

## **CCTV Surveillance Cameras Policy for Lija Local Council**

### **Scope**

The ***Lija Local Council*** ('the Council') deals with personal data by means of CCTV camera/s and abides by this policy with regards to the data processed by this means.

### **Background Information**

The data controller is the ***Lija Local Council***. The representative of the data controller is the ***Executive Secretary Ms. Pamela Borg***.

The data protection officer representing the ***Lija Local Council*** may be contacted as follows:

### **ADDRESS**

*Lija Local Council*  
*27, Triq Robert Mifsud Bonnici*  
*Lija LJA 1403.*

### **Telephone**

(+356) 21416111

### **Email**

*lja.lc@gov.mt*

Data subjects will have a right of access to data being processed as per Chapter II (Article 15) of the General Data Protection Regulation. (Please refer to section relating to Access, below). Data subjects are also hereby informed of their right to lodge a complaint with the Information and Data Protection Commissioner.

The Information and Data Protection Commissioner may be contacted as follows:

### **ADDRESS**

Information and Data Protection Commissioner  
Level 2, Airways House  
High Street  
Sliema SLM 1549  
Malta

### **Telephone**

(+356) 2328 7100

### **Email**

[ldpc.info@gov.mt](mailto:ldpc.info@gov.mt)

### **Location & Purpose**

CCTV surveillance are installed:

- In the **Lija Local Council** premises (in the reception area),

Affixed notices are placed in prominent and easily visible places within the monitored area.

The purpose of surveillance within the reception area of the Council's premises, is for the security of the Council's premises and property, and the security of its employees and of the general public

accessing the Council's premises, and for surveillance against any criminal conduct. The Council will refer to CCTV footage in the course of an investigation of any such occurrence or of any complaint made with respect to the conduct, action or inaction of any Council employee or any member of the public accessing the council's premises.

Any criminal activity caught on camera will be disclosed to law enforcement authorities after filing a Police report.

Relevant footage will not be used for any other purpose other than the one intended. Processing for a distinct activity that is not compatible with the original reason for which cameras were installed will only be done if prior notice is given to the data subjects, or if the Local Council is under a legal obligation to process such data for any such other purpose.

In view of Article 6 of the GDPR, the Data Controller justifies the use of a CCTV Surveillance Camera system for the above-mentioned purpose on the basis of its legitimate interest to ensure that (i) its premises are adequately monitored and the security of its premises, property, employees, service users and visitors is safeguarded at all times; (ii) it can effectively investigate any allegations of serious misconduct on the part of any employee and effectively enforce its disciplinary procedures in case of a breach; and (iii) to prevent or disclose the commission of any criminal offence. The Data Controller may also be required to process data in compliance with any legal obligation to which it is subject. The recognisable images captured by the cameras will be processed in accordance with good principles of processing of personal data as required in terms of Article 5 of the GDPR

#### **Access to Footage & Data**

Access to the CCTV footage is restricted to authorised personnel only. The Data Controller shall authorise further access to footage if so required when relevant to the purpose/s specified above.

The Council may be required to allow access to the CCTV footage or to provide copies of such footage upon an official request by the Police or other authority which may be authorized by law to request such footage.

The **Lija Local Council** undertakes to comply with a strict security policy vis-a-vis the access to recorded images. Any internal access to visual images by the **Lija Local Council** or any disclosure of such images further to a request by a law enforcement authority or by the data subject shall be logged and kept as evidence.

#### **Right of Access**

Any individual whose personal data is held by the **Lija Local Council**, in the form of CCTV recording, can request access to that recording. The Data Controller is obliged to provide access to the footage without disclosing the identity of third parties.

If an individual is not satisfied with the reply as provided or with the manner of access that has been granted, the matter may be referred to the Information and Data Protection Commissioner who will investigate the case and ascertain that the right of access is properly granted.

Right of access request shall be made in writing and addressed to the Controller.

#### **Retention Period**

Personal data is retained for 30 days. This period is the necessary period for the Council to effectively achieve the purposes for which the data was obtained. After the lapse of this period, images are overwritten by new images. If data is extracted in relation to unacceptable behaviour leading to a

criminal investigation or upon an official request it will be held for the period required to satisfy said legal claims, and securely erased after such activities are exhausted.

**Conclusion**

This policy provides the reasons and means of processing through the use of a CCTV Surveillance System within the ***Lija Local Council*** whilst ensuring that the rights of the data subjects are not infringed, by processing personal data adequately, not more than necessary and making sure that data is not kept for a period longer than necessary in conformity with Data Protection Legislation.

Date: 27/05/2020