

## **Data Processing Agreement**

### **Nature of the Processing:**

This agreement covers the management of a Closed Circuit Television (CCTV) system installed and operated at the Greatness Recreation Ground (TN14 5BX) on behalf of Sevenoaks Town Council.

The cameras will constantly record video images of the public accessing and using:

- The Greatness Recreation Ground Play Area
- The Greatness Recreation Ground Skatepark
- The Greatness Recreation Ground and Pavilion

The cameras will be installed and operated as per the Sevenoaks Town Council CCTV Policy published at <https://sevenoakstown.gov.uk/wp-content/uploads/2026/02/21-CCTV-policy-2.pdf>

The purpose of the CCTV system implementation is to:

- reduce the fear of crime by persons using the town's facilities with fear of intimidation by individuals or groups;
- reduce vandalism or property and to prevent, deter, and detect crime and disorder;
- assist the Police, the Town Council, and other Law Enforcement Agencies with identification, detection, apprehension, and prosecution of offenders by examining retrievable evidence relating to crime, public order, or contravention of bye-laws;
- assist all "emergency services" to carry out their lawful duties.

### **Parties to the agreement:**

**Data Controller:** Sevenoaks Town Council based at Council Offices, Bradbourne Vale Road, Sevenoaks, Kent, TN13 3QG

**Data Processor:** Sevenoaks Town Football Club based at The Bourne Stadium, Mill Lane, Sevenoaks, Kent, TN14 5BX

### **Responsibilities of the Data Controller:**

Sevenoaks Town Council will remain responsible for the CCTV Cameras installed and ensuring that the installation complies with the policies, procedures, and purposes of the Town Council and their legal responsibilities.

Sevenoaks Town Council will be responsible for:

- Ensuring that the Council meet their responsibilities as Data Controller for the CCTV system (e.g. lawful basis, Records of Processing Activity etc.);
- The management and periodic review of this agreement;
- Any required signage in the areas under surveillance by the CCTV system;
- Recording and processing any requests or queries from Data Subjects in relation to the CCTV system;
- Authorising and recording any disclosure of the CCTV recorded media in response to a Data Subject Access Request or data request in relation to the purposes of the installation as detailed above (e.g. police data request);

- Authorising and directing Sevenoaks Town Football Club in writing (email acceptable) to access and retrieve recorded media from the CCTV system to support the Sevenoaks Town Council investigation or disclosure request;
- Replacing any defective or damaged cameras.

For the avoidance of doubt, Sevenoaks Town Council are responsible for processing any and all queries or requests in relation to Data Subject rights as outlined in UK data protection legislation – such as Subject Access Requests, objection to processing, erasure etc.

#### **Responsibilities of the Data Processor:**

Sevenoaks Town Football Club will be responsible for operating the CCTV System on behalf of, and under instruction of, Sevenoaks Town Council.

Sevenoaks Town Football Club will be responsible for:

- Hosting the CCTV cameras on their property and the system within their premises at the Bourne Stadium;
- Periodically, and at least once a month, accessing the system to ensuring that the system is functioning correctly, media is being recorded, and media is being over-written after 30-days;
- Reporting any issues with the CCTV system to Sevenoaks Town Council without undue delay;
- Supporting Sevenoaks Town Council in its purposes by extracting recorded media without undue delay on receipt of written instructions from the Council;
- Ensuring that the CCTV system is secure and only accessed by authorised personnel with a legitimate reason to access the system;
- Ensuring that all personnel with access to the CCTV system shall be bound by confidentiality obligations in line with UK GDPR;
- Informing Sevenoaks Town Council without undue delay after it has become aware of any unauthorised access to the CCTV system;
- Ensure that queries from the public and/or data subjects are recorded and redirected to Sevenoaks Town Council without undue delay;
- Engaging sub-processors only with written authorisation of Sevenoaks Town Council;
- Assist with any reasonable request by Sevenoaks Town Council to audit or inspect the CCTV implementation and system;
- Assisting, with reasonable endeavours, Sevenoaks Town Council with its responsibilities as a Data Controller of the CCTV system.

#### **Data Retention:**

The CCTV system will automatically write over any recorded media after 30-days. Sevenoaks Town Football Club will not retain any recorded media from the Sevenoaks Town Council for longer than 30-days unless it has been specifically requested or authorised to in writing by Sevenoaks Town Council.

#### **Duration of the Agreement:**

This agreement will continue for the duration that the CCTV Camera system is in place and monitoring the public areas. Sevenoaks Town Council will periodically review this agreement, and the CCTV System implementation, to ensure that it continues to meet its purposes.

On termination of this agreement, Sevenoaks Town Football Club will immediately cease processing video images and recordings on behalf of Sevenoaks Town Council and will either return or securely dispose of any recorded media as agreed with the Council.