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# HRI CCTV Policy



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**Purpose of Policy:** To assist HRI comply with the data protection principles of Article 5 GDPR.

**Contact Person for Questions:**

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## **1. INTRODUCTION**

- 1.1 Closed circuit television systems (“**CCTV Systems**”) are installed in the premises listing at Section 3 – location of Cameras under the control of Horse Racing Ireland and its subsidiaries (“**Horse Racing Ireland**”).
- 1.2 The purpose of this Policy is to regulate the use of CCTV Systems operated by Horse Racing Ireland, to comply with the Horse Racing Ireland’s obligations under data protection law and ensure that all Horse Racing Ireland’s employees are aware of the location and purpose of security cameras.
- 1.3 Recognisable images/footage captured by CCTV Systems are Personal Data and are subject to the provisions of the General Data Protection Regulation (EU 2016/679) and the Data Protection Act 2018. Horse Racing Ireland is the data controller of images/footage of individuals captured by way of CCTV.
- 1.4 Horse Racing Ireland is committed to complying with its obligations under Data Protection law and with the Data Protection Commission’s recommendations in relation to the operation of CCTV Systems.
- 1.5 This Policy applies to all Horse Racing Ireland’s personnel, visitors, contractors, and members of the public and acts as a notice of Horse Racing Ireland’s intended use of CCTV Systems and their locations.

## **2. PURPOSE AND LAWFUL BASIS OF CCTV**

- 2.1 Horse Racing Ireland has a responsibility to protect its property, equipment and resources as well as to provide a sense of security to its employees, contractors, visitors and recreational users of its premises. CCTV Systems are installed at all relevant locations for the purpose of:
  - (i) Enhancing the security of Horse Racing Ireland’s premises, and property;
  - (ii) Promoting and protecting the health and safety of staff, contractors, visitors and recreational users;
  - (iii) Deterring and detecting criminal activity and anti-social behaviour (including theft and vandalism);
  - (iv) Investigating accidents or dangerous occurrences and to assist in the resolution of incidents and the establishment or defence of claims against Horse Racing Ireland;
  - (v) To assist in investigating complaints, allegations, accidents, health, safety, and security incidents in accordance with the Horse Racing Ireland’s disciplinary procedures;
  - (vi) Assisting in identifying, apprehending and prosecuting offenders.

- 2.2 Under Data Protection law, the processing of Personal Data requires a lawful basis. The lawful bases for the Horse Racing Ireland's use of CCTV System are as follows:
- 2.2.1 The processing of Personal Data by way of CCTV Systems is necessary for Horse Racing Ireland to comply with its lawful obligations under the Occupiers' Liability Act, 1995 and under the provisions of health and safety legislation and;
- 2.2.2 The processing of Personal Data by way of CCTV Systems is necessary for the purposes of the Horse Racing Ireland's legitimate interests. Specifically, these legitimate interests include:
- (a) Protecting Horse Racing Ireland's staff, buildings and other assets, both during and after hours;
  - (b) Protecting and promoting the health and safety of staff and visitors;
  - (c) Ensuring fair outcomes in the context of employee disciplinary proceedings; and
  - (d) Ensuring that the interests of Horse Racing Ireland are adequately protected in the event of workplace accidents or other incidents.
- 2.3 CCTV Systems are not used for the purpose of staff monitoring. CCTV Systems will not be deployed in a manner that infringes employees' rights to privacy in the workplace.

### **3. LOCATION OF CAMERAS**

- 3.1 Horse Racing Ireland has endeavoured to select locations for the installation of CCTV Systems which are least intrusive to protect the privacy of individuals. Cameras placed so as to record external areas shall be positioned in such a way as to prevent or minimise recording of passers-by or of another person's private property.
- 3.2 HRI have placed a number of security cameras internally and also externally around the confines of the building at Ballymany Head Office. The internal cameras are in the following locations, and link to a central system based in the comms room which stores images:
- Reception – revolving door
  - Reception – behind reception desk
  - Reception – staff entrance door
  - Racing – at the entrance to the lift area
  - Archive room
  - Comms room

- Tote entrance corridor
- Executive corridor
- Canteen Corridor
- Open plan area at top of main stairs

The external cameras are in the following locations –

### **Ballymany**

- Pole at front of building – One camera looking toward statue, other camera looking towards front entrance
- Front of building Tote side of building looking towards front car park/main entrance
- Front of building on the racing site of building looking along the front toward reception
- Tote side of building looking toward front/road to carpark
- Tote side of building / back wall looking towards foot path
- Tote side of building looking toward tote entrance door
- Back of building looking towards main staff entrance
- Back of building looking out from main staff entrance
- Back of building looking towards generator
- Back of building /finance side looking towards green area
- Back of building/finance side looking towards outside seated area
- Back of building/racing side looking towards outside seated area
- Back of building/racing side looking towards statue
- Front of building outside CEO office looking side balcony/emergency exit door
- Front Gate pole
- Pole located near flag
- Pole located near pond
- Pole located near visitor carpark at side of building
- Pole located near bike shelter

- Pole located at back of carpark

In addition, cameras are located at the following locations on HRI Racecourses

### **Fairyhouse Racecourse - External Cameras**

- Pole located at front gate
- Turnstiles at gate
- Turnstiles behind desk
- Turnstiles at cash office
- Turnstiles main area
- Main office at door
- Weigh room at door
- Powers stand side of building at lift
- Powers stand track side x 2
- Jameson stand track side x 2
- Jameson stand at back overlooking skips x2
- Self-service restaurant at door
- Stable yard and industry areas

### **Leopardstown Racecourse – External Cameras**

- Champions bar at the front door facing the paving area
- Champions bar at back of the bar facing the bar towards the parade ring
- Champions bar at front of bar facing towards the track
- Leopardstown Lounge far left of the bar facing the entrance to the bar
- Leopardstown Lounge far right of the bar facing the entrance to the bar
- 1888 restaurant facing the main entrance to the restaurant
- Corridor on second floor facing the main entrance doors from the parade ring
- The reception in the Pavilion facing main doors
- The Pavilion back corridor facing down the corridor
- The Pavilion main function room facing the bar
- Stable yard and industry areas

### **Leopardstown Golf – Internal & External Cameras**

The internal cameras are in the following locations –

- Over the staff door looking into reception
- In the driving range over the door leading into it
- On the upper level of the driving range overlooking the golf academy

The external cameras are in the following locations –

- Reception - Front door
- At the end of the driving range on the grandstand side
- On the pole beside the 1st tee
- Over the back door looking into the yard
- To the side of the golf centre overlooking the steps to the emergency exit at Golfino & Tier One
- Car park on a pole half way up the car park on the driving range side
- Car park on a pole 3/4 way up the car park on the driving range side
- At the gate of the back yard overlooking the staff car park and main car park

### **Navan Racecourse External Cameras**

- Main Entrance
- Rear Arkle
- Racecourse Entrance
- Parade Ring
- Machinery Shed
- Bookies Ring
- Troytown Bar Rear
- Troytown Bar Front
- Main Stand (Back Office)
- Proudstown Bar
- Turnstiles Front (not working)
- Turnstiles RearCar Park Lower (not working)
- Car Park Upper
- Golf Shed
- Stable Yard & Industry Areas

### **Tipperary Racecourse External Cameras**

- Stable Yard and Industry Areas

## **4. NOTIFICATION AND SIGNAGE**

- 4.1 Easy to read and well-lit signage is in place at each location in which CCTV Systems are sited to indicate that CCTV Systems are in operation. This signage is located at a prominent position at all entrances. Examples of signage are as follows:



#### WARNING: CCTV CAMERAS IN CONSTANT OPERATION

Images are being monitored and recorded for the purpose of security and safety of staff and visitors; crime prevention; disciplinary investigations; protection of buildings and property operated by Horse Racing Ireland. Our CCTV Policy is available at [www.hri.ie](http://www.hri.ie).

Enquiries to Horse Racing Ireland, Ballymany, The Curragh, Co. Kildare, R56 XE37 / 045 455 467 / [dpo@hri.ie](mailto:dpo@hri.ie)

## 5. STORAGE AND RETENTION

- 5.1 Data Protection law provides that Personal Data shall not be kept for longer than is necessary for the purposes for which they were obtained. The images/footage captured by CCTV Systems will be retained for a maximum of 30 days and then automatically overwritten, except in the event of an incident where it may be deemed necessary for Horse Racing Ireland to retain it for a longer period.
- 5.2 If a valid request for a copy of a CCTV Systems recording has been received by Horse Racing Ireland, the recording should not be deleted until the request has been fulfilled.
- 5.3 The images/recordings will be stored in a secure environment. Access will be restricted to authorised personnel, who require access in accordance with the purpose of the CCTV Systems. Similar measures will be employed when using disk storage, with automatic logs of access to the images created.
- 5.4 In certain circumstances, the recordings may also be viewed by other individuals in order to achieve the objectives set out in this Policy. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

## 6. THIRD PARTY ACCESS

- 6.1 In certain circumstances, footage from CCTV Systems may be disclosed to:

- An Garda Síochána where Horse Racing Ireland (or its agents) are required by law to make a report regarding the commission of a suspected crime;
- An Garda Síochána on foot of a request when a crime or suspected crime has taken place and/or when it is suspected that illegal/anti-social behaviour is taking place on Company property;
- To Data Subjects (or their legal representatives), pursuant to an access request under the data protection legislation where the time, date and location of the recordings is furnished to Horse Racing Ireland;
- To Horse Racing Ireland's insurance company (and their legal advisors) where the insurance company requires same in order to pursue or defend a claim for damage done to the insured property;
- To Horse Racing Ireland's legal advisors where required to assist in the provision of legal advice; and/or
- To any other third party where Horse Racing Ireland has a legal obligation to do so.

## 6.2 Third Party Security Companies

- In addition to the third parties outlined at section 6.1, Horse Racing Ireland will permit access to the CCTV Systems to third party providers who provide security services to Horse Racing Ireland.
- Some of Horse Racing Ireland's CCTV Systems are operated by security companies contracted by Horse Racing Ireland.
- Where the CCTV System is operated by a security company contracted by Horse Racing Ireland, Horse Racing Ireland will have a written contract with the security company in place.

## 7. YOUR PERSONAL DATA RIGHTS

### 7.1 Subject Access Requests

7.1.1 On written request, any person whose image has been recorded on a CCTV System has a right to be given a copy of the information recorded which relates to them, subject to certain exceptions. If an image is of such poor quality as not to clearly identify an individual, that image may not be considered to be "personal data" and may not be disclosed by Horse Racing Ireland.

7.1.2 To exercise their right of access, applications should be made in writing to Horse Racing Ireland by contacting the Data protection Officer by email [dpo@hri.ie](mailto:dpo@hri.ie) or in writing to Data Protection Officer, Horse Racing Ireland, Ballymany, The Curragh, Co Kildare. Please provide all the necessary information to assist Horse Racing Ireland in



locating the recorded CCTV images, such as the date, time and location of the recording.

7.1.3 Please submit your request at the earliest possible date. As images recorded by CCTV Systems are retained for 30 days, Horse Racing Ireland will implement a procedure to retain the footage for longer than this period while preparing a response to a valid Subject Access Request. However, if you submit your request at the end of the retention period, it may not be possible to assess the validity of your request and implement the procedure to locate and retain the CCTV footage. In the unlikely event that this arises, Horse Racing Ireland will give reasons when responding to your request.

7.1.4 In giving a person a copy of their Personal Data, Horse Racing Ireland may provide a still/series of still pictures or a disk, USB or other data storage device containing relevant images. However, other people's images will be obscured before the data is released.

## 7.2 **Right to erasure of Personal Data**

7.2.1 You have the right to request that your Personal Data be deleted or removed from our systems and records. However, this right only applies in certain circumstances and there may be circumstances in which we are entitled or obliged not to comply with your request.

## 7.3 **Right to object to processing of Personal Data**

7.3.1 You have the right to object to our use of your Personal Data in certain circumstances. However, we may continue to use your Personal Data, despite your objection, where there are compelling legitimate grounds to do so, or we need to use your Personal Data in connection with any legal claims.

## 7.4 **Right to complain to the relevant data protection authority**

7.4.1 If you think that we have processed your Personal Data in a manner that is not in accordance with data protection law, please contact us at by email [dpo@hri.ie](mailto:dpo@hri.ie) or in writing to Data Protection Officer, Horse Racing Ireland, Ballymany, The Curragh, Co Kildare.

7.4.2 If you are not satisfied with the response you receive from Horse Racing Ireland in relation to your request, then you are entitled to make a complaint to the Data Protection Commission who may investigate the matter for you. The Data Protection Commission's website is [www.dataprotection.ie](http://www.dataprotection.ie) or you can contact their office by email at [info@dataprotection.ie](mailto:info@dataprotection.ie) or by post to Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28.

## 8. **REVIEW**

8.1 The Head of Risk & Compliance will monitor the implementation of the Policy. The Policy will be reviewed and evaluated annually. Ongoing review and evaluation will

take cognisance of changing law or guidelines as well as feedback from staff and others.

If you have any comments or queries on this Policy or Horse Racing Ireland's implementation of CCTV Systems, or if you wish to exercise any of your data protection rights please contact Data protection Officer by email [dpo@hri.ie](mailto:dpo@hri.ie) or in writing to Data Protection Officer, Horse Racing Ireland, Ballymany, The Curragh, Co Kildare.

#### **Version Control**

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