



Comhairle Cathrach
& Contae **Luimnigh**

Limerick City
& County Council

(This document is for information purposes only)

Data Protection Privacy Statement for

Drone Technology - drone usage for civic events such as St. Brigid's Day, Limerick St. Patrick's Festival, Riverfest Limerick, Halloween in Limerick incorporating Samhain and Christmas in Limerick.

Who we are and why do we require your information?

Limerick City and County Council seeks to promote the economic, social and cultural development of Limerick City and County and in doing so contribute significantly to improving the quality of life of its people. The delivery of high quality services, tailored to meet the needs of all our customers, remains one of Limerick City and County Council's core objectives and is included in our Corporate Plan. This quality service includes not only the level and quality of service given to our customers, but also the quality of our decision-making processes, the efficiency and effectiveness of our corporate operations, standard of our facilities and our ability to adapt in an ever-changing environment. In order to provide the most effective and targeted range of services to meet the needs of the citizens, communities and businesses of Limerick City and County we will be required to collect, process and use certain types of information about people and organisations. Depending on the service being sought or provided, the information sought may include 'personal data' as defined by the Data Protection Acts and by the General Data Protection Regulation (GDPR) and may relate to current, past and future service users; past, current and prospective employees; suppliers; and members of the public who may engage in communications with our staff. In addition, staff may be required, from time to time, to collect, process and use certain types of personal data to comply with regulatory or legislative requirements.

Why do we have a privacy statement?

Limerick City and County Council has created this privacy statement in order to demonstrate our firm commitment to privacy and to assure you that in all your dealings with Limerick City and County Council that we will ensure the security of the data you provide to us. Limerick City and County Council creates, collects and processes a significant amount of personal data in various multiple formats on a daily basis. Limerick City and County Council's commitment is that the personal data you may be required to supply to us 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 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 only in a manner that ensures the appropriate security of the personal data including protection against unauthorised or unlawful processing.

Data Protection Policy

Limerick City and County Council has a detailed Data Protection Policy, which outlines how we as a public body are committed to ensuring the security of any personal data you provide to us.

What is the activity referred to in this Privacy Statement?

Use of Drone Technology for the purpose of aerial photography and videography at the aforementioned festivals.

Personal data is gathered by the use of drones in order to promote activities the Council is involved in and for use as a marketing tool to promote Limerick and the aforementioned public events.

The Council is obliged to protect such personal data in accordance with the Data Protection Act 2018 and the provisions contained in the General Data Protection Regulation (GDPR). The purposes of the processing of personal data is to:

- Publicise and promote Council activities that are in the interests of communities and in the public interest generally, such as community events, public events, tourism events, arts and library events, official openings and programme launches. The publication of the footage could be via articles, reports, promotional material, the Council's website and on social media.

What is the basis for making the processing of personal data in this activity lawful?

Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in Limerick City and County Council in accordance with Article 6(1)(e) of the General Data Protection Regulation, 2016/679 and in conjunction with the legislation listed below:

- Section 43 of the Local Government (Reform) Act 2014.

We require your contact details

In order to communicate with you, you will be asked for contact details. You do not have to provide all contact details but providing more, such as email, phone, address, makes it easier to communicate. Please note that to help protect your privacy, we take steps to verify your identity before granting access to personal data. These contact details may also be used to verify your identity.

What other items of personal data do we need to undertake this activity?

Personal data processed:

- Images of persons, still and moving.

Is the personal data submitted as part of this activity shared with other organisations?

Limerick City and County Council may, to fulfil statutory or regulatory obligations or in the public interest, from time to time, have to share personal data with other organisations or entities (in Ireland or abroad). Where this is required Limerick City and County Council shall have regard to the security and integrity of the data and will minimise the data shared.

In this process, the data will be shared with the following recipients:

In the first instance access to the data is limited to authorised personnel dealing with drones within the relevant department of Limerick City and County Council, and to a third party drone operator who may be engaged by the Council.

Data is shared with the following recipients:

- Images may be published in print, digitally, on social/other media and broadcasted
- Images may be published in council reports and promotional material
- A processor (third party drone operator) may be engaged by the Council, in which case a data processing agreement will be in place
- It is sometimes a requirement of funding agencies to submit footage that demonstrate the community participation in the event for which funding was provided. Where this is the case, the government funding agency/department may be sent footage

There are no plans to transfer the personal data to a third country or international organisation.

In this activity, if the personal data is to be transferred to a different country, it will be transferred to the following countries (if there are no countries listed, it is not intended to transfer the personal data abroad).:

Footage may be produced into videos and placed on Limerick City and County Council's website Limerick.ie and other various social media channels, where it will be distributed within the domestic and international tourism trade in order to promote Limerick.

How long is this personal data held by Limerick City and County Council?

Limerick City and County Council has a detailed record retention policy which goes in to more detail of the time period for which your personal data will be retained by Limerick City and County Council and what will happen to it after the required retention period has expired.

The data processed as part of this activity will be retained for the following period(s):

In accordance with Article 5 (1) (e) of the General Data Protection Regulation footage will be kept for no longer than is necessary. In this instance, the processor will retain footage for one month after the final editing of the promotional video. In accordance with The National Retention Policy for Local Authority Records, Limerick City and County Council will retain the footage as a marketing asset and this will be reviewed every 8 years to assess whether it is still of sufficient quality to use. If deemed out-of-date, it will be deleted, otherwise it will be retained.

What will happen if the requested personal data is not provided?

You will not be requested to provide any personal data. Personal data is gathered by drones in order to promote activities that the Council is involved in.

Signage will be placed in the vicinity of the drone operator to advise the public of the following:

- drone activity is taking place
- the purpose for which the activity is being carried out
- contact details of the data controller (LCCC).

Drone operators will be easily identifiable, as they will be wearing high visibility vests stating that they are drone operators.

Your Rights

You have the right to request access to personal data held about you, obtain confirmation as to whether data concerning you exists, be informed of the content and source of data and check its accuracy. In addition, if the data held by us is found to be inaccurate you have the right to change, remove, block, or object to the use of, personal data held by Limerick City and County Council. You also have the right to data portability. In certain circumstances blocking access to data may delay or remove access to a service where the data is required by law or for essential purposes related to delivery of a service to you. To exercise these rights, you should contact Limerick City and County Council (Data Controller) at the following address:

email: dataprotectionofficer@limerick.ie

Data Protection Officer,
Limerick City and County Council,
Merchants Quay,
Limerick

Right of Complaint to the Office of the Data Protection Commissioner

If you are not satisfied with the outcome of the response you received from Limerick City and County Council in relation to your request, then you are entitled to make a complaint to the Data Protection Commissioner who may investigate the matter for you.

The Data Protection Commissioner's website is www.dataprotection.ie or you can contact their office at:

Telephone: 01 7650100
1800 437 737

E-mail: info@dataprotection.ie

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