

Dungannon Golf Club CCTV Privacy Policy

1. Purpose of This Policy

Dungannon Golf Club operates a Closed-Circuit Television (CCTV) system for the purposes of security, crime prevention and detection, and the protection of our staff, members, visitors, and property. This policy explains how CCTV footage is collected, used, stored, and protected, in line with applicable data protection legislation.

2. Legitimate Basis for CCTV Use

The lawful basis for operating CCTV at Dungannon Golf Club is **legitimate interest**.

The CCTV system is used solely for: -

- Ensuring the safety and security of staff, members, and visitors
- Preventing, detecting, and investigating crime or anti-social behaviour
- Protecting club property and assets

The CCTV system records **images only. No audio or sound is recorded at any time.**

CCTV is not used for monitoring staff performance or for any purpose incompatible with those listed above.

3. Location of Cameras

Cameras are positioned in and around club premises in locations that are necessary for security purposes. Cameras are sited to avoid, as far as reasonably possible, capturing private areas or intruding unnecessarily on individuals' privacy.

Clear signage is displayed to inform individuals that CCTV is in operation.

4. Access to CCTV Footage

Access to recorded CCTV footage is strictly controlled and limited to the following authorised individuals only

- The General Manager
- The Honorary Secretary

Footage will only be accessed where necessary for the purposes outlined in this policy.

5. Use and Disclosure of Footage

CCTV footage will not be shared with third parties unless:

- It is required for the prevention or detection of crime
- it is requested by law enforcement or other statutory authorities
- there is a legal obligation to do so.

Any disclosure will be limited to what is strictly necessary.

6. Retention of Footage

CCTV footage is retained for a maximum period of **30 days**. After this period, footage is automatically and securely deleted.

Footage may be retained for longer than 30 days only if it is required for an ongoing investigation or legal proceedings and will be deleted once it is no longer required.

7. Data Security

Dungannon Golf Club takes appropriate technical and organisational measures to protect CCTV footage against unauthorised access, loss, alteration, or disclosure. Access is password-protected and restricted to authorised personnel only.

8. Individual Rights

Individuals whose images are captured by CCTV have rights under data protection law, including the right to request access to their personal data (subject access request). Requests must be made in writing and may require proof of identity. If someone requests copies of their own personal data, any third party data will be redacted from the footage where necessary.

Requests will be handled in accordance with applicable data protection legislation and within statutory time limits.

9. Complaints

Any concerns or complaints regarding the use of CCTV at Dungannon Golf Club should be directed to the Secretary / Manager in the first instance.

10. Policy Review

This policy will be reviewed periodically to ensure it remains compliant with legal requirements and reflects best practice.