

This policy establishes guidelines for the use of facial recognition technology (FRT) within Drakes Supermarkets to ensure compliance with privacy laws, ethical standards, and customer and employee expectations. The goal is to leverage FRT responsibly to enhance security, operational efficiency, and customer experience while protecting individual rights.

This policy applies to all Drakes Supermarkets locations, employees, contractors, customers, and any third-party service providers involved in the implementation or management of FRT.

Drakes Supermarkets uses facial recognition technology to:

- Enhance the safety and security of our stores, employees, and customers.
- Prevent theft, fraud, and other unlawful activities.
- Improve operational efficiency and customer service.
- FRT will not be used for discriminatory, invasive, or unrelated purposes such as monitoring employee performance or targeting individuals unfairly.

## Data Collection and Use

**Data Minimization:** Facial recognition data will only be collected for clearly defined purposes outlined in this policy.  
**Lawful Basis:** Drakes will collect, store, and process facial recognition data in compliance with Australian Privacy Principles (APPs) and other relevant regulations.

**Consent:** Explicit consent will be obtained where required, and clear signage will notify customers and employees when FRT is in use.

**Use Cases:**

- Identifying repeat offenders (e.g., individuals involved in theft or fraud).
- Enhancing store security and loss prevention.

## Data Storage and Retention

**Secure Storage:** Facial recognition data will be encrypted and stored on secure servers with restricted access.  
**Retention Period:** Data will be retained only as long as necessary for the intended purpose and then permanently deleted.

**Access Control:** Only authorized personnel with a legitimate need will have access to facial recognition data.

## Privacy and Transparency

**Notification:** Customers and employees will be informed about the use of FRT through visible signage, written communications, and our privacy policy.

**Rights:** Individuals can request access to their data, seek corrections, or opt out where feasible and lawful.

**Privacy Impact Assessments:** Drakes will conduct regular assessments to ensure FRT complies with privacy laws and does not unduly impact individuals.

## Ethical Use

**Non-Discrimination:** FRT will be used in a way that does not discriminate based on race, gender, age, or other personal characteristics.

**No Surveillance:** Drakes does not use FRT for constant surveillance or tracking of customers or employees.

## Accountability and Training

**Oversight:** A designated privacy officer will oversee FRT operations to ensure compliance.

**Employee Training:** Employees with access to FRT systems will receive training on data protection, privacy, and ethical use of the technology.

**Audits:** Regular audits will be conducted to monitor adherence to this policy.



## Breach Management

- Incident Reporting: Any data breach involving FRT will be promptly reported to the appropriate authorities and impacted individuals, as required by law.
- Mitigation: Steps will be taken to contain and mitigate the impact of any breach.

## Policy Review

This policy will be reviewed annually or in response to significant changes in legislation, technology, or operational needs.

## Approval and Implementation

This policy has been approved by Drakes Supermarkets' leadership team and will be implemented across all applicable locations.

## Contact Information

For questions or concerns about this policy, please contact the Company Officer on [human.resources@drakes.com.au](mailto:human.resources@drakes.com.au)

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