



South Dublin County Council (SDCC)

Privacy Statement for CCTV Surveillance on Council Premises

This Privacy Statement applies to the CCTV surveillance systems located at County Hall, Tallaght, and Clondalkin Civic Offices, which are public office buildings operated by South Dublin County Council (SDCC). These systems are implemented to enhance the safety and security of both the facilities and their users / visitors. This privacy statement provides you, the data subjects, with all necessary information regarding the purpose, type, and scope of data processing conducted by the Council, as well as details about your rights concerning this processing.

- In **Section 1** you can find contact details for **SDCC as the Data Controller** responsible for processing your Personal Data.
- In **Section 2** the **purpose for processing your personal data** is explained.
- In **Section 3** you can find information about the **transfer of data to third countries**.
- In **Section 4** you can find information about **how long your personal data is stored**.
- In **Section 5** you can find information about **your rights**.
- In **Section 6** the **terminology used in this Privacy Statement** is explained.
- In **Section 7** you can find information about the **validity of and changes** to this Privacy Statement.

1. The Data controller

- a. The body responsible for processing personal data in this respect is:
South Dublin County Council
County Hall Tallaght,
Dublin 24, D24 A3XC
Phone: +353 1 414 9000
Email: info@sdublincoco.ie
- b. The Data Protection Officer for South Dublin County Council is:
Data Protection Officer
South Dublin County Council
County Hall Tallaght,
Dublin 24, D24 A3XC
Phone: +353 1 414 9000
Email: dataprotection@sdublincoco.ie

2. Processing your Personal Data

Purpose and Lawful Basis for Processing:

The CCTV systems at County Hall and Clondalkin Civic Offices are strategically deployed to monitor public and restricted areas, with the primary aim to ensure safety and secure the premises. The legal basis for processing this data rests in the lawful obligation of South Dublin County Council to ensure personal safety and protect the health and safety of their staff, contractors, and visitors. This is in exercise of the Council's official authority vested by the Safety, Health and Welfare at Work Act 2005 and the Occupiers' Liability Act, 1995 and 2023. Consequently, the processing of data via these CCTV systems is fundamentally to comply with legal obligations (Article 6(1)(c) GDPR), which mandate the Council to ensure the safety of the facility for its users, staff members, and visitors. All operations are conducted in strict adherence to the SDCC CCTV Policy (2024).

Type of Data Processed:

We process continuous video footage capturing the public, semi-public, and restricted areas within the premises. This footage is monitored in real-time and is used primarily for safety and security purposes.

Data Processors

We will process your Personal Data through service providers to help us in monitoring this facility. Service providers are so called "Data Processors" and the categories of service providers we use include IT software (for emailing, retaining data, analysing assessment data etc.), hosting providers and CCTV maintenance and administration contractors. The Council always concludes a Data Processing Agreement with all service providers to contractually ensure that any personal Data processed on our behalf by such Data Processors is processed in strict accordance with the Data Protection Acts, the EU General Data Protection Regulation, and only in accordance with our strict instruction. Information about the duration of storage of any personal data submitted can be found in Section 4 below.

3. Data Transfers to Third Countries

The Council takes every effort to ensure that your personal data is processed in the EU or in the European Economic Area. In cases where this is not possible and data needs to be transferred to a country outside of the EU, we will ensure, after prior review, that an adequate level of data protection that meets the requirements of the Court of Justice of the European Union and the EU Commission is adhered to in the country the data is transferred to and that a suitable transfer mechanism in accordance with Article 44 of the EU GDPR is in place.

4. Data Retention and Deletion

Personal Data is stored only for the duration necessary to fulfil the purpose of processing or as legally required as indicated in the national retention schedules.

CCTV footage is retained for 28 days, after which it is automatically deleted, unless needed for further review or investigations pursuant to incidents. This period is in line with the SDCC CCTV Policy, which adheres to data minimization principles. Automated systems ensure the automatic deletion of data.

5. Your Rights

As the data subject you have the following rights in relation to Personal Data processed by us for this purpose:

- Right of access (Art. 15 GDPR)
- Right to rectification (Art. 16 GDPR)
- Right to erasure ("right to be forgotten") (Art. 17 GDPR)
- Right to restriction of processing (Art. 18 GDPR)
- Right to data portability (Art. 20 GDPR)
- Right to object (Art. 21 GDPR)
- Right to withdraw consent (Art. 7 (3) GDPR)
- Right to lodge a complaint with a supervisory authority (Art. 77 GDPR)

Please submit your request to dataprotection@sdublincoco.ie and specify that you are seeking to exercise your rights in relation to the CCTV operations on council premises.

Please note, that we are obligated to verify your identity when processing a Data Subject Request. Your request will be retained by the Council for two (2) years. Any copies of proof of identity that we receive will be immediately destroyed after your identity has been verified. The legal basis for this processing is Art. 6 (1) (c) GDPR.

6. Terms Defined

The terminology used in this Privacy Statement has specific meanings defined in the EU General Data Protection Regulation (GDPR). Other terms which we explain below, along with the most important terminology from the General Data Protection Regulation:

- **"Data Controller"** means an individual or legal entity, public authority, agency, or other body that, either alone or jointly with others, decides on the purposes and means of the processing of personal data. In the context of this Privacy Statement this is South Dublin County Council.
- **"Data subject"** means an identified or identifiable natural person to whom personal data can be attributed. In the context of this Privacy Statement, this is you.
- **"Data Processor"** means a natural or legal person who processes personal data on behalf of the controller.
- **"Data Protection Acts"** refers to The Data Protection Acts 1988-2018.
- **"GDPR"** refers to the General Data Protection Regulation (EU) 2016/679
- **"Processing"** means any operation or set of operations performed in connection with personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise making available, alignment or combination, restriction or erasure.

7. Changes to this Privacy Statement

This Privacy Statement is valid from April 2024 and will be reviewed at regular intervals and updated as necessary.