

The PAS Fund

CCTV Policy

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Introduction

The PAS Fund, as a data controller, processes the personal data of individuals through its use of Closed Circuit Television (CCTV) in its building at 39 Prospect Hill, Galway ("Atlantic House"). Recognisable images captured by CCTV systems are personal data and are therefore subject to the provisions of the General Data Protection Regulation (GDPR) and the Data Protection Acts 1988-2018 [hereafter referred to as "data protection legislation"].

Purpose of Policy

The purpose of this policy is to regulate the use of CCTV in the monitoring of both the internal and external environs of Atlantic House. The aim is to ensure that CCTV is used transparently and proportionately in accordance with data protection legislation, the PAS Fund's Data Protection Policy and guidance provided by the Data Protection Commission.

Scope

This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material. In Atlantic House it applies to all employees of businesses operating in the building, residents and their respective clients and visitors.

Ownership of the CCTV System

The PAS Fund is the data controller and all recorded material is the property of The PAS Fund.

Purposes of CCTV

CCTV surveillance is employed for the following purposes:

- Security:
 - To assist in providing for the security of businesses, their staff, residents and visitors;
 - to periodically monitor and protect Atlantic House;
 - to assist in the prevention and detection of crime and prosecution of offenders.
- Risk Management:
 - To assist in providing for the safety of businesses, their staff, residents and visitors;
 - to assist in the resolution of incidents involving workplace hazards, injuries or near misses;
 - to assist in the processing of allegations/claims against The PAS Fund.

- Evidence

To enable the PAS Fund to respond to legitimate requests from third parties for CCTV footage of incidents e.g. for legal proceedings or insurance investigations. Where, in the

carrying out of these purposes, images are obtained of persons committing acts of an illegal nature and / or acts which breach other rules and regulations, these may be used as evidence. While every effort has been made in the layout of the CCTV system to give it maximum effectiveness, it is not possible to guarantee that it will detect every incident that takes place in Atlantic House or otherwise on the property.

Lawful Basis

The lawful basis permitting the processing of images of individuals for the above purposes is Article 6(1)(f) of the GDPR i.e. the processing is necessary for the legitimate interests pursued by The PAS Fund.

Signage

Signage is displayed at prominent locations throughout the building so that businesses, their employees, residents and visitors are aware that CCTV cameras are in use.

Installation and Maintenance of the CCTV System

CCTV systems are installed by PSA licensed CCTV companies contracted by the PAS Fund. The CCTV companies may operate under the instruction of The PAS Fund and provide The PAS Fund with images of 3rd parties when an approved access request is received. In so doing, the CCTV companies are considered to be data processors. Data protection legislation places a number of obligations on data processors, including having appropriate security measures in place to prevent unauthorised access to data or unauthorised alteration, disclosure or destruction of data.

Management, Storage & Retention of CCTV Footage

The system is managed by Cian Dooley as CCTV administrator:

Recordings are stored on a computer hard-drive accessed only by authorised personnel. Viewing is restricted to authorised personnel. In accordance with data protection legislation, CCTV footage is retained for no longer than is necessary. All recordings are retained for a maximum of 28 calendar days. After this time, they are safely deleted. When used in conjunction with an investigation or as evidence, recordings may be retained by request specifically in that context until the issue is resolved. After this period, images are safely deleted.

Procedure for Handling Access Requests

Disclosure of images from the CCTV system is controlled and consistent with the purposes for which the system exists. All requests to access CCTV footage are channelled through the CCTV administrator.

Subject Access Requests

Individuals have the right to access their personal data including their image in CCTV recordings. Requests shall be made in writing to the CCTV administrator, either by email to information@atlantichouse.ie. Requests must include the date, time and location where the CCTV image was recorded. ID may be required. The PAS Fund aims to respond promptly and at the latest within one month of receiving a valid request. Downloading of footage is carried out by the CCTV administrator. Recorded material is handled with care and in a confidential

manner to ensure complete regard for individual privacy. Footage is downloaded onto a DVD or memory stick; a copy is given to the requester and a copy is retained by The PAS Fund. The footage in question is retained until the purpose for which it was downloaded has ended, at which point the footage is safely and permanently deleted.

Third-Party Access

Access Requests by An Garda Síochána :

Access requests by An Garda Síochána shall be processed where such processing is necessary and proportionate for preventing, detecting, investigating or prosecuting criminal offences. Requests are approved by the CCTV administrator.

Other Third-Party Access :

Disclosure of information to other third parties is made in strict accordance with the purposes of the system and is limited to the following authorities: - CCTV Administrator, Legal or insurance representatives of data subjects and CCTV companies for service/repair.