

Cult CCTV Surveillance System Policy

1. Introduction

a. CultFit Healthcare Private Limited (the “Cult”) has in place and is further developing a CCTV surveillance system (the “System”) for all Cult.Fit fitness centers and related properties (the “Site”). The Site comprises for this purpose all Cult properties, whether leased or owned or franchised or utilized for running fitness centers or not, geographically located within the Republic of India. Images and videos can be monitored and are recorded centrally and will be used in strict accordance with this Cult CCTV surveillance system policy (the “Policy”).

b. Definitions

“**CCTV**” means Closed Circuit Television.

“**Data Subject**” means an individual who is a subject of personal data.

“**System Manager**” shall mean, for the purposes of this Policy, the member of staff with specific responsibility for management and control of the Systems.

“**System**” means the Cult’s CCTV Surveillance System including CCTV cameras.

“**Data**” in this context includes digital video images recordings.

“**Personal Data**” has the meaning, which in this context includes, but is not limited to, video footage from which a person can be recognised, and video footage containing information about an identifiable individual.

“**Data Controller**” refers in this context to CultFit Healthcare Private Limited, which shall be the data controller for personal data processed by Cult including visual data from its System.

2. Purpose of the System

a. The System has been installed by Cult with the purpose of reducing the threat of crimes generally, securing Cult Site(s), conducting quality and SOP adherence audits, and helping to ensure the safety of all Site(s) staff, customers and visitors consistent with respect for the individual's privacy. These purposes will be achieved by monitoring the system to:

- i. Deter those having criminal intent;
- ii. Assist in the prevention and detection of crime;
- iii. Facilitate the identification, apprehension and prosecution of offenders in relation to crime and public order;
- iv. Identify quality and SOP adherence levels and undertake appropriate remedial actions;
- v. Facilitate the identification of any activities/event which might warrant disciplinary proceedings being taken against staff or customer or visitor and assist in providing evidence to management and/or to a member of staff against whom disciplinary or other action is, or is threatened to be taken.

The system may also be used for the purpose of health and safety, particularly in the fitness centers, to ensure individuals using this facility on their own are being monitored

in case they become injured and need support. The system will not be used to provide live streaming images for public access.

b. Covert recording

- i. Covert cameras may be used under the following circumstances only on the written authorisation or request of the Cult management and where it has been assessed by Cult senior management:
 1. that informing the individual(s) concerned that recording was taking place would seriously prejudice the objective of making the recording;
 2. that there is a reasonable cause to suspect that unauthorised or illegal activity is taking place or is about to take place;
 3. that resort to covert recording is, in all the circumstances, proportionate given the impact this may have on the privacy and related interests of individuals.
- ii. Any such covert processing will only be carried out for a limited and reasonable period of time consistent with the objectives of making the recording to capture evidence of the specific suspected unauthorised activity. The decision to adopt covert recording will be fully documented and will set out how the decision to use covert recording was reached and by whom and whether any steps can be reasonably taken to reduce collateral intrusion;
- iii. Any data collected will be dealt with under the principles set out elsewhere within this policy.

3. Operation of the System

- a. The system is operational and images are capable of being monitored for twenty-four hours a day throughout the whole year. Real time monitoring facilities are available in Curefit HQ1 RoC.
- b. The public and Cult community are made aware of the presence of the system by appropriate signage placed at the entrances to Cult Site(s).
- c. To ensure privacy, wherever practicable, the CCTV cameras are prevented from focusing or dwelling on domestic accommodation. CCTV cameras are predominantly positioned facing outwards towards external entrances to Cult Site(s). Any cameras facing into public areas are sited so that the minimum amount of collateral intrusion is caused in order to achieve the stated purposes.
- d. Data captured by cameras will be recorded on equipment located securely within Cult buildings. The System Manager will have monitoring equipment which will allow them to monitor live images from the cameras, but will also have the facility to search and view stored images. Any transfer of images onto other media will only take place in line with saving the images for achieving one of the purposes of the system outlined above. Transfer of images onto other media will only be carried out by the System Manager. Should it be necessary to create a copy of any data onto other media, a Cult incident report will be created by the system manager detailing: the reasons why

the copy was made, the date and time stamps of the recording, the format of the copy and to whom the copy was distributed.

e. Authorised IT staff will be able to access the System to carry out maintenance and upgrade support functions, and are not permitted to access this System for reasons outside their scope of authority.

f. All recording media used for the monitoring and capture of images on the Cult's CCTV system belongs to and remains the property of Cult. Any decision to retain data / recordings over the specified retention period will be fully documented and will set out how the decision to retain information was reached, including for release to a third party (including the Police).

g. Recorded images / videos will be retained for no longer than required for the purpose for which they were originally obtained, after that time the images / videos are automatically overwritten by the recording equipment (currently 30 days).

4. Access to Recordings by Staff or Third Parties

a. It is important that access to and disclosure of images / videos is restricted and carefully controlled, not only to ensure that the rights of individuals are preserved but also to ensure that the chain of evidence remains intact should the images be required for evidential purposes. In general, viewing of live images will be restricted to the Cult and its franchisees' authorized employees. Any other persons seeking to view recorded images will require the prior authority of the System Manager.

b. Requests by persons outside Cult (other than the Police) for viewing or obtaining recordings will be assessed on a case by case basis by the Cult management and access will only be granted as and when the purpose is deemed fit. All requests for access will be recorded on a Cult incident report detailing the date and time at which access was allowed/or disclosure made; the reason for the access/disclosure; the extent of the information accessed/disclosed; name of the employee providing access. If access to images / videos is denied to any member of staff or third party (including the Police), the Center Manager will document the reasons for the denial and the information will be logged at the Control Room.

c. Access by Police: Where a police officer requests access to CCTV images / video either by viewing such data or requesting a copy of the data, they should supply the Cult and / or its franchisees, as may be applicable, with a formal written request. Requests for access to images / videos by the Police will not normally be denied and can be made without the authority of the System Manager, except for franchisees, provided they are accompanied by a written request signed by a Police Officer, who must indicate that the images / videos are required for the purposes of a specific crime enquiry.

d. Anyone who believes that they are a subject of Personal Data recorded by the System is entitled to ask for a copy of the data. However, they do not have the right of instant access. A Data Subject who wishes access to their Personal Data should apply in writing to the Cult management or the relevant franchisee, which will forward such

request to the Cult management. The concerned manager will then arrange for a copy of the data to be made and given to the applicant. The Data Subject should not ask a member of staff to show them the data, or ask anyone else for a copy of the data. All communications should go through the Cult Grievance Cell (hello@curefit.com). A response will be provided promptly and in any event within forty days. Where Cult is unable to comply with an access request without disclosing information relating to another individual who can be identified from that information, it is not obliged to comply with the request unless that individual has consented to the disclosure or it is reasonable, in the circumstances, to comply without the consent of the individual.

e. Data Controllers have the right to refuse a request for a copy of the data particularly where such access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders.

f. If it is decided that a Data Subject access request is to be refused, the reasons will be fully documented and the Data Subject informed in writing, stating the reasons.

5. Complaints

It is recognised that Cult members, i.e. staff and customers, and others may have concerns or complaints about the operation of the System. Any complaint about the operation of the System should be addressed in the first instance to the Data Manager (hello@curefit.com).

6. Governing Laws

This Policy shall be governed by and constructed in accordance with the Laws of India and disputes arising in relation hereto shall be subject to the exclusive jurisdiction of courts, tribunals, fora, applicable authorities at Bangalore.

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