



JOE & THE JUICE - CCTV RESPONSIBILITIES

The purpose of this document is to define and communicate to employees the roles & responsibilities for the following:

- Installation & moving of CCTV in stores
- Access requests for CCTV footage
- Storage & sharing of CCTV footage
- Maintenance of CCTV

It should be read together with JOE & THE JUICE's CCTV Policy & must be signed by all employees who require access to CCTV footage for any reason.

All markets must utilise only Ubiquiti Unifi CCTV cameras (note: this does not include existing Verkada cameras in the US and the UK). Any markets utilising non-IT approved CCTV hardware & software **must** consult IT to change to Ubiquiti.

If Verkada systems are being utilised, it is important to note that blurring of individuals must be undertaken at the time the footage is saved (to remove any individuals not relevant to the purpose of saving the footage beyond the retention period – i.e. – for the purposes of investigations etc.).

A responsibilities matrix can be found at Appendix A.

Installation of CCTV in stores

The positioning of CCTV in new & existing stores must be at the direction of the Director of Operations for that market (excluding the UK where it is the Senior Manager of Compliance and Safety). This can be done in collaboration with the Director of HR if CCTV is required for reasons related to employees and the Head of Facilities if the CCTV is required in relation to contractor work. Group Legal & Compliance are available to provide advice if needed. It must be noted that installation of CCTV is forbidden in certain stores, for instance, those in some malls. It is the responsibility of the Director of Operations to consider this before installation.

For existing stores, it is the responsibility of the Facilities team to ensure that signage is in place notifying employees & customers of the use of CCTV. For new stores, it is the responsibility of the Construction team to ensure that appropriate signage is in place. If CCTV cameras need to be moved for any reason, this is the responsibility of the Facilities team. If the CCTV is moved to be used for a different purpose than the one for which it was originally installed, the Compliance team must be consulted first.

Every store with CCTV must have a clear sign outlining the purposes for which we are recording video surveillance (with writing and a pictogram of a camera). It is recommended that this sign be visible to all employees and guests and should ideally be placed at the entry to the store. The sign must include a QR code linking back to the CCTV Policy on our website. A template for this sign can be found at Appendix B to this document.

CCTVs can only be placed above the till in cash markets and only if there is suspected theft. All CCTV that may capture employees at the till must be accompanied by a sign at the till notifying employees of the presence of CCTV.

All CCTV power sockets must be installed in the rack cabinet so that they are not accessible and cannot be switched off by employees or customers.

CCTV cameras must not be placed in any areas that are designated for employees to take breaks/rest or any bathroom facilities. This excludes stockrooms. Any CCTV cameras placed in stockrooms must also include a sign at the entry to the stockroom in addition to the signs accompanying each camera in-store.

CCTV Purposes

CCTV must only be installed & utilised for one of the purposes identified in the JOE & THE JUICE CCTV Policy. CCTV **cannot** be used in any market for continuous monitoring of employees as there must be a legitimate purpose for which CCTV is utilised.

Market Specific Requirements

Belgium specific requirements

In Belgium, all CCTV cameras installed must be notified to the police authorities via the official online platform (www.aangiftecamera.be). This notification must be submitted no later than the day before the cameras begin operating. This notification must be annually validated and updated, if necessary.

Access Requests

All CCTV recordings will be stored in our software provider's system which is managed by Corporate IT.

The following table sets out who is allowed to request direct access to CCTV footage & the reasons for which they may request access:

Role	Reason
Director of HR	Crime in store by employee
Director of Operations	
Director of Operations	Crime in store by vendor or customer including monitoring of safes
Director of Facilities	
Director of HR	Employee misconduct
Director of Operations / Supply Chain	Delivery issue / monitoring
Director of Construction	Monitoring construction projects & after-hours contractor works
Director of Facilities	
Legal team	Legal claim or investigation
Risk, Compliance & Safety team	
Whistleblower investigators	Whistleblower complaint relevant to in store occurrence

All access requests for CCTV footage by the above roles must be either lodged using a JIRA ticket. All access requests must include a reason for requiring the footage in accordance with the permissible reasons listed in the JOE & THE JUICE CCTV policy.

If access to CCTV is required by other team members within a department, this must be approved by Compliance. Please send an email to privacy@joejuice.com stating the following:

- Purpose of access request.
- Who requires access.
- Specific timeframe for which footage is required.
- How long you anticipate you require access to footage (taking into consideration the retention periods set out in our CCTV Policy).
- Location of CCTV (i.e. - specific store or market).

Compliance will then create a running table for IT of who is allowed access to CCTV & for which purpose/market & timeframe.

Storage & Sharing of CCTV Footage

If access is granted to CCTV footage, you must not share this footage with any individual (other than those specified in these documents) without prior permission from the Legal or Compliance team.

You must store the footage you request access to in a secure SharePoint folder that is only accessible by you. This footage must be deleted once it has been used for the purpose for which it was requested (and in accordance with the retention periods set out in the CCTV policy).

If you are required to share the footage with a third party, such as law enforcement, you must ensure that each data subject's face is blurred, unless they are the subject for which the footage is required (e.g. – the perpetrator of a crime).

If you have any questions, please direct them to privacy@joejuice.com

Acknowledgement

I, _____ acknowledge that I have read in full JOE & THE JUICE's CCTV Policy & CCTV Responsibilities documents and confirm that I will adhere to the requirements set out in all circumstances.

Signed,

(Signature)

(Date)

APPENDIX A

A RACI matrix clarifies who is **Responsible**, **Accountable**, **Consulted** & **Informed** for tasks within a project, ensuring clear ownership, accountability and stakeholder alignment to reduce confusion.

- **Responsible:** Who does the work.
- **Accountable:** Who approves & owns the outcome.
- **Consulted:** Whose opinions are sought.
- **Informed:** Who is kept updated on progress.

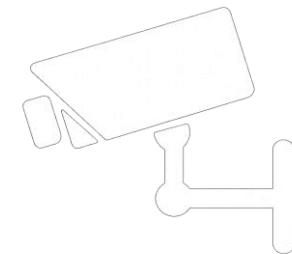
Task related to CCTV	Compliance	Legal	Construction	Facilities	Operations	HR	IT	Head/ Director of Ops
CCTV Camera Default Store Placement Location (per market)	C, I	C	C, I	R	R	R	I	A *Senior Manager of Compliance and Safety in the UK
Installation in store			R, A (new)	R (existing)	A		I	
Signage	C		R, A (new)	R (existing)				
Software management	C	C				C	R, A	
Storage & Retention period adherence	C, I						R, A	
Access requests	R, A						I	
Disclosure requests (to third parties)	R, A	C, I					R	
Permitted uses	R, A	C	I	I	I	I	I	
Hardware maintenance				R, A			C, I	

Moving of existing CCTV	C			R, A				
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APPENDIX B

As noted above, every CCTV camera installed must be accompanied by an appropriate CCTV sign. Where possible, ensure the sign is available in the local market language AND English. The sign should be in the following terms, with a link to the template provided below (available [here](#)):

THIS AREA IS UNDER
VIDEO SURVEILLANCE BY
JOE & THE JUICE A/S



The main purposes for video surveillance are crime prevention and detection and the protection of our guests and employees.

A copy of our JOE & THE JUICE CCTV Policy can be found by scanning the QR code below or visiting <https://www.joejuice.com/docs/406SltHnyXvaT1Kgwv8NLR>

Our CCTV footage is recorded for the purposes set out in our CCTV Policy & processed & stored in accordance with the Policy.



