NATIONAL ORTHOPAEDIC HOSPITAL CAPPAGH	**Document Number:**	IM-NOHC-145
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National Orthopaedic Hospital Cappagh, Finglas, Dublin 11.	**DATA PROTECTION NOTICE – CCTV**	

National Orthopaedic Hospital Cappagh (the 'Hospital', 'NOHC', we, us, our), is committed to the privacy of patients, staff and visitors to the Hospital.

NOHC complies with the General Data Protection Regulation (GDPR) and the Data Protection Acts 1988 - 2018 (DPA) and is a Data Controller for the purposes of processing personal data collected and captured on our Closed-Circuit Television Systems ('CCTV').

Purpose of processing
The purpose of CCTV usage in the Hospital Campus is for the Security, Health & Safety of patients, staff and visitors. This includes ensuring the security and safety of patients, staff and visitors, their property and the Hospital's property and to protect against and deter crime such as theft and vandalism.

Scope
CCTV is used to monitor access to the Hospital grounds, building entrances, and internal areas of public access. CCTV will act a deterrent to unlawful or dangerous activity. Areas covered by CCTV will be those most susceptible to unauthorised activities.

Care is taken to ensure the personal privacy of staff, patients and visitors is not breached by the CCTV cameras. Cameras will not be used where individuals have a reasonable expectation of privacy.

Legal Bases
NOHC relies on GDPR Article 6(1)(c) in that the processing is necessary for compliance with a legal obligation. The legal obligation is the need to comply with the Safety, Health & Welfare at Work Act 2005, Occupiers' Liability Act, 1995, legislation and common law.

NOHC relies on GDPR Article 6(1)(f) in that it has a legitimate interest in deterring and preventing crime and in accordance with Section 41 of the DPA.

Transparency
Appropriate signage has been placed around the Hospital Campus to notify individuals that
(a) recording is taking place,
(b) the purpose of the recording,
(c) the identity of the 'data controller' and
(d) contact information for the Data Protection Officer.

This Data Protection Notice is published on the Hospital web-site www.nohc.ie.

Security
The Hospital's CCTV system and digital recorders are secured in restricted areas only accessible by authorised users. The CCTV administration function is password protected and can only be accessed by an authorised user. Access to and viewing of CCTV monitors is restricted to authorised users including third-party authorised users such as contracted security staff.

Disclosure
CCTV footage will be disclosed to authorised Hospital recipients and authorised third party recipients on a "need to know basis" and in compliance with law.

An example of an appropriate third party is An Garda Síochána for the purposes of investigating a crime or offence against a staff member or visitor of the Hospital. Requests from An Garda Síochána must be in writing and will be processed in accordance with Data Protection Laws and in particular Section 41 of the DPA which provides for access in the following circumstances: -

- The prevention, detection or investigation of crime
- If required urgently to prevent threats to public security and public safety

Access to CCTV footage may also be required by or under any enactment or by a rule of law or order of the Court and such requests will be facilitated as appropriate.

See the section **Your Rights under GDPR** below for Subject Access Requests.
On receipt of an approved request for a specific piece of footage, this footage once identified will be extracted and recorded onto a separate electronic device and processed as necessary for the purposes of responding to the request.

Prior to disclosure to authorised third party recipients any non-relevant personal data will be blurred by pixilation or other technical measures to obscure that data.

Retention
We only retain CCTV footage for a period of 1 calendar month. Personal data extracted for disclosure will be retained for additional periods of time until the purpose for which they were extracted is satisfied.

Your Rights under GDPR
The following details your rights, how you can exercise these rights and how we intend to satisfy your requests.

Your Right of access
You have the right to find out if the Hospital is using or storing your Personal Data. This is called the right of access. You exercise this right by asking for a copy of the data, which is commonly known as making a 'subject access request'. There are some exemptions, which means you may not always receive all the information we process.

How do I make a request for my data?
You can make a subject access request verbally or in writing. When making a subject access request, please provide the following information:

- Your name and contact details.
- Any information used by the Hospital to identify or distinguish you from other people with the same name (account numbers etc).
- Any details or relevant dates that will help it identify what you want.
- Details of the data you want, be as specific as possible.

When requesting CCTV personal data please provide a specific date and time and location, otherwise your personal data may not be locatable.

We also need to verify your identity so please be prepared to submit a copy of identification documents (passport/driving licence and confirmation of address). When we have your request and have verified your identity, we have up to one calendar month to fulfil your request. However, if the request is complex, we have the option to extend this period by up to a further 2 months.
In the course of dealing with your request, we consider the rights of others and obligations of confidentiality which may apply, in addition to exemptions under GDPR and the Data Protection Act. Where the identity of others would be disclosed in data relating to you, we may redact that data to protect the privacy and confidentiality of such persons. We may redact other information which is confidential to the Hospital and is not your Personal Data. If your request is in electronic form the data will be provided in a commonly used electronic form.
Once our response to your subject access request is finalised and provided to you, we will retain a full copy for 2 years.

Your right to rectification
You have the right to ask us to rectify information you think is inaccurate.

Your right to erasure
You have the right to have your information deleted or we may delete your data under the following conditions:

- the Personal Data are no longer necessary in relation to the purposes for which they were collected, or otherwise processed
- you withdraw your consent where there is no other legal ground for the processing;
- the Personal Data have been unlawfully processed;
- the Personal Data have to be erased for compliance with a legal obligation.

This may not apply when the Hospital is complying with a legal obligation, or performing a task in the public interest or for archiving or research purposes, or for exercise of the defence of a legal claim.

Your right to restriction of processing
You have the right to ask us to restrict the processing of your information in certain circumstances.

Your right to object to processing
You have the right to object to processing in certain circumstances.

Your right to data portability
This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another, or give it to you. Not applicable to CCTV processed personal data.

Further information on your rights
Further information on your rights is available at the Data Protection Commission website: www.dataprotection.ie

How to exercise your rights
You can exercise your rights and/or if you wish to make a request, by contacting us by email at dpo@nohc.ie or by telephoning on +353 814 0400. Whenever you contact us to ask about your Personal Data, we may ask you to verify your identity. This is to help protect your privacy. We generally do not charge you when you wish to exercise your rights. If requests are deemed excessive or manifestly unfounded, we may charge a reasonable fee to cover the additional administrative costs or choose to refuse the request.

What can you do if you have a complaint about the use of your Personal Data?
Our Data Protection Officer oversees how we collect, use, share and protect your Personal Data to ensure your rights are fulfilled. If you have a complaint about the use of your Personal Data, please contact our Data Protection Officer at dpo@nohc.ie or by telephoning on +353 814 0400 giving us the opportunity to put things right as quickly as possible.
You may also contact the Office of the Data Protection Commission:

- Visit their website www.dataprotection.ie.
- Email info@dataprotection.ie
- Phone on +353 (0)57 8684800 or +353 (0)761 104 800
- Write to the Data Protection Commission, 21 Fitzwilliam Square South Dublin 2, D02 RD28

How will the Hospital make updates to this notice?
We may make changes to this notice from time to time, particularly if we change how we use Personal Data, or change our technology and products. You can always obtain an up-to-date version of this notice on our web-site.

Glossary of Terms and Definitions

Authorised User	NOHC employee, agent or servant including security contractors who is authorised by the Hospital to process CCTV personal data
CCTV	Closed Circuit Television – the use of video cameras to transmit a signal to a specific, limited set of monitors. It differs from broadcast television in that the signal is not openly transmitted.
CCTV equipment	Cameras, monitors for displaying images, recording facilities, footage, etc.
Data Protection Laws	Data Protection Acts 1988 - 2018 & the General Data Protection Regulation ('GDPR')
Data Subject	Person to whom the personal data relates
ICT	Information & Communications Technology
Personal Data	'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; Article 4(1) GDPR
Pixelate	Remove/blur images to ensure third parties are not recognisable from the footage
Hospital Campus	Hospital buildings and grounds
Visitor	A visitor, is someone who is on the Hospital Campus at the invitation of or with the permission of NOHC.