



Atlantek CCTV Data Protection Policy

This Policy will be made freely available for both staff and Customers of Atlantek Computers Teoranta. A copy is available on our website and in our office.

Atlantek Computers Teoranta, as the data controller, has a registered address at Atlantek Computers Teoranta, Rossport, Ballina, Co Mayo. Companies Registration Number 291097.

Atlantek Computers Teoranta provide computer sales/services for I.T. hardware and software in addition to the provision of broadband and CCTV products/services.

Atlantek Computers Teoranta telephone number: 09723019. If you have a question or concern regarding the impact on your privacy due to the use of CCTV, please contact Atlantek at info@atlantek.net, by telephone or at the above address.

Legal Basis for Processing

The legal basis for processing is public interest, security, safety, health, wellbeing, and environmental protection i.e., creating a safe, and secure environment for the public, visitors, and staff of Atlantek Computers Teoranta. Personal data maybe record during the process. Personal data' is any data that relates to an identifiable living individual. The definition of 'processing' of personal data includes collecting, recording, storing, adapting, using, disclosing, and deleting data.

Compliance

Closed Circuit Television System (CCTV) has been in place since 2022 and complies with Irish security regulations. This policy was last reviewed and updated in May 2022 following on from a Data Protection Assessment (DPA).

The outcome of the DPA was to ensure our CCTV system did not compromise the privacy of any individual. The organisation wishes to ensure that the use of CCTV is in line with requirements under Irish Data Protection regulations.

Why we collect data

Atlantek Computers Teoranta provide I.T. services throughout Ireland. We collect data to support the delivery of the service and the safe, legal, and appropriate use of the service, facility, and the environs.

We collect data for the following reasons with respect to our CCTV Services:



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- to encourage a safe and healthy environment for service users and staff alike
- to detect and deter crime
- to inform investigations
- to monitor service demand
- to identify inappropriate use of services / service area
- to respond to correspondence

Responsibility & Restricted Access

Overall responsibility for the organisation's CCTV system lies with our General Manager/Privacy Officer. Access rights to CCTV footage has been assigned to a restricted number of personnel who have been appropriately trained to view, playback and download footage. Otherwise, there is no access to the CCTV system and recorded material by Atlantek Computers Teoranta staff.

The restricted number of staff with responsibility for processing CCTV images must **only** do so following authorisation from the General Manager/Privacy Officer and must always ensure the security of the data. Any employee who uses the CCTV system or CCTV images in an unauthorised manner may be subject to disciplinary action up to and including dismissal. All employees have a responsibility to adhere to this policy.

Retention

Recorded images are retained 31 days from the date of recording. However, the organisation reserves the right to retain images for a longer period where there are objective reasons for doing so such as a written request from An Garda Siochana and/or Environmental Enforcement Agency or we have received a Subject Access Request to view footage.

Subject Access Request

All individuals have the right to access images containing their personal data. This applies equally to staff and members of the public. We would request that all requests to view footage is made in writing and addressed to General Manager/Privacy Officer. Careful consideration must be given to requests for access that would involve disclosing images of other individuals. Individuals requesting access to images must supply the organisation with the following:

- adequate information for the images to be located
- sufficient information/justification to verify a legitimate right to request access
- proof of identification, if necessary



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Individuals should specify whether they would be satisfied with merely viewing the images rather than requiring a copy. A request in relation to what personal data is stored will be responded to within 15 days explaining whether such data is kept and, if so, giving a description of the data and the purpose of keeping it. A copy of the personal data of the individual will be supplied within 30 days of the request.

Due to the anonymity we offer visitors and our strong privacy culture, there will be occasions that a request will be denied. On these occasions, we will log the request, purpose of request and reason for refusal. Then inform the individual of the reason. The data subject has the right to dispute this decision with the Irish Data Protection Commission.

Unauthorised Processing

Unauthorised use is any processing incompatible with the data's original purpose including, but not limited to:

- disclosure of images containing personal data to an unauthorised third party, including other employees
- unauthorised processing of personal data in the form of copying the images on to a disk, website or print format
- circulation of images containing personal data by email or posting of images containing personal data on the internet
- access to and disclosure of images to third parties
- access to and disclosure of images recorded by the CCTV system is carefully restricted with limited access. Some circumstances for disclosure may include: -
 - prevent, and investigate offence
 - prevent injury or damage to property
 - meet legal requirements
 - obtain legal advice, or for the purpose of legal proceedings
 - meet a request from, or with the consent of, the data subject, or a person acting on his or her behalf

Requests from An Garda Siochana and/or Environmental Enforcement Agency must always be followed up by a written request on headed paper confirming that An Garda Siochana and/or Environmental Enforcement Agency are investigating a criminal or environmental matter.



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Gardaí are permitted to view footage on the premises of Atlantek Computers Teoranta. The organisation also reserves the right to disclose personal information to specific third parties where there are objective business reasons for doing so. Such third parties may include: insurance providers or medical practitioners.

Third Party Processing

We have a Data Processing Agreement in place with security system provider. **PhoneWatch**.

Location & Signage

The organisation operates a number of CCTV cameras on a 24-hour basis, seven days a week. Adequate signage is placed in the vicinity of CCTV cameras to indicate that CCTV is in operation.

Notification & Dispute

A copy of this CCTV Policy is available to the public and staff through our website and at our office. We will only process your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data, please communicate in the first instance with our General Manager/Privacy Officer.

If you are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the Supervisory Authority (Data Protection Commission, 21 Fitzwilliam Square, Dublin 2, D02 RD28, Ireland.) if you believe that we have not complied with this CCTV Policy and the GDPR regulations about your personal data.