies@grindrod.com), who will provide a written response within 10 business days of receiving the request setting out the decision on the request. A copy of the request and response will be retained.

## 6. COMPLAINTS AND REQUESTS

It is recognised that members of Grindrod and others may have concerns or complaints about the operation of the system. Any complaint should be addressed in the first instance to Andrew Davies (andrew.davies@grindrod.com).

## 7. MONITORING OF THE SYSTEMS

The effectiveness of the CCTV system and all documented procedures will be kept under review and a report periodically made to the Grindrod Executive committee. This will happen at least once per calendar year.

## 8. POPIA

The right to privacy is an integral human right recognised and protected in the South African Constitution and in the Protection of Personal Information Act 4 of 2013 ("POPIA"). Grindrod is committed to compliance with POPIA and other applicable legislation, protecting the privacy of data subjects and ensuring that their personal information is used appropriately, transparently and securely.

## 9. REVIEW HISTORY

This policy will be reviewed at least annually and changes to the policy will be submitted to the Executive and Social, Ethics and Sustainability committees for approval.

	NAME	DESIGNATION	DATE
Reviewed	Andrew Davies	Group Risk Manager	April 2025
Approved	Executive committee	Executive committee	July 2021
Reviewed	Andrew Davies	Group Risk Manager	June 2021
Compiled	Vicky Commaile	Group Company Secretary	June 2021