

KILLESHAL PRECAST CONCRETE LIMITED

SECURITY AND DASHCAM VIDEO PRIVACY POLICY

POLICY DESCRIBING THE
COLLECTION AND PROCESSING
OF VIDEO THROUGH CAMERAS
OPERATED BY
KILLESHAL PRECAST CONCRETE LIMITED

29 Apr 2021

John McCormack

Data Protection Officer
Killeshal Precast Concrete Ltd.
email: dpo@killeshal.com

Killeshal Precast Concrete Ltd.

Security and Dashcam Video Privacy Policy

Introduction

Killeshal Precast Concrete Limited (Killeshal) respects the right to privacy and is committed to its obligations under national legislation and the GDPR, which came into force on 25 May 2018.

Killeshal operate a number of on-site CCTV cameras as well as vehicle mounted cameras such as dashcams and the purpose of this Security and Dashcam Video Privacy Policy is to outline how Killeshal deals with any personal data recorded in video form.

The Data Protection Commission have produced a guideline document relating to Dashcam usage; that can be seen here:

[Guidance for Drivers on the use of Dash Cams.pdf \(dataprotection.ie\)](#)

Scope

This document relates to data recorded in video form through Killeshal's on-site CCTV security cameras and its vehicle-mounted cameras. This document further refers to the processing of such data by Killeshal Precast Concrete Limited.

Within this policy, and under GDPR, Killeshal is considered the Data Controller. The driver of the vehicle (in the case of on-vehicle cameras) and our external security service provider (in the case of monitored on-site security cameras) are Data Processors.

Notification of Video Recording and Monitoring

In compliance with the GDPR and the Data Protection Act 2018 Killeshal provide notification of the use of video recording and monitoring equipment.

This notification takes two forms:

- In regard to on-site security surveillance at Killeshal's facilities signage is provided at all entrances indicating that video surveillance is in use
- In regard to on-vehicle cameras notices are displayed on all Killeshal fleet vehicles that use on-vehicle cameras that video recording equipment is in use

In both cases, notifications will state how to access this policy thereby fulfilling our obligations with regard to transparency under data protection regulation.

Processing and Retention of Video Data

Video is recorded by our on-site and on-vehicle cameras for a number of purposes:

- To aid in the security of Killeshal's property on-site and off-site
- To provide a video record and video confirmation of facts should a dispute arise with regard to the delivery or collection of goods; or the actions of Killeshal employees, non-Killeshal personnel or members of the general public
- To provide a video record to relevant policing or other authorities where Killeshal receive a written request for such a record and where such a request can demonstrate the requirement for the video in investigating or prosecuting a criminal offence
- To provide a video record in the event of an accident for civil or criminal liability reasons, where Killeshal is satisfied that they have a legal basis to share the data and that any third party with which we share the data will restrict its use of the data to only what is necessary and will keep it secure and retain it no longer than is necessary

Video data will be processed by Killeshal and authorised third parties only with respect to the intended uses described above.

Access to such video data will be permitted only to specifically authorised personnel within Killeshal and, in the case of external security video service providers, to similarly authorised personnel within such third party organisations.

Video will only be retained for as long as is necessary in accordance with its intended purpose. Standard retention times are laid out in Appendix 1 of this document. Beyond these times, recorded video will be deleted, but as described earlier in this document, there may be legal reasons under which Killeshal may wish to or may be required to retain video for longer periods.

Disclosure of Information to Third Parties

Recorded video may be disclosed to third parties in specific circumstances only:

- Recorded video will not be posted to social media or other media platforms where such video will infringe upon the privacy rights of any person in the video
- As indicated earlier in this document Killeshal may provide video to police or other authorities where Killeshal receive a written request for such a record and where such a request can demonstrate the requirement for the video in investigating or prosecuting a criminal offence
- As indicated earlier in this document Killeshal may provide video in the event of an accident for civil or criminal liability reasons, where Killeshal is satisfied that they have a legal basis to share the data
- Both on-site video cameras and in-vehicle video cameras transfer video data to external operators (third party companies) and in this regard these companies are considered Data Processors. The companies providing these services are legally required to be compliant in all aspects of data protection regulations, including the requirements to process data only as legally requested to do so and to retain data only for as long as can be legally justified

Neither drivers nor other Killeshal employees, nor any third party data processor will provide video to any other person or organisation without the express permission of Killeshal.

Your Rights in Relation to Your Data

You have rights with regard to how your personal data is acquired, processed and stored. Killeshal is committed to fully honouring these rights. GDPR requires that data be:

- Processed lawfully, fairly and in a transparent manner
- Collected for specific, explicit and legitimate purposes
- Adequate and relevant and limited to what is actually necessary
- Accurate and up-to-date
- Retained only for as long as is necessary
- Processed and maintained securely

Access to Information

As a Data Subject you have the right to confirmation as to whether we process your personal data and, where we do process your data, you may make a request at any time to access your data, as well as to how we process it and why.

A formal request by a Data Subject for access to their personal data (a Subject Access Request) will be referred to the Data Protection Officer and will be then be processed as soon as possible. Requests should be addressed to the Data Protection Officer.

Note- the rights of the requestor must be balanced with the rights of others and in this regard persons other than that individual may be redacted from the requested video.

Our Contact Details

Phone: Freephone (UK Only) 0800 039 3367
Ireland 057 9353018
Email: dpo@killeshal.com

You may also use the contact form on the [Contact Us](#) page of this site.

The Data Protection Officer is:

Name: John McCormack
email: dpo@killeshal.com
phone: 057 9353018

Document Signatories

This document is brought into effect by the signatories below, on the date indicated beside the signature of the Managing Director

Data Protection Officer

Date

CEO

Date

Appendix 1

Video Data is stored in encrypted format and is inaccessible without the appropriate licensed software.

Video will be available for approximately 30 days for on-site video footage and for 2 weeks for dashcam footage.

A low quality dashcam video will be available on our hard drive for a period of up to 6 months but will then be over-written by new footage.

Beyond these times, recorded video will be deleted.

Please note, as described earlier in this document, there may be legal reasons under which Killeshal may wish to or may be required to retain video for longer periods.