

CCTV POLICY

This policy governs the collection, use and disclosure of images captured by CCTV cameras operated by ANZCO Foods Limited and other members of the ANZCO group (together ANZCO or we, us, our).

CCTV refers to surveillance devices that capture images or videos of people and activity, and includes other surveillance devices of the same or similar nature.

This CCTV policy provides information on:

- our use of CCTV cameras and footage; and
- where personal information has been collected, individuals' rights in relation to that information.

This CCTV policy should be read in conjunction with ANZCO's applicable privacy policy (*Privacy Policy*), which sets out generally how ANZCO deals with personal information it collects (see the Privacy Policy section below). Nothing in this CCTV policy limits or excludes individuals' rights under the Privacy Act 2020 (the *Act*).

Personal information is any information about an individual that allows an individual to be identified.

1. CCTV camera locations / recording

Our CCTV cameras are located and positioned to observe public spaces and privately owned spaces but will not unreasonably intrude on a person's privacy. Cameras will be located at various places on our sites, and may be relocated from time to time.

CCTV may cover (but is not limited to):

- entry and exit points for ANZCO premises
- general circulation/corridors/hallways
- areas where cash, high value equipment, and high value information are stored or handled
- areas where staff interact with processes that have customer requirements for footage to be kept for animal welfare purposes
- areas with high risk equipment, processes, or chemicals e.g. stores, labs, engineering areas
- car parks, bike racks and lockers used for storing personal effects

Other than for installations approved under clause 4, signage advising that cameras are in operation is installed at appropriate locations to ensure as far as reasonably possible that users of an area are aware that they may be captured on CCTV footage.

Our CCTV cameras may be relocated from time to time. CCTV cameras will not be positioned in private locations where we think individuals have a reasonable expectation of privacy such as bathrooms or changing rooms.

CCTV cameras operate up to 24 hours a day, seven days a week and may also be monitored in real time in accordance with the provisions of this policy. Footage collected via CCTV will be stored securely for up to 90 days (based on available storage space) at which time footage will be automatically overwritten. Footage will only be retained for longer than 90 days if needed for evidential purposes or to meet our customers' requirements. Downloaded recordings will be retained for so long as is reasonably required for purposes consistent with this policy.

2. Information collected

Our CCTV cameras will record footage of individuals as they pass through the CCTV camera coverage areas. This footage will often be personal information about those individuals and will in that case be managed as set out in this CCTV policy and our Privacy Policy, and in accordance with the Act.

3. Purpose of collection

ANZCO has installed CCTV cameras to:

- help protect the security of:
 - our employees, contractors and visitors to our premises
 - our property and premises and critical infrastructure, and the property of our employees, contractors and visitors
- help ensure the health and safety of our employees, contractors and visitors to our premises
- detect and deter inappropriate or criminal behaviour and investigate theft or damage to property or any alleged inappropriate or criminal behaviour
- meet our customers' requirements relating to animal welfare, health and safety and food safety or any other requirements

4. Temporary/covert camera installations

Where the Privacy Officer thinks it is necessary in accordance with this clause 4 the Privacy Officer may authorise temporary and/or covert camera installations on, and is able to view activity on, an ANZCO site.

The Privacy Officer may authorise a temporary and/or covert camera installation on, and is able to view activity on, an ANZCO site where ANZCO has reasonable grounds to suspect theft, removal of property without authorisation and/or some other potential criminal activity is occurring on that site. Such measures will be taken only where justifiable under relevant privacy laws and where the Privacy Officer believes the use of a temporary and/or covert camera installation is appropriate having regard to the seriousness of the issues and availability of other measures to address them. Cameras are to be removed immediately upon conclusion of any investigation.

All approved temporary/covert camera installations must be coordinated through the Group Technology function on all ANZCO sites.

5. Use and disclosure of the footage collected

ANZCO may use the footage captured by CCTV cameras:

- to investigate an incident or complaint

- when conducting internal investigations
- in aiding authorities with investigations
- as otherwise required or permitted by law
- for the purposes of a customer audit or reporting or to assess or demonstrate compliance with any requirements of customers
- for the purposes of health and safety

In the event any unlawful or suspected unlawful activity is captured on our CCTV cameras, we may pass that footage over to the Police (or other third parties assisting in an investigation) for the purpose of the investigation. This footage may be used, when necessary, for court or tribunal proceedings.

We may also disclose footage to other authorities or agencies where required by law (e.g. the Office of the Privacy Commissioner, WorkSafe or the Ministry For Primary Industries).

Stored footage can only be accessed by authorised ANZCO personnel.

6. Individuals' rights to access and correct information

Aside from some circumstances set out in the Act, you have a right to access and correct any footage containing images of you which is captured by our CCTV cameras. As footage is only retained for up to 90 days there is no guarantee the footage requested will still be held at the time you make your request for access.

In responding to any requests to access footage, ANZCO must also consider the need to protect other people's privacy. If a request for a copy of the footage is unable to be granted without unreasonably breaching others' privacy in our view, a written description may be provided of activities in the footage requested or a viewing of the footage may be arranged.

To request access to such footage, please mail or email our Privacy Officer at the following address or email address:

ANZCO Foods Limited
PO Box 39145
Harewood
Christchurch 8545

Email: dataprotectionofficer@anzcofoods.com

7. Privacy Policy

ANZCO's privacy policies set out generally how ANZCO holds, uses and discloses personal information it collects and should be read in conjunction with this CCTV policy in relation to any personal information captured by our CCTV cameras.

If you are an employee or contractor of ANZCO, our internal privacy policy (available on our intranet) will apply to you.

For any other individuals, our privacy policy (available at <https://anzcofoods.com/privacy-policy/>) will apply to you.

8. Complaints

- Complaints regarding any aspect of the operation of CCTV cameras by ANZCO including any complaint arising under this policy may be made to the Privacy Officer. Complaints shall be investigated through such process as the Privacy Officer is satisfied provides the complainant a full and fair opportunity to advance their concerns while having matters determined in a timely manner.
- Nothing shall limit any person's right to pursue a complaint under ANZCO Policy or to the Privacy Commissioner.

9. Changes to our CCTV policy

We may change this policy at any time and notify you by posting an updated version of the policy on our intranet. Any change applies from the date we post it on our intranet.

Updated June 2023.