

CLOSED CIRCUIT TELEVISION SURVEILLANCE FOOTAGE DISCLOSURE POLICY

Counsel's Chambers Ltd ABN 72 000 111 302 (collectively CCL, "we", "us" or "our") owns and operates a number of closed circuit television (CCTV) surveillance cameras. In addition, CCL operates and maintains CCTV surveillance cameras which have been acquired by a number of individual member floors independently of CCL. CCL uses CCTV footage it collects in connection with the management and surveillance of the common areas and surrounds of the buildings in which members, tenants and the offices of CCL are located.

In particular, all CCTV cameras operated by CCL are located at entrance points to the buildings it manages and/or owns and in public places such as lifts, lift foyers and plant room spaces within those buildings, including on floors within those buildings.

All footage recorded by all of the CCTV cameras operated by CCL is stored and managed by CCL.

CCL monitors the activities of occupants, employees, visitors, contractors and other persons within the range of each of the respective CCTV cameras and collects information from these CCTV cameras for a number of reasons including:

- (a) safety of occupants, visitors, contractors and other persons in the buildings in which the CCTV cameras are located;
- (b) responding to incidents within and nearby to our premises;
- (c) assisting with the clarification of legal liability in the case of a legal action;
- (d) preventing or reducing theft and damage to property; and,
- (e) allaying public concern about safety.

CCL stores all information collected by these CCTV cameras in accordance with its [Privacy Policy](#). This policy is intended to complement CCL's Privacy Policy and specifically identify how CCL will deal with requests for the release of CCTV footage held by CCL as a consequence of it operating the CCTV cameras.

RETENTION OF CCTV FOOTAGE

CCL will retain CCTV footage it collects for a period of 31 days after collection, after which it may be destroyed by CCL at its absolute discretion.

DISCLOSURE OF CCTV FOOTAGE

CCTV footage/data is collected for the purposes identified above.

Disclosure to staff, members and third parties for reasons which do not come within the objects as disclosed in this policy is not permissible.

The disclosure of footage of persons who pose a security risk to members, tenants and staff, as a warning to be aware of those persons, is one of the primary objects of undertaking the surveillance activities as disclosed in this CCTV policy and for this reason is permissible without consent of such persons.

Otherwise CCL will only disclose CCTV footage in which individuals are readily identifiable in limited circumstances where the privacy of the individuals identified in the footage will not be unreasonably compromised and only in accordance with CCL's obligations under the Privacy Act 1988 (Cth) as amended from time to time (as well as any other legislation intended to protect the privacy of individuals).

As such, CCL will disclose information to third parties in circumstances where:

- All the individuals identified in the footage consent in writing to its disclosure and the disclosure is permitted by law; or
- The disclosure is required by law, including pursuant to compulsory procedures for production.

CCL may also disclose CCTV footage to third parties in circumstances where:

- CCL believes that there has been unlawful activity or misconduct of a serious nature and that the disclosure will allow appropriate action to be taken in relation to the matter.
- CCL believes that the disclosure is reasonably necessary to lessen or prevent a serious threat to the life, health or safety of any individual or to public health or safety.
- CCL believes that the disclosure is reasonably necessary to assist in the location of a person who has been reported missing.

All requests for the disclosure of CCTV footage must be provided to the General Manager in writing. The General Manager only will be responsible for the disclosure of CCTV footage.

Access to the CCTV systems and footage is for authorised staff and contractors only. For security the system is password protected. All other access will be in accordance with this Policy.

DE-IDENTIFYING CCTV FOOTAGE TO BE DISCLOSED

CCL understands that privacy is an important individual right. As such, when CCL is required or decides to disclose CCTV footage in accordance with its Privacy Policy and this Policy, CCL will only do so after taking steps such as pixelating the faces or otherwise removing or obscuring the images of all individuals from that footage who it is not reasonably necessary to identify. CCL will not release footage in which individuals are readily identifiable, where it is not practicable for CCL to de-identify the images of those individuals.

CCL

CCL may incur expense in the process of responding to a valid request to disclose CCTV footage, including the cost of de-identifying CCTV footage to protect the privacy of individuals in accordance with

this Policy and its Privacy Policy. CCL will, at its discretion, require payment of this expense by any person entitled to request for disclosure of CCTV footage, at any time prior to incurring the expense.

RELEASE

CCL may request that a person with a valid request for the disclosure of CCTV footage execute, prior to the release of that footage, a signed Deed of Release confirming clearly the purpose for which the CCTV footage will be used and setting out the limits of its use.

ACCESS TO PERSONAL INFORMATION

You have a right to reasonable access to any information that CCL holds about you where it is practicable and reasonable for CCL to provide that information. To request access to your information, please contact our General Manager, Debbie George, where it is practicable for CCL to provide that information by email, at dgeorge@counselschambers.com.au. At the time you make your request, CCL may ask you to provide a written request detailing the information you are seeking to access and, if you are an authorised representative, to provide documented evidence that lawfully authorises you to act on the individual or company's behalf.

CCL reserves the right to charge for providing access to certain footage, as permitted by law, and you will be informed of this at the time of your request. CCL will always endeavour to process your request for access within a reasonable timeframe and in the manner requested by you, if it is reasonable and practicable to do so. Agreeing to pay CCL's costs to provide you with access to certain footage will not automatically entitle you to access to that footage.

In some circumstances CCL may decline a request for access to information. If CCL is unable to give you access to the information you have requested, CCL will give you written reasons for this decision.

CONTACTING US / COMPLAINTS

If you have any questions, feedback or concerns about this Policy, or how your personal information is handled by CCL or how your request for the disclosure of CCTV is handled by CCL, please see our CCTV Footage Disclosure Handling of Complaints Policy and please contact our General Manager as follows:

Counsels Chambers Ltd

Address: Level 1, Selborne Chambers, 174 Phillip Street, Sydney, NSW, 2000

Post: Level 1, Selborne Chambers, 174 Phillip Street, Sydney, NSW, 2000

Phone: 02 9231 3644

Facsimile: 02 9235 3783

Email: dgeorge@counselschambers.com.au

CCL will attend to your query or complaint within a reasonable timeframe. If you have a complaint or have made a complaint and you are not satisfied with our response or consider that the complaint has not been adequately resolved, then you may make a formal written complaint to the Office of Australian Information Commissioner.