

(This document is for information purposes only)

Data Protection Privacy Statement for

CCTV Technology

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?

CCTV Technology is used by Limerick City and County Council for the following purposes:

- Community CCTV Schemes

- Property security
- Waste Enforcement
- Health & Safety (Fire & Emergency Vehicles)
- Mobile Recording Devices (MRD's) – Body Worn Cameras for Traffic Wardens and Drones
- Traffic Management

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

The legal basis for Limerick City and County Council's use of CCTV systems to process personal data consists of one or more of the following:

- Article 6(1) (c) of the GDPR - the processing is necessary for compliance with a legal obligation to which Limerick City and County Council is subject, e.g. Health, Safety & Welfare at Work Acts.
- Article 6(1) (e) of the GDPR and Part 5 of Data Protection Act 2018 (Law Enforcement Directive (LED)) - 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 Limerick City and County Council, e.g. - In relation to Community CCTV schemes the processing is necessary in the exercise of official authority vested in the Council as the joint controller under Section 38 of An Garda Síochána Act 2005, Data Protection Acts 1988-2018 (as amended).
- Article 6(1) (f) of the GDPR - the processing is necessary for the purposes of the legitimate interests pursued by Limerick City and County Council, e.g. in protecting its property and goods and maintaining the safety of persons using its buildings and environs.
- Waste Enforcement Act 1996, as amended (Section 14A) by the Circular Economy and Miscellaneous Provisions Act, 2022.
- Litter Pollution Act 1997, as amended (Section 23A) by the Circular Economy and Miscellaneous Provisions Act, 2022.
- The Local Authorities (Traffic Wardens) Act 1975

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?

To process a CCTV access request, it will be necessary for the requestor to submit their own photographic ID in order to ensure that it matches with that on the CCTV recordings. Images of individuals, vehicle registration numbers and images of activities carried out by individuals may be captured in the undertaking of this activity. If the image is of such poor quality so as not to clearly identify an individual, that image may not be considered to be personal data and may not be released by the Council.

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:

Data will only be shared with third parties where the Council has a lawful basis to do so and only in accordance with the Council's CCTV policy. Access may be provided to the following:

- A Data Subject
- An Garda Síochána

- CCTV Officers of the Council
- Waste Enforcement Officers/Litter Wardens of the Council
- Other third parties where appropriate i.e. the Council's insurers and/or legal advisors
- Monitoring Service Provider and IT Support/Maintenance Providers
- Other parties where the data subject gives his/her consent or instructs us to do so or where we are otherwise legally required to do so (e.g. on foot of a Court Order)

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):

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

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 into 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):

Data recorded on CCTV systems shall be kept for no longer than is considered necessary in accordance with Article 5(1) (e) of the GDPR. CCTV footage will not be retained by Limerick City and County Council beyond a maximum of 28 days, except in circumstances where the data is required for evidential purposes and/or legal proceedings or in response to a data subject access request, in which case it will be retained for longer than 28 days.

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

Personal data is not required to carry out this activity. However, personal data may be captured in recordings. If an individual requests access to their personal data, a photographic image will be required to verify their identity. The Council will be unable to process the request if this personal data is not provided.

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
6 Pembroke Row
Dublin 2
D02 X963
Ireland