



Comhairle Contae
Ros Comáin
Roscommon
County Council



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ROSCOMMON COUNTY COUNCIL

Privacy Statement

CCTV (Closed Circuit Television) Systems

April 2019

Version Control

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Service	Data Protection			
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1.0 Introduction

Closed Circuit Television (CCTV) is used by Roscommon County Council for a number of purposes. This use may involve the recording of personal data of individuals. Roscommon County Council is obliged to protect such personal data in accordance with provisions contained in the General Data Protection Regulation (GDPR) which came into effect on 25th May 2018 and the Data Protection Act 2018.

2.0 Purpose of Privacy Statement

The purpose of this privacy statement is to describe, in clear and concise terms, the personal data that the County Council's CCTV systems may collect about individuals, why it is needed, how it is used and how individuals may interact with the Council in relation to the use of their personal data by its CCTV systems. It also outlines the rights of individuals under data protection legislation in relation to the processing of their personal data.

3.0 Definitions

For the purposes of this privacy statement the following definitions apply:

- **Data Subject:** is an individual who is the subject of personal data.
- **Personal Data:** any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

4.0 Scope

This statement applies to all personal data processed by Roscommon County Council's CCTV systems which are located as follows:

Location	County Council Department	No. of Cameras
Civic Centre, Monksland, Athlone	Athlone Municipal District	8
Council Depot, Monksland, Athlone	Athlone Municipal District	1
Aras an Chontae (including Courthouse, Parochial House and Town Centre Car Parks)	Corporate Services	53
Mobile Cameras (placed where there is a problem with illegal dumping)	Environment	Maximum of 25
Roscommon Fire Station	Fire Services	7
Castlerea Fire Station	Fire Services	7
Traveller Accommodation Halting Site, Castlerea	Housing	12
Library HQ, Roscommon	Library Service	14
Boyle Branch Library	Library Service	4
Ballaghaderreen Branch Library	Library Service	5
Castlerea Swimming Pool	Roscommon Municipal District	3
Roscommon Town - Various Locations	Roscommon Municipal District	25
Lecarrow Pump House	Water Services	1
Roscommon Waste Water Treatment Plant	Water Services	1

5.0 Data Protection Policy

Roscommon County Council is committed to ensuring that personal data processed by its CCTV Systems is:

- Obtained lawfully, fairly and in a transparent manner;
- Obtained for specified, explicit and legitimate purposes only;
- Adequate, relevant and limited to what is necessary for purpose for which it was obtained;
- Recorded, stored accurately and securely and where necessary kept up to date;
- Kept only for as long as is necessary for the purposes for which it was obtained;
- Kept in a form which permits identification of the data subject;
- Processed in a manner that ensures the appropriate security of the personal data including protection against unauthorised or unlawful processing.

Roscommon County Council has a Corporate Data Protection Policy which goes in to more detail as to how it intends meeting these commitments. A copy of this document can be accessed [here](#).

6.0 What Personal Data is Processed

Personal data processed by Roscommon County Council's CCTV systems consists of the following recordings:

- Images of individuals;
- Images of activities carried out by individuals;
- Images of number plates of vehicles.

7.0 Why Personal Data is Processed

Personal data is processed by Roscommon County Council's CCTV systems in order to:

- Safeguard persons and property located on Roscommon County Council premises and its environs.
- Exercise its own law enforcement powers e.g. the prevention, investigation and prosecution of offences under litter and waste management legislation.
- Secure public order and safety in public places by facilitating the deterrence, prevention, detection and prosecution of offences and anti-social behaviour.
- Support An Garda Síochána to deter, prevent, detect and prosecute crime.

8.0 The Legal Basis for Processing Personal Data

Under data protection law, the processing of personal data requires a legal basis. The legal basis for Roscommon County Council's use of CCTV systems to process personal data consists of any one or more of the following:

- The processing is necessary for compliance with a legal obligation to which Roscommon County Council is subject;
- The processing is necessary for the performance of a task carried out in the public interest or in the exercise of an official authority vested in Roscommon County Council;
- The processing is necessary for the purposes of the legitimate interests pursued by Roscommon County Council.

9.0 How Personal Data is Obtained

Personal data obtained by CCTV systems will mainly be recorded by cameras that are positioned in fixed locations. From time to time Roscommon County Council may use mobile cameras for the purpose of carrying out its own law enforcement functions.

10.0 How Personal Data is Processed

The processing of personal data by staff within the Roscommon County Council is restricted to

- Employees who are designated as having responsibility for ensuring that the operation of a CCTV system is consistent with data protection legislation and
- Persons who are authorised to access the CCTV system.

11.0 Sharing Personal Data with Third Parties

11.1 Personal data recorded by the Council's CCTV systems may be supplied to An Garda Síochána for the purpose of securing public order and safety in public places by facilitating the deterrence, prevention, detection and prosecution of offences.

11.2 Access by other third parties, such as public bodies, private organisations and individuals other than the data subject, to CCTV recordings will only be provided in limited circumstances that are permitted by law.

12.0 Records Retention Policy

12.1 Data recorded on CCTV systems shall be kept for no longer than is considered necessary.

12.2 Normally data recorded on CCTV systems will not be retained by Roscommon County Council beyond a maximum of 28 days.

12.3 Data recorded on CCTV systems may however be retained by Roscommon County Council beyond a maximum of 28 days in circumstances where the data is required for evidential purposes and/or legal proceedings.

13.0 Data Subject Rights

Data subjects have a range of rights under GDPR. These include the following:

- The right to be informed;
- The right of access;
- Right to rectification of inaccurate or incomplete data;
- The right to erasure (also known as the 'right to be forgotten') of personal data;
- The right to portability;

- The right to object to the processing of personal data;
- The right to restrict the processing of personal data;
- Rights in relation to automated decision making, including profiling.

Roscommon County Council has developed a Data Subject Rights Policy and Procedures document which provides more detailed information on the rights of a data subject and how to exercise them. A copy of this document is available [here](#).

14.0: Complaints to the Data Protection Commission

14.1 Data subjects may make a complaint in the following circumstances:

- a) If they experience a delay outside of the prescribed timeframe for making a decision on a data subject right request;
- b) If they are dissatisfied with a decision by Roscommon County Council on their data subject right request;
- c) If they consider that Roscommon County Council's processing of their personal data is contrary to data protection legislation.

14.2 Contact details for the Data Protection Commission are as follows:

Phone Number: 0761 104 800 or Local 1890 252 231
E-mail: info@dataprotection.ie
Website: www.dataprotection.ie
Postal Address: Data Protection Commission
Canal House
Station Road
Portarlinton
Co. Laois
R32 AP23.

15.0 Monitoring and Review

Provisions contained in this statement shall be subject to on-going monitoring and review.

16.0: Further Information

Further information and advice on the operation of this privacy statement is available from the Data Protection Officer, Roscommon County Council. Contact details for the County Council's Data Protection Officer are as follows:

Phone:	090 6637100
E-mail:	dataprotection@roscommoncoco.ie
Website:	www.roscommoncoco.ie
Postal Address:	Roscommon County Council Áras an Chontae Roscommon F42 VR98.