



Comhairle Contae
Ros Comáin
Roscommon
County Council

**COMHAIRLE CONTAE ROS COMÁIN
ROSCOMMON COUNTY COUNCIL**

Privacy Statement

For

Dash Cam Usage

November 2019

Version Control

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Service	Data Protection			
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1.0 Introduction

Dashboard mounted cameras i.e. dash cams are used by Roscommon County Council for a number of purposes. This use may involve the recording of personal data of individuals including their recognisable images. Roscommon County Council is obliged to protect such 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 dash cam 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 dash cam 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 dash cam systems which may be located/placed in any vehicle operated by the Council for the purpose of carrying out any activity outlined in this document.

5.0 Data Protection Policy

Roscommon County Council is committed to ensuring that personal data processed by its dash cam 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 the 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 dash cam systems consists of the following recordings:

- Images of individuals;
- Other personal data that identifies 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 dash cam systems in order to:

- Assist in the protection and the safeguarding of persons and property.
- Support the administration and processing of insurance and legal claims.
- Visual surveying of road conditions.

8.0 The Legal Basis for Processing Personal Data

Under Articles 6 and 9 of the GDPR, the processing of personal data requires a legal basis. The legal basis for the Council's use of dash cams to process personal data includes any one or more of the provisions contained in these Articles and in particular 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 in order to protect the vital interests of the data subject or of another natural person;
- 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;

9.0 How Personal Data is Obtained

Personal data obtained by dash cam systems will mainly be recorded by cameras that are placed, either permanently or from time to time, within any vehicle being operated by Roscommon County Council.

10.0 How Personal Data is Processed

10.1 Processing of personal data may be carried out by:

- Employees who are authorised to access dash cam systems.
- Third party dash cam service providers that may be engaged by the Council.

10.2 The processing of personal data shall not be carried out for any other purposes than those outlined in this statement.

10.3 The processing of personal data shall be limited and proportionate for the purposes for which it was obtained.

11.0 Sharing Personal Data with Third Parties

11.1 The provision of personal data, including dash cam recordings, to An Garda Síochána for the purposes of investigating and/or prosecuting a criminal offence is permitted under provisions contained in the Data Protection Act 2018.

11.2 Access to dash cam recordings will be provided, where required and in accordance with data protection legislation, to Roscommon County Council's insurance and legal advisors in the event of an incident, accident, claim and in any other circumstance that is considered necessary and appropriate.

11.3 Access by third parties other than An Garda Síochána and Roscommon County Council's insurance and legal advisors to dash cam recordings will only be provided in circumstances that are permitted by data protection legislation.

12.0 Records Retention Policy

12.1 Dash cams are typically designed to record continuously whenever they are powered up. Recordings are routinely overwritten as new material is being recorded. Recordings are not normally extracted and retained.

12.2 Roscommon County Council will however extract dash cam recordings and retain them for as long as it considers necessary in a limited number of circumstances. These circumstances include situations where the data is required for operational reasons related to the surveying of road conditions and for investigative, evidential, insurance and legal purposes.

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.