

This is a summary of the decision of the Commissioner.

1. Her organisation (...) has installed CCTV cameras that capture all her acts and movements, including when she scratches her head, nose, or any part of her body.
2. As a woman, she feels ashamed that adjusting her clothes (Uniform) or underwear is also being captured by the CCTV monitored by a male security officer. She is presently being heard before a disciplinary committee set up by her employer, and all these CCTV footages are being viewed by unauthorised persons.
3. She was never informed nor consented that these footages would be used for any disciplinary action initiated by her employer. She doubts whether her employer is a registered data controller/processor for this specific camera.
4. She requests an investigation into these illegal acts and doings of her employer (...).She clarifies that her complaint is not against CCTV cameras installed for security reasons where the public has access.

Following the statement provided by the Complainant, the Data Protection Office has been informed by the Respondents by way of letter that:

1. One Respondent is a creditor of the company in question, and the company owes a significant sum of money. This information had not been revealed to the sole representative of the company (as per the notice of appointment of liquidator) by the Complainant, who maintained that there was no obligation to do so.
2. *"The contention that the creditor is an unrelated third party that received confidential information about the liquidation of the company that owes it such a considerable sum is unfounded and appears to be an attempt by the Complainant to divert attention from the actions of its officers in placing the company into liquidation shortly before the monies became due."*
3. *"Furthermore, the individual to whom the email was sent, and who is mentioned in the letter, is in regular contact with the sole representative of the company (as per the notice of appointment of liquidator) as well as with the ultimate beneficial owner of the creditor, and has engaged in discussions by email regarding the resolution of the outstanding debt owed by the company."*
4. The liability arises from an agreement between the company and the creditor. The representative of the Respondent sought the approval of its ultimate beneficial

owner to share details of the loan with the sole representative of the company (as per the notice of appointment of liquidator).

5. The matter was subsequently referred to the Police for an in-depth enquiry, given that there may be financial issues at stake, before reaching any determination.

On the same day, Complainant replied as follows:

"Dear Sir,

We refer to your letter dated (.....).

We thank you for your time and effort on this matter."

Complainant advised to end the matter. No referral to the Police.

The Data Protection Commissioner has decided as follows:-

In view of the above, the enquiry has not disclosed the commission of an offence under the DPA and is closed to the satisfaction of all parties under section 6 of the Data Protection Act 2017 (DPA).