PAMAC
Banking on our Credentials

Closed Circuit Television (CCTV) System Policy & Guidelines

First Document Release Date: 27 March 2021

Title	PAMAC CCTV Policy
Classification	Internal Use Only
Author	ISMS Manager
Reviewer (suitability and adequacy)	AVP- Admin dept.
Approver (suitability and adequacy)	CEO
Policy/Document Owner	Administration Dept.
Current Version	1.0
Last Review Date	26.11.2024

Modification History:

S. No.	Description of Change	Date of Change	Version No.
1	Policy reviewed no changes done	06.10.2021	0.1
2	Policy reviewed no changes done	12.10.2022	0.1
3	Change in escalation Matrix – removed Ajit name.	26.02.2024	0.2
4	Align purpose according to the IT ACT, added scope of the location, added location, added signage according to the law, added retention and backup, added security measures	25.11.2024	1.0

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Closed Circuit Television (CCTV) System Policy & Guidelines

1 Purpose

This Policy seeks to ensure that the Close Circuit Television (CCTV) system used at PAMAC is operated in compliance with the Surveillance Law in India and according to the IT ACT 2000.

PAMAC seeks to ensure, as far as is reasonably practicable, the security and safety of all PAMACians, visitors, contractors, its property and premises.

The primary purpose of CCTV at PAMAC is for the safety and security of PAMACians and visitors.

PAMAC therefore deploys CCTV to:

- Promote the safety and security of PAMAC premises
- Assist in the prevention, Monitoring, investigation and detection of unauthorized activities within PAMAC
- Assist in the investigation of breaches of PAMACs codes of conduct and policies by PAMACian, contractors and where relevant and appropriate investigating complaints.

2 Scope

This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of recording.

Policy governing the location or unit where CCTV surveillance is in place.

3 Location of Cameras

Location wise CCTV Inventory records are maintained and is available with central admin team.

4 Signage

In compliance with the Lawfulness, Fairness and Transparency Principle

Signage includes details relating to:

Identity: i.e., informing you that the PAMAC is recording your image

Contact Details: Contact number and concerned person of PAMAC

Signage notification and contact details are placed in all Units inside the entry of the office and near reception area.

5 Retention Period and Backup

The recording of CCTV system is retained for minimum 30 calendar days / as per the capacity of device or as per the client requirement.

6 Responsibilities

- The Physical environmental security – **Admin dept**. is authorized to oversee and coordinate the use of CCTV monitoring for safety and security purposes at PAMAC.

- **All locations DCH in PAMAC** using CCTV are responsible for implementing these guidelines in their respective operations.

- **ADMIN team has primary responsibility** for assisting to installation of CCTV in all location

- **Admin team is responsible** for monitoring and maintaining the record of CCTV recording, maintaining incident record document / sheet such as CCTV cameras not working, CCTV HDD failure etc. and the maintaining the CCTV record.

- For geographic location – **respective IT / HR personnel is responsible** for maintaining the CCTV incident record in case of hardware failure or camera not working or CCTV backup is not happen on daily basis.

7 Security Measures:

Access and Requests for Information

- Access to, and disclosure of CCTV footages / recordings to third parties is strictly controlled. This is to ensure that the rights of the individual(s) are maintained, and that the chain of evidence remains intact should the CCTV images be required for evidential purposes.

- Only Admin team and IT personnel have an access to the CCTV cameras
- For Geographic location – respective DCH and IT person have access of the CCTV cameras for their location.
- Camera operators will monitor based on suspicious behavior. Camera operators will not monitor individuals based on characteristics of race, gender, ethnicity, sexual orientation, disability, or other classifications.

8 Disclosure of CCTV Footages

An appropriate to disclose surveillance information to a law enforcement agency (e.g. Police, external auditor) when the purpose of the system is to prevent and detect crime or to cross verification of the process.

The following information will be retained by PAMAC where access to CCTV recording by our CCTV systems is provided.

- **Reason for disclosure.**
- **Details of the recording disclosed** (i.e., the date, time, and location of the recording).

- Only ADMIN dept. may retrieve CCTV recordings, for the purpose of investigating possible criminal activity or misconduct.

9 Procedure

- PAMAC follows the below process with respect to CCTV Maintenance (format for record maintenance

No.	Activity	Frequency	Records	Review Frequency	Action
1	Maintain the location wise list of cameras available	-	Location wise Tracker of cameras available	Monthly basis	Addition / deletion of records if any
2	Check whether camera are working (Live and recording)	Daily	Daily check tracker	Daily	Escalation to respective team if camera is not working and action to ensure it's working properly
3	Sample check the of the recordings and track if any security incident	Fortnight	Tracker of the incident if any	Fortnight	Escalation to respective team for the action and share the incident tracker to ISMS team

10 Escalation Matrix

#	Authorized Name	Designation	email	contact no
1	Mangesh Hande	Head Admin	mangesh.hande@pamac.com	9867718564
2	Ganesh Sawant	DVP – IT & ISMS	ganesh.sawant@pamac.com	9321388654

11 Review

This policy will review annually and if any changes happen in the process

12 Approvals

Any change in the above process need to approve by the CEO.

ANNEXURE

PAMAC central admin maintained the records in below format

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Sr #	Location	Branch	Camera #	Date of Review	Camera Working Yes / No	Last recording date	Review of the last recording	Any notice Suspicious	Name of the reviewer