



Gateway Credit Union's CCTV Transparency Notice

- 1. Identity and contact details of the data controller** Gateway Credit Union is the data controller for any personal data captured by the CCTV system.
- 2. Contact details for the Data Protection Lead** The Data Protection Officer can be contacted at GDPR@gatewaycreditunion.ie.
- 3. The purposes for which data are processed** Data is processed to monitor and safeguard the safety and security of Gateway Credit Union employees, property, and members, visitors, buildings, information located or stored on the premises, and assets, and those of service providers, consultants, and advisors that assist Gateway Credit Union in carrying out its functions. It is also used to investigate potential security incidents, secure evidence, verify disputed or unclear events, and conduct occasional audits for maintaining security and compliance with Gateway Credit Union policies.
- 4. The legal basis for processing** The legal basis for processing personal data via CCTV is legitimate interests. Gateway Credit Union ensures that the processing is necessary to achieve the identified purposes and does not disproportionately impact individuals.
- 5. Any third parties to whom data may be disclosed** Data may be disclosed to external advisors such as Legal, Insurance, Health and Safety, Security to assist in defending Gateway Credit Union in an incident or accident and may share when legally required, also to An Garda Síochána or other state agencies for purposes such as investigating criminal offences. Additionally, to the CCTV service providers who act as data processors under written contracts with Gateway Credit Union.
- 6. The security arrangements for CCTV footage** Gateway Credit Union has implemented technical and organisational measures to ensure personal data is kept secure from unauthorised or unlawful processing, accidental loss, destruction, or damage. Access to footage is restricted to authorised personnel, and downloads are provided securely.
- 7. The retention period for CCTV footage** CCTV footage is retained for a maximum of one month unless identified as being of potential evidential value in legal or disciplinary proceedings or subject to a request for access.
- 8. The existence of data subject rights and how to complain to the DPC** Individuals captured by the CCTV system has the following rights to request: access to their CCTV footage, rectification to the metadata, erasure, restriction of processing, and objections. Requests can be made in writing to DPL@gatewaycreditunion.ie, providing approximate dates and times of the footage requested. Complaints can be made to the Data Protection Commission (DPC) if individuals believe their rights have been violated <https://www.dataprotection.ie/en/contact/how-contact-us>.