



Dundalk Institute of Technology

CCTV Policy

Version 3.0

Internal Use Only

Revision History				
Version	Date	Classification	Owner	Summary of Changes
V 1.0			DkIT Estates Office	
V 2.0	November 2024		DkIT Estates Office	
V 3.0	March 2026	Public	DPO	Added overview, purpose, scope, data subject rights, policy compliance, appendices, updated definitions, retention, access request procedures.

Approval

This document requires the following approvals:

Name	Title	Approval Date
Executive Board	Executive Board	29.04.26
Audit, Risk & Compliance Committee	Governing Body	09.07.26
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1. Overview

Data Controller

This section sets out information about Dundalk Institute of Technology (DkIT) as a data controller.

1.1 Dundalk Institute of Technology is the data controller.

Address and contact details are:

Dundalk Institute of Technology,
Dublin Road,
Dundalk,
Co. Louth
A91 K584

Telephone: 042 93 70200

Email: info@dkit.ie

1.2 The Principal Role of Dundalk Institute of Technology

The principal role of Dundalk Institute of Technology is, subject to the provision of the Regional Technical Colleges Act, 1992,

“To provide vocational and technical education and training for the economic, technological, scientific, commercial, industrial, social and cultural development of the State with particular reference to the region served by the college, and, without prejudice to the generality of the foregoing, a college shall carry out the functions as described in Section 5 (1) of the Regional Technical Colleges Act, 1992 (See p.5 of the Act)”

The main activities of DkIT are: -

- Provision of education at Third Level, Adult Education and Further Education;
- Engage in research, consultancy and development;
- Quality Assurance of services and courses provided;
- Governance, policy formulation, policy implementation and appropriate monitoring;
- Resource and Budget allocation and appropriate monitoring;
- Promote and sustain arrangements with other institutions in or outside the State, for the purpose of offering joint courses of study;
- Promote and sustain arrangements with other institutions in or outside the State, for the purpose of engaging jointly in programmes of research, consultancy, and developing work as deemed appropriate by the Governing Body;
- Ensuring public accountability for the stewardship of the and the use of resources to the Department of Education and Skills and to all relevant Government agencies.

Established in 1971 and located in Dundalk, County Louth, Ireland DkIT has become a prominent centre for higher education, research and innovation along the Belfast-Dublin corridor. DkIT offers a wide range of programs including undergraduate and post graduate courses and is committed to providing high-quality education enhancing its status as a significant educational institution in the region.

DkIT's teaching and research experience is divided across four Academic Schools of Business & Humanities; Engineering; Health & Science and Informatics & Creative Arts.

Further information can be found on the DkIT's website <https://www.dkit.ie/>

2. Purpose

DkIT has developed this CCTV policy to supplement its CCTV Privacy Notice, CCTV Guidance Document and Data Protection Policy. This policy is intended to ensure transparency and accountability in relation to the processing of personal data obtained through CCTV systems.

3. Scope

3.1 CCTV Recordings and Legal Basis

This CCTV policy applies to all premises either owned or controlled by DkIT, including DkIT Sport.

In this section, DkIT provides you with information about why it uses CCTV, the type of CCTV images it collects, what DkIT does with CCTV recordings/images, and the lawful basis relied upon.

DkIT uses CCTV systems on its premises, both within buildings and outside of them.

The cameras are fully operational and are either fixed cameras or cameras with pan, tilt and zoom facilities (PTZ). These PTZ cameras are in fixed position only. However, should an authorised user move a camera from its fixed position, these cameras have been pre-programmed to return to the fixed position after a period of one minute non-use.

Images are color and a mixture of Standard Definition (SD) and High Definition (HD)

The system is operated from a main control center in the North Building and a secondary control center in the PJ Carroll Building. These control rooms are linked using a separate fiber link from the main campus network.

For the avoidance of doubt, CCTV monitoring/profiling of an individual based on any of the following characteristics is prohibited by this policy:

- Age;
- civil status;
- disability;
- family status;
- gender;
- membership of the traveller community;
- race;
- religion;
- sexual orientation.

CCTV will be utilised in a responsible and proportionate manner. Cameras will be placed where they are least intrusive, to protect the privacy of individuals. Cameras shall be installed and positioned so as to prevent or minimise the recording of public areas/thoroughfares, of private property, and of areas where individuals would have an enhanced expectation of privacy, for example, bathroom cubicles, changing rooms. See Appendix 3 for location of CCTV.

CCTV will not normally be placed in classrooms, staffrooms, staff canteens, offices, bathroom circulation areas and washbasins etc. However, CCTV may be installed near to these areas in exceptional circumstances where it can be justified for reasons of, for example, security and student safety, subject to a data protection impact assessment (DPIA) and upon consultation with the Data Protection Officer (DPO) and the approval of the Executive Board of DkIT. Such CCTV must be clearly marked with signage in any area where CCTV recording is taking place. See Appendix 3 -Location of CCTV.

A Data Protection Impact Assessment (DPIA) shall be undertaken before making any decision to install a CCTV system, or before making adaptations to CCTV systems, especially the repositioning of existing cameras, the installation of new cameras or the incorporation of any automated recognition, detection or AI (Artificial Intelligence) - based technologies.

CCTV systems and CCTV footage will be protected by appropriate security measures, and access to systems and footage will be strictly controlled and limited to relevant personnel on a need-to-know basis.

Installation and servicing of CCTV systems will only be carried out by licensed private security authority (PSA) contractors.

Where CCTV is in operation, there will be a prominent sign on display notifying people of same, before they enter into an area where CCTV recording is taking place.

Within the area being filmed, there shall be a CCTV Privacy Notice displayed prominently containing at a minimum the information set out in the template at Appendix 1 below.

‘Dummy’ cameras do not record data subjects, and as no data processing occurs, they fall outside the scope of this policy.

Covert surveillance (i.e., where the data subject is unaware that they’re being filmed), must only be implemented in strictly exceptional cases, for the purposes of preventing, detecting or investigating serious offences, or apprehending or prosecuting offenders. It must not be considered without the active prior involvement of An Garda Síochána or other prosecutorial authority. Any decision to install covert cameras shall be subject to a DPIA and must only be taken as a last resort after the full exhaustion of all other available investigative steps. A careful balance must be struck between the urgency of the matter under consideration, and the rights to privacy of data subjects. The reason and justification for the covert surveillance, and details of the procedures, measures and safeguards that will be implemented while this type of surveillance is ongoing must be clearly documented.

Permission from the President must also be obtained before installation of any covert recording device, and in the event of any doubt, legal advice must be obtained.

The use of mobile phones to record or take images of any CCTV footage is not permitted. Requests for CCTV footage from any authority or requester should be processed as per this policy. Please refer to DkIT's CCTV guidance document for assistance.

3.2 Purposes of CCTV and the Legal Basis

The purposes of CCTV and the legal basis of same are set out below. Use of CCTV for a purpose not listed below, or for a purpose incompatible with a purpose listed below, must not commence without a prior DPIA and the approval of the Executive Board. Commencement of any new purpose so approved must be preceded by appropriate amendments to this policy, the CCTV Privacy Notice, and CCTV signage, where the revised purposes shall be clearly set out:

Purposes	Legal Basis
1. For Security. a) To deter unauthorised access to the DkIT's property; b) To protect the DkIT's buildings and assets (including but not limited to files and data relating to students and staff, both during class/work time and after hours); c) To capture images of those perpetrating criminal offences on the premises, including in the car-parking areas, main entrance, exit gates etc. This includes intruders or individuals damaging property or removing items without authorisation, so that the recordings can be passed to An Garda Síochána, and used for criminal prosecutions; d) To support An Garda Síochána and other civil authorities in detecting and deterring crime, and in identifying, apprehending, and prosecuting offenders; e) To reduce the incidence of crime and anti-social behaviour (including theft and vandalism); f) To assist in providing a safer environment and to enhance levels of safety and security for all users of the DkIT's property; g) To monitor activity in areas where cash is handled or where goods are received	Article 6 (1) (e) GDPR - Public Interests /Substantial public interests: To prevent and/or detect fraud, theft and crime, to ensure that the DkIT adequately protects property and assets purchased/financed/maintained from funds provided by the Oireachtas. Article 6 (1) (c) GDPR - Legal Obligation: DkIT's duty of care to its students, staff, and visitors to its premises under the Safety, Health and Welfare at Work Act 2005, and to conduct or assist in any post -incident investigation. Article 6 (1) (d) GDPR - Vital interests: The processing is necessary in order to protect the vital interests of the data subject or of another person in the event of a medical emergency or a significant threat to their health, safety and welfare. Article 23(1)(d) GDPR & s41(b) of the Data Protection Act 2018 - Legal Obligation: Processing for the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including the safeguarding against and the prevention of threats to public security, to

from couriers and/or service providers (e.g., reception, goods inwards), but balancing this requirement with the need to respect the privacy of staff working in the area; h) The monitoring of access control systems (e.g., keypads and swipe card readers), to prevent attempts at unauthorised access at entrances/exits to buildings and other areas so restricted; i) The checking of security alarm activations, intruder alarms, external alarms.	the extent that such processing is necessary and proportionate for the purposes.
2. To uphold DkIT's policies /procedures that promote safety and well-being. a) To ensure that DkIT's rules and policies on health and safety, security, behaviour and discipline are respected so that the DkIT can be properly managed. b) To deter any instances of bullying, harassment, and all other forms of unwanted and/or inappropriate behaviour. c) To ensure that DkIT's 'Code of Conduct' and 'anti -bullying procedures and all other relevant policies that apply to staff and students are implemented so that DkIT can be properly managed. For the avoidance of any doubt, this means that CCTV footage may be used as part of any of DkIT's procedures, including but not limited to a disciplinary, suspension, or expulsion process, under the code of Conductor under any staff policy relating to discipline or bullying/harassment prevention, and may be viewed by the Executive Board or Governing Body, together with any relevant external appeals bodies relevant to a suspension or expulsion process.	Article 6 (1) (c) GDPR - Legal Obligation: DkIT's duty of care to its students, staff, and visitors to its premises under the Safety, Health and Welfare at Work act 2005; to implement the Code of Conduct, and, where CCTV is relevant to a Code of Conduct process, to facilitate the hearing of appeals. Article 6 (1) (d) GDPR - Vital interests: The processing is necessary in order to protect the vital interests of the data subject or of another person in the event of a medical emergency or a significant threat to the subject's health and safety. Article 6 (1) (e) GDPR - Public Interest s/Substantial public interests: To maintain discipline and good order, to ensure that students do not have their learning seriously disrupted by the misbehaviour of other students, or that staff do not similarly have their work disrupted. To ensure that other students and staff are not exposed to risks to their health and safety, including causing distress, anxiety, or any threat to physical safety. To prevent and/or detect fraud, theft and crime, to ensure that DkIT adequately protects property and assets.

3. For verification and dispute -resolution purposes. Particularly in circumstances where there is a dispute as to facts and the recordings may be capable of resolving that dispute.	Article 6 (1) (e) GDPR - Public Interests/Substantial public interests: For example, to prevent and/or detect fraud, to ensure that facts can be objectively verified to avoid disputes leading to costly litigation. For dispute resolution and litigation purposes.
4. For litigation purposes.	Article 6 (1) (e) GDPR - Public Interests/Substantial public interests: To ensure that all relevant data is available for litigation purposes, to ensure the effective administration of justice.
5. For verification and dispute -resolution purposes as part of any investigation. Including internal disciplinary processes and, where appropriate, external investigations or legal proceedings, such as those involving An Garda Síochána, Tusla, or other relevant statutory or regulatory bodies.	Article 6 (1) (c) GDPR - Legal Obligation: Where required, DkIT may process or disclose CCTV data in order to comply with a legal obligation. This may include requests from external bodies as part of lawful investigations, such as: • Child protection matters – where DkIT is required to assist Tusla in accordance with the Children First Act 2015 and related child safeguarding obligations; • Law enforcement and criminal investigations – where disclosure is made to An Garda Síochána for the prevention, investigation, detection, or prosecution of criminal offences, or where otherwise required by law; • Court orders or other legally binding requests from competent authorities. Article 6 (1) (d) GDPR - Vital interests: Processing or disclosure is necessary in order to protect the vital interests of the data subject or of another person in the event of a medical emergency or a significant threat to the subject's health, safety and welfare. Article 6 (1) (e) GDPR - Public Interests/Substantial public interests: Processing may be necessary for the performance of tasks carried out in the public interest or in the exercise of official authority vested in DkIT. This may include the prevention, detection, and investigation of fraud, theft, criminal activity, or other

	incidents affecting the security of DkIT's property, assets, staff, students, or property.
Please Note: This is an indicative, non-exhaustive list. DkIT will utilise CCTV for purposes not necessarily listed here, provided there is a clear and sound legal basis for doing so, having firstly considered the factors listed at Article 6(4) of the GDPR for determining whether the new purpose is compatible, supported by a DPIA if required, and/or DkIT are legally required to do so.	

3.3 Recipients of CCTV recordings

DkIT share and transfer CCTV recorded data with other data controllers and recipients. In this section DkIT provides further information about the recipients or categories of recipients of the personal data.

3.3.1 Parents/guardians:

Where the student is under 18 years of age, DkIT may show CCTV footage to the student's parent/guardian, as long as the images can be appropriately redacted/pixelated to conceal the identity of third parties, e.g., other students (for example, as part of a Code of Conduct process).

3.3.2 An Garda Síochána:

For the investigation, detection and prevention of offences in response to requests made under s41(b) of the data protection act 2018. *See Appendix 2 for An Garda Síochána Request Procedure.*

3.3.3 To social workers, HSE, and/or Tusla:

In respect of any child protection and/or child safeguarding and/or child welfare matter.

3.3.4 Student support team/pastoral care team:

Where relevant, CCTV recordings may be used for any post-event reflective training for staff to improve interactions, learning outcomes and to support positive behaviour for the student/s involved. In these circumstances footage specifically used for this purpose must not be thereafter used as a component of general training, and must be deleted in compliance with DkIT's record retention schedule.

3.3.7 Bodies such as DkIT's insurer and/or legal advisors, the Health and Safety Authority.

DkIT transfers and shares CCTV recordings with its insurers, Irish Public Bodies and their duly appointed workplace investigators, claims handlers etc.

DkIT also shares/transfers CCTV data to its legal advisors. These transfers are for the purposes of obtaining legal advice, resolving disputes, and defending, compromising or otherwise settling litigation.

CCTV data may also be transferred to the Health & Safety Authority when investigating workplace accidents.

3.3.8 CCTV administrators, maintenance contractors, and IT support staff.

To assist with the administration and maintenance of the CCTV system and associated hardware and software, DkIT may on occasion need to transfer footage to outside bodies with particular technological expertise to assist in essential processing, e.g., companies that specialise in extracting and/or pixelating CCTV footage. An appropriate Data Processing Agreement/addendum shall be put in place with any such third -party processor.

3.3.9 Other Parties

Where you provide your consent or instruct DkIT to do so (e.g., to your solicitor, to your union representative etc.), or where DkIT are otherwise legally required (e.g., in compliance with a court order).

4. Definitions

Data Controller	Article 4 (7) GDPR defines Data Controller as ‘ <i>controller</i> ’ means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;
Data Processor	Article 4 (8) GDPR defines Data processor as ‘ <i>processor</i> ’ means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
Data Protection Commission (DPC)	Article 51 (1) GDPR Each Member State shall provide for one or more independent public authorities to be responsible for monitoring the application of this Regulation, in order to protect the fundamental rights and freedoms of natural persons in relation to processing and to facilitate the free flow of personal data within the Union (‘supervisory authority’). The DPC is the Irish supervisory authority for the General Data Protection Regulation (GDPR), whose principal administrative offices are at The Office of the Data Protection Commissioner, 6 Pembroke Row, Dublin 2, D02 X963 Ireland.
DPIA	Article 35 (1) GDPR states ‘Where a type of processing in particular using new technologies, and taking into account the nature, scope, context and purposes of the processing, is likely to result in a high risk to the rights and freedoms of natural persons, the controller shall, prior to the processing, carry out an assessment of the impact of the envisaged processing operations on the protection of personal data. 2A single assessment may address a set of similar processing operations that present similar high risks.’
Data Subject	A “data subject” is defined by Article 4 (1) GDPR as an “ <i>identified or identifiable natural person</i> ” from whom or about whom information is collected.

GDPR (General Data Protection Regulations)	This Regulation lays down rules relating to the protection of natural persons with regard to the processing of personal data and rules relating to the free movement of personal data. This Regulation protects fundamental rights and freedoms of natural persons and in particular their right to the protection of personal data. The free movement of personal data within the Union shall be neither restricted nor prohibited for reasons connected with the protection of natural persons with regard to the processing of personal data.
Personal Data	Article 4 (1) GDPR defines Personal Data as <i>‘personal data’ means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;</i>
Profiling	Article 4 (4) GDPR defines Profiling as <i>‘profiling’ means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person’s performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements; is any kind of automated processing of personal data that involves analysing or predicting your behaviour, habits or interests.</i>
Processing	Article 4 (2) defines processing as <i>‘processing’ means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;</i>

5. Third country/International transfers

Where DkIT engages service providers located in, or transfers personal data to, third countries or international organisations (i.e., outside the European Economic Area), such transfers will be carried out in compliance with the General Data Protection Regulation (GDPR). DkIT will ensure that appropriate safeguards are in place to protect the security and integrity of personal data. Where adequate safeguards cannot be implemented, DkIT will not engage such service providers or transfer personal data to them.

6. Automated decision making/profiling

DkIT does not engage in automated decision-making or profiling. Any data or footage captured by its CCTV system is reviewed and interpreted by an authorised member of staff of DkIT before any conclusion is drawn or any decision is made in relation to that data or footage.

7. Record Retention

CCTV may be retained for a maximum period of 30 days; however, this may be shorter depending on the location, and/or the discretion of the Executive Board. A longer retention period may be used if required as part of an ongoing investigation, Data Subject Access Request, request from An Garda Síochána, insurance claim, etc.

8. Your Rights

You can exercise your rights in relation to your personal data that is processed by DkIT. You have:

1. **the right to be informed** if how and why your personal data are processed;
2. **the right to access** your personal data and obtain a copy of it;
3. **the right to have your data corrected** or supplemented if it is inaccurate or incomplete;
4. **the right to have your personal data deleted or erased**;
5. **the right to limit or restrict** how your data are used;
6. **the right to data portability**;
7. **the right to object** to processing of your personal data;
8. **the right not to be subject to automated decisions** without human involvement, where it would significantly affect you.
9. **The right to make a complaint** in respect of our compliance with Data Protection Law to the Office of the Data Protection Commission (DPC).

It is important to note that these rights are not absolute, and are subject to a number of limitations and restrictions. Certain rights apply to all processing activities, such as the right to information or to access to personal data, whereas other rights only apply in certain circumstances, such as the rights to erasure, restriction, portability, and objection. Both the GDPR and the Data Protection Act 2018 set out limitations and restrictions on these rights.

More information is available on how you can exercise your rights on the Data Protection Commission website at the following link - [Your Data](#)

9. Data Protection Officer

Under the GDPR, a public authority or body is required to appoint a designated Data Protection Officer (DPO).

If you have any queries about CCTV or this policy, please contact DkIT's DPO.

Please see contact details in the table below:

Postal Address	Email	Telephone	DkIT Website
Data Protection Office Whitaker Building Dundalk Institute of Technology Dublin Road Dundalk Co. Louth A91 K584	dataprotection@dkit.ie	+353 (0)42 9431390	Link to location on website

10. Right to make a complaint

You have the right to lodge a complaint about how DkIT handles your personal data to the competent supervisory authority. Please see the contact details for the Data Protection Commission (DPC) in the table below:

Postal Address	Telephone	Online	DPC Website
The Office of the Data Protection Commissioner, 6 Pembroke Row, Dublin 2 D02 X963 Ireland	01 765 01 00, 1800 437 737	Contact Us Online	Data Protection Commission

11. Policy Compliance

11.1 Compliance

Compliance with this Policy will be monitored by DkIT and may be subject to periodic review, including both scheduled and random inspections.

Failure to comply with this Policy may result in data protection breaches under applicable legislation, as well as reputational damage to DkIT and potential infringement of the rights of employees, students, or other affected third parties.

The Data Protection Officer is available to provide guidance and practical assistance in relation to compliance with this Policy and any related data protection matters.

11.2 Non-Compliance

All policies require the participation of staff to be successful. Failure to comply with this policy may lead to disciplinary action been taken in accordance with DkIT's disciplinary procedures. Failure of a third-party contractor (or subcontractors) to comply with this policy may lead to termination of the contract and/or legal action.

Non-compliance shall be reported to the Data Protection Officer.

Appendix 1 – Dundalk Institute of Technology CCTV Privacy Notice



Dundalk Institute of Technology CCTV Privacy Notice

By entering the premises of Dundalk Institute of Technology (DkIT), you acknowledge that your images shall be processed by the CCTV system of DkIT. This Privacy Notice gives you some helpful information about who we are, what CCTV images we collect, why, who we share it with, how long we keep it, and your rights. If you need more information, please see our Data Processing Policy and/or our CCTV Policy available at www.dkit.ie

1. This privacy notice relates to Dundalk Institute of Technology. DkIT's address and contact details are:

Dundalk Institute of Technology, Dublin Road, Dundalk, Co. Louth, A91 K584.

Telephone: 042 93 70200, Email: info@dkit.ie Website: www.dkit.ie

DkIT is a leading higher education provider located in Dundalk, County Louth, Ireland. Established in 1971 DkIT has become a prominent centre for higher education, research and innovation along the Belfast-Dublin corridor. DkIT offers a wide range of programs including undergraduate and post graduate courses, DkIT is committed to providing high-quality education. DkIT's teaching and research experience is divided across four Academic Schools of Business & Humanities; Engineering; Health & Science and Informatics & Creative Arts.

Further information can be found on DkIT's website <https://www.dkit.ie/>

2. DkIT operates closed circuit television systems ("CCTV") on its premises 24 hours a day. CCTV is used at external points on the premises (e.g., at the campus vehicular entrances, entrances doors etc.) and at certain internal points (e.g., reception area, corridors etc.) In areas where CCTV is in operation, appropriate notices will be displayed. DkIT use CCTV for security purposes; to protect premises and assets; to deter crime and anti-social behaviour; to assist in the investigation, detection, and prosecution of offences; to monitor areas in which cash and/or goods are handled; to deter bullying and/or harassment; to maintain good order and discipline and to ensure the code of behaviour is respected; to provide a safe environment for all staff and students; for verification purposes and for dispute-resolution, particularly in circumstances where there is a dispute as to facts and the recordings may be capable of resolving that dispute; for the taking and defense of litigation. For further information on how DkIT use CCTV and the legal basis for same, please go to section 3 of DkIT's CCTV Policy available on the website at <https://www.dkit.ie/>. This CCTV Privacy Notice and the CCTV Policy should be read together with DkIT's Data Protection Policy, a copy of which is also available on the website at <https://www.dkit.ie/>.

3. DkIT can legally share CCTV footage in certain situations, including:
- With An Garda Síochána
-> for crime investigation, prevention, or legal requests
 - With its legal advisors
-> where there is a potential or actual legal dispute, where DkIT needs legal advice or where footage is required for court proceedings
 - With its insurance company
-> to assess liability, investigate claims, defend or settle legal actions
 - With third-party service providers
-> e.g., CCTV system maintenance companies (under strict data processing agreements)
 - Internally
-> for disciplinary procedures involving students or staff

These uses are standard under GDPR and Irish data protection law, as long as they're necessary, proportionate, and documented.

For further information on who DkIT share your data with, when and in what circumstances, and why, please see DkIT's Data Protection Policy which is available at <https://www.dkit.ie/>.

4. Where DkIT engages service providers based outside the European Economic Area (EEA), DkIT will ensure that any transfer of personal data is carried out in full compliance with the General Data Protection Regulation (GDPR), and that appropriate safeguards are in place to protect the data. If adequate protection cannot be guaranteed, DkIT will not engage such providers or transfer personal data to them.
5. DkIT does not engage in automated decision-making or profiling. All CCTV data and footage are subject to human review by an authorised member of staff, and no decisions are taken solely on the basis of automated processing.
6. CCTV recordings are retained for a period of 30 days. In certain circumstances, recordings may be retained for a longer period where necessary, for example:
- a. where a break-in, theft, or other criminal activity is identified, in which case the recordings may be retained and shared with An Garda Síochána and/or DkIT's insurers and legal advisors;
 - b. where an incident involving injury or accident occurs, in which case the recordings may be retained and shared, where appropriate, with DkIT's insurers, legal advisors, and relevant regulatory bodies such as the Health and Safety Authority;
 - c. where a suspected breach of DkIT policies or procedures arises involving a staff member or student, the recordings may be retained for the purposes of investigation and may be reviewed by authorised personnel and relevant DkIT committees or decision-making bodies in connection with disciplinary processes, appeals, dispute resolution, and verification, subject to appropriate safeguards such as redaction or pixelation to protect the personal data of third parties.

These examples are not exhaustive, and CCTV recordings may be retained for longer than 30 days in any circumstances where there is a lawful basis to do so and/or where DkIT is required to retain such data to comply with legal or regulatory obligations.

7. You have the right to exercise certain rights in relation to your personal data processed by DkIT, in accordance with the General Data Protection Regulation (GDPR). These rights include:
 1. the right to be informed if, how, and why your personal data are being processed;
 2. the right to access your personal data and obtain a copy of it;
 3. the right to have your personal data corrected or supplemented if it is inaccurate or incomplete;
 4. the right to have your personal data deleted or erased;
 5. the right to limit or restrict how your data are used;
 6. the right to data portability;
 7. the right to object to processing of your personal data; and
 8. the right not to be subject to automated decisions without human involvement, where it would significantly affect you.

It is important to note that these rights are not absolute, and are subject to a number of limitations and restrictions. Certain rights apply to all processing activities, such as the right to information or to access to personal data, whereas other rights only apply in certain circumstances, such as the rights to erasure, restriction, portability, and objection. Both the GDPR and the Data Protection Act 2018 set out limitations and restrictions on these rights.

More information is available on how you can exercise your rights on the Data Protection Commission website at the following link - [Your Data](#)

8. Under the GDPR, a public authority or body is required to appoint a designated Data Protection Officer (DPO).

If you have any queries about recording of data in the context of CCTV or this policy, please contact our DPO.

Please see contact details in the table below:

Postal Address	Email	Telephone	DkIT Website
Data Protection Office Whitaker Building Dundalk Institute of Technology Dublin Road Dundalk Co. Louth A91 K584	dataprotection@dkit.ie	+353 (0)42 94 31390	Link to location on website

9. Right to make a complaint

You have the right to lodge a complaint, about how DkIT handles your personal data, to the competent supervisory authority. Please see the contact details for the Data Protection Commission (DPC) in the table below:

Postal Address	Telephone	Online	DPC Website
The Office of the Data Protection Commissioner, 6 Pembroke Row, Dublin 2 D02 X963 Ireland	01 765 01 00 1800 437 737	Contact Us Online	Data Protection Commission

Appendix 2 – An Garda Síochána Access Requests Procedure



An Garda Síochána Access Requests

This document sets out how a member of An Garda Síochána can make a Data Access Request to Dundalk Institute of Technology (DkIT).

As a Data Controller DkIT has established this procedure to comply with the Data Protection Act 1988 – 2018 and GDPR 2018.

A “controller” is defined in the GDPR as:

“the natural or legal person, public authority, agency or other body which, alone or jointly with others determines the purposes and means of the processing of personal data.”

Section 41(b) of the Data Protection Act 2018 allows data controllers to disclose personal data to third parties for law enforcement purposes, provided such disclosure is necessary and proportionate in the circumstances.

Section 41(b) permits a data controller to disclose personal data to a third party for a purpose other than the original purpose for which it was collected, specifically for the prevention, detection, investigation, or prosecution of criminal offenses.

“Personal data” under Article 4(1) of the General Data Protection Regulation (GDPR) is defined as:

“Any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”

Footage or images containing identifiable individuals captured by CCTV ((Closed-Circuit Television) systems are personal data for the purposes of data protection law, and therefore this procedure also applies to any requests from An Garda Síochána for access to CCTV footage.

For accountability purposes a record of all An Garda Síochána requests will be maintained detailing any provision of footage or records.

Article 12(3) GDPR states:

“The controller shall provide information on action taken on a request under Articles 15 to 22 to the data subject without undue delay and in any event within **one month** of receipt of the request”

How can a member of An Garda Síochána make a Data Access Request?

All access requests from a member of An Garda Síochána should include the following:

1.	The request must be in writing on official Garda letterheaded paper;
2.	It must indicate that it is for the prevention, detection, investigation, or prosecution of a criminal offence,
3.	The request must state that it is made pursuant to section 41(b) of the Data Protection Act 2018,
4.	The request must be signed by a Garda of the rank of Superintendent, or above,
5.	It must include the requesting Garda's name and badge number,
6.	It must include the investigation pulse number.
7.	Additional information to allow DkIT to locate the data such as time periods, names, departments or areas of DkIT that are most likely to hold the relevant information. Please note that DkIT may seek further clarification from An Garda Síochána if enough detail has not been provided to enable DkIT to find the information sought.

All access requests should be sent to the following address/email:

Postal Address	Email	Telephone
Data Protection Office Whitaker Building Dundalk Institute of Technology Dublin Road Dundalk Co. Louth A91 K584	dataprotection@dkit.ie	+353 (0)42 9431390

Right of Appeal

If DkIT fails to comply with a valid Subject Access Request or if you are not satisfied with DkIT's handling of your request, you can make a complaint to the Data Protection Commissioner:

Postal Address	Telephone	Online	DPC Website
The Office of the Data Protection Commissioner, 6 Pembroke Row, Dublin 2 D02 X963 Ireland	01 765 01 00, 1800 437 737	Contact Us Online	Data Protection Commission

Appendix 3 – Location of CCTV

A Closed-circuit television (CCTV) system has been installed in many buildings and on the grounds of DkIT.

The system comprises of 29 number external cameras and 64 number internal cameras.

The cameras cover the main entrances of the:

- Whitaker Building
- Regional Development Centre Building
- North Building
- Pj Carrolls Building (North Entrance and South Entrance)
- Muirhevna Building
- Restaurant Building
- Faulkner Building (East Entrance adjacent to the Student Services office and East entrance adjacent Hospitality Goods Inwards)
- South Building (East Entrance)
- DkIT Sport Building (Main Entrance)

Each of these entrances has two cameras placed in such a position as to view and record persons entering the building and exiting the building at these points.

At the three main campus vehicular entrances:

- Dublin Road
- Hoey's Lane
- Pj Carroll's

and at the

- Main vehicular entrance at the DkIT Sport Building Campus

one camera will view and record vehicles as they enter and leave the campus.

There are a small number of cameras placed at other locations near campus buildings.