

Fleet Camera Data Retention Policy Checklist

UK GDPR compliance for vehicle camera footage

RETENTION POLICY — MUST INCLUDE

- ☐ Categories of footage defined (routine / incident-flagged / SAR-related)
- ☐ Retention period for routine unflagged footage (e.g. 30 days — loop overwrite)
- ☐ Retention period for incident-flagged footage documented with purpose
- ☐ Retention period for footage under SAR / active legal proceedings
- ☐ Named person responsible for applying retention periods
- ☐ Process for flagging clips for extended retention (clip lock / cloud upload)
- ☐ Process for deleting extracted footage when retention period expires
- ☐ Deletion log maintained for extracted footage
- ☐ Policy reviewed annually and updated when camera systems change

INCIDENT FOOTAGE RETENTION REFERENCE

- ☐ Insurance claim — vehicle damage: Up to 6 years (Limitation Act 1980)
- ☐ Personal injury claim: Up to 3 years from incident / date of knowledge
- ☐ Employee disciplinary: Duration of process + any appeal period
- ☐ Criminal proceedings: Until case fully concluded including appeals
- ☐ Subject access request: Duration of SAR response process

GDPR COMPLIANCE — LAWFUL BASIS AND DOCUMENTATION

- ☐ Lawful basis documented — legitimate interests (safety monitoring + claims evidence)
- ☐ Legitimate Interests Assessment (LIA) completed and on file
- ☐ DPIA completed — required for systematic employee monitoring (camera on all vehicles)
- ☐ DPIA addresses both external and driver-facing cameras separately
- ☐ ICO registration in place — data protection fee paid annually
- ☐ Organisation's data processing record updated to include vehicle camera footage

DRIVER NOTIFICATION

- ☐ Written notice provided to all drivers before cameras operational
- ☐ Notice covers: what is recorded, purpose, retention periods, who can access
- ☐ Driver-facing camera addressed specifically in notice
- ☐ New driver induction includes camera policy acknowledgment
- ☐ Signed acknowledgment retained on file for each driver

VEHICLE SIGNAGE AND SUBJECT ACCESS REQUESTS

- ☐ CCTV notice visible on exterior of each vehicle with cameras
- ☐ Signage includes operator name and data subject enquiry contact point
- ☐ SAR process documented — response within one month
- ☐ SAR log maintained — dates received, responded, footage provided or withheld
- ☐ Exemption procedure documented — footage withheld pending litigation