



**Comhairle Contae  
Ros Comáin**  
Roscommon  
County Council

**COMHAIRLE CONTAE ROS COMÁIN  
ROSCOMMON COUNTY COUNCIL**

**Privacy Statement  
For  
Dash Cam Usage**

**March 2023**

## Version Control

Department	Corporate Services			
Service	Data Protection			
Document Title	Privacy Statement – Dash Cam Usage			
Document Reference No.	DP-2-19			
Version No.	V.1			
Prepared By.	Brian Duffy, Data Protection Officer	Date:	November 2019	
Approved By.	Management Team	Date:	22/11/2019	
Revisions:				
Version No.	Revised by	Date	Approved by	Date
V.2	Brian Duffy, Data Protection Officer	03/03/2023	Management Team	21/03/2023

## Contents

	Page No.
1.0 Introduction .....	3
2.0 Purpose of Privacy Statement .....	3
3.0 Definitions .....	3
4.0 Scope .....	3
5.0 Data Protection Policy .....	4
6.0 What Personal Data is Processed .....	5
7.0 Why Personal Data is Processed .....	5
8.0 The Legal Basis for Processing Personal Data .....	5
9.0 How Personal Data is Obtained .....	6
10.0 How Personal Data is Processed .....	6
11.0 Sharing Personal Data with Third Parties .....	6
12.0 Records Retention Policy .....	7
13.0 Data Subject Rights .....	7
14.0: Complaints to the Data Protection Commission .....	8
15.0 Monitoring and Review .....	8
16.0 Further Information .....	9

## **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 identifiable 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 25<sup>th</sup> 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 identified or identifiable natural person to whom personal data relates.
- **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 privacy 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 creates, collects and processes a significant amount of personal data in various formats on a daily basis.

It is the policy of Roscommon County Council that:

- It will seek to act at all times in full compliance with data protection legislation in its processing of personal data;
- GDPR principles are respected and strictly adhered to;
- The rights of data subjects are fully respected and protected;
- Measures exist to respond appropriately to personal data breaches;
- Appropriate governance mechanisms exist to oversee compliance with data protection legislation.

Roscommon County Council is fully committed to ensuring that the personal data processed by its dash cam systems is:

- Obtained lawfully, fairly and in a transparent manner;
- Obtained for only specified, explicit and legitimate purposes;
- Adequate, relevant and limited to what is necessary for the purposes 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 only in a manner that ensures the appropriate security of the personal data including protection against unauthorised or unlawful processing.

Roscommon County Council has developed a ***Data Protection Policy and Procedures for Dash Cam Usage*** which go in to more detail as to how it intends meeting these commitments.

## **6.0 What Personal Data is Processed**

Personal data processed by Roscommon County Council's dash cam systems includes the following:

- Images that identify 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 cam systems 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:

- Article 6(1)(c) of the GDPR where the processing is necessary for compliance with a legal obligation to which Roscommon County Council is subject;
- Article 6(1)(e) of the GDPR where 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;
- Article 6(1)(f) of the GDPR where the processing is necessary for the purposes of the legitimate interests pursued by Roscommon County Council. This does not however apply to processing carried out by the Council in the performance of its tasks.

## **9.0 How Personal Data is Obtained**

Personal data obtained by dash cam systems will generally 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** The processing of personal data obtained through dash cams by Roscommon County Council staff is restricted to Authorised Employees only.

**10.2** Personal data obtained by dash cams shall be processed through use of administrative processes and technological systems that are designed to process such data for the purposes for which it was obtained.

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

**10.4** The processing of personal data shall be limited and proportionate to 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 of personal data (also known as the 'right to be forgotten');
- 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's ***Corporate Data Protection Policy and Procedures*** provide more detailed information on these rights and how to exercise them.

#### **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 request to exercise their data subject rights;
- b) If they are dissatisfied with a decision by Roscommon County Council on their request to exercise their data subject rights;
- 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: 01 7650100 / 1800 437737.

Postal Address: Data Protection Commission  
21 Fitzwilliam Square South  
Dublin 2  
D02 RD28.

Online: [www.dataprotection.ie](http://www.dataprotection.ie) provides details for online contact.

#### **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:	<a href="mailto:dataprotection@roscommoncoco.ie">dataprotection@roscommoncoco.ie</a>
Website:	<a href="http://www.roscommoncoco.ie">www.roscommoncoco.ie</a>
Postal Address:	Roscommon County Council Áras an Chontae Roscommon F42 VR98.