**Parish CCTV Procedure**

The Parish of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ is committed to protecting your privacy. This CCTV procedure explains our data processing practices in relation to CCTV.

CCTV (Closed Circuit Television) captures images of identifiable living people (Data Subjects), for security purposes. This identifiable imagery is considered as personal data under GDPR and therefore from a data protection perspective, requires the same level of care that is given to paper and electronic personal data.

A surveillance camera system includes;

1. Closed Circuit Television
2. Any other system for recording or viewing visual images for surveillance purposes
3. Any systems for storing, receiving, transmitting, processing or checking images or information obtained by a system failing in (a) or (b) above.
4. Any other system associated with, or otherwise connected with systems failing in (a), (b) or (c) above.

**Purpose of CCTV in the Parish**

Under GDPR Regulations, the processing of Personal Data needs to be lawful, fair and transparent. CCTV in our Parish is for security purposes only

**Informing Data Subjects about CCTV**

Our parishioners, staff, volunteers, visitors who are all data subjects are informed of the existence of cctv by placing signs near entrances and other areas where cctv cameras are located. These signs are easy to read and contain the name of the security operator and their contact details. The CCTV sign clearly states that the purpose of the cctv is for security purposes only.

**Storing of CCTV data**

CCTV images are captured onto a secure server which is only accessible to the Parish Priest or those whom the parish priest has authorised access for security purposes. Images are deleted every \_\_\_\_\_\_\_\_\_\_\_\_\_days.

An Garda Siochana are allowed to view cctv footage if a crime has been committed and this does not pose any data protection issue. In situations where a crime has been committed, the images may need to be retained longer as evidence. If a copy of images is requested by An Garda Siochana, they must provide a written authorisation by the Local Superintendent. For practical purposes, and to expedite a request speedily in urgent situations, a verbal request may be sufficient to allow for the release of the footage sought. However, any such verbal request should be followed up with a formal written request This ensures the chain of evidence is not compromised if images are needed for legal purposes.

Storage or access to cctv images is considered processing personal data, so it is imperative that the parish and security operators (if applicable) uphold the integrity and confidentiality of the footage captured. Screens displaying live or recorded footage should only by viewed by authorised individuals and not be visible to members of the public.

Back up tapes/disks are stored in a secured environment with an access log maintained and access should be restricted to authorised personnel only. If back ups are cloud based, the parish will ensure that the cloud data centre is based in the EU.

**Your Rights as a Data Subject**

As with any aspect of personal data, data subjects have a right to access any images captured of them. The person must complete a Subject Access Request Form which will require a form of personal identification (Forms available from the Parish Priest) and as much information as possible should be gathered from the individual regarding dates, times when their image may have been captured. The Parish and security operators (if applicable) will need to ensure that the data requestor is present in the footage and that in supplying the footage that they do not disclose any personal data of another data subject. This may involve blurring parts of the footage such as other persons or licence plates. The Parish will endeavour to respond to your request for cctv footage within **30 days** from receipt of the Subject Access Form and an appropriate form of identification enclosed.

