

Belfast Self Storage

CCTV Privacy Notice

Welcome to the Belfast Self Storage CCTV Privacy Notice. To protect our customers, Belfast Self Storage operates a 24/7 closed circuit television ("**CCTV**") system (the "**Security System**"). The purpose of this Privacy Notice is to inform you as to how we look after your personal data collected through the Security System when you visit any of the Belfast Self Storage locations.

This Privacy Notice is provided in a layered format so you can click through to the specific areas set out below.

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1 Important information and who we are

1.1 Purpose of this Privacy Notice

This CCTV Privacy Notice is intended to ensure that you are aware of what personal data HSIL Properties (Self Storage) Ireland Limited trading as Belfast Self Storage under company number 443154 (**the Company, we, us, our**) with a registered address at Unit 1 North Retail Park, North Road, Finglas, Dublin 11, Ireland, D11 E6C3 holds and processes in relation to you.

1.2 Controller

This CCTV Privacy Notice is issued on behalf of the Irish entity of the Belfast Self Storage group and when we mention "Belfast Self Storage", "we", "us" or "our" in this CCTV Privacy Notice, we are referring to the Irish entity of Belfast Self Storage responsible for processing your data. Belfast Self Storage is the controller and responsible for our Security System.

We have appointed a Data Compliance Manager who is responsible for overseeing questions in relation to this CCTV Privacy Notice. If you have any questions about this CCTV Privacy Notice or information we hold about you, including any requests to exercise your legal rights, please contact us our Data Compliance Officer at email@belfastselfstorage.co.uk or write to us at Unit 1 North Retail Park, North Road, Finglas, Dublin 11, Ireland, D11 E6C3.

1.3 Changes to this Privacy Notice

We keep our CCTV Privacy Notice under regular review and we will place any updates on this web page. We advise you to review this page regularly to stay informed and to make sure that you are happy with any changes. This CCTV Notice was last updated on 14/04/23 and is published in accordance with the requirements of the General Data Protection Regulation (EU) 2016/679 ("GDPR").

2 The data we collect about you

We collect, use, store and transfer CCTV data through the Security System when you enter any area of the premises covered by the Security System, such as the storage facilities and reception of our offices

The Security System captures still video images and video recordings only from an average of 11 internal and 5 external CCTV cameras on the premises. CCTV cameras are located at Belfast Self Storage and are operational 24 hours a day, seven days a week.

CCTV cameras are not located in any [public toilets, staff toilets, locker rooms, canteens or management offices]. We do not operate covert or body worn cameras. [No audio is ever recorded].

The Security System does not include any specific technical features, such as the use of facial recognition software, which involve the processing of biometric data, or the processing of any other personal data considered to fall within the Special Categories of Personal Data under Article 9 GDPR.

3 How we use your CCTV data

We will only use your CCTV Data when the law allows us to. We have set out a description of all the ways we plan to process your CCTV data and which of the legal bases we rely on to do so in a table format below. We have also identified what our legitimate interests are where appropriate.

Performance of a contract: where you are a party to our Terms and Conditions, we process your CCTV data where it is necessary in order to perform our obligations under our Terms and Conditions.

Consent: In principle, we do not rely on your consent for data use. We may, however, from time to time ask for your consent to use your CCTV data for a specific purpose. Where we rely on your consent to process your CCTV data, you have the right to withdraw consent at any time by contacting us at email@belfastselfstorage.co.uk

Legitimate interests: we process your CCTV data where this is necessary for our legitimate interests as specified in the table below. Where we process CCTV data on the basis of our legitimate interests, we do so in a fair, transparent and accountable manner and take appropriate steps to prevent such activity having any unwarranted impact on you. We do not process your CCTV data where such legitimate interests are overridden by your interests, fundamental rights or freedoms. You have a right to object to processing of your CCTV data where we are relying on a legitimate interest (see further section 8). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Compliance with a legal obligation to which we are subject: we process your CCTV data to discharge a relevant EU or EU Member State legal or regulatory obligation to which we are subject, including in order to comply with obligations arising under specific legislation. We have included examples of the relevant laws in the table below.

Purpose/Activity	Processing Operations ¹	Lawful basis
<p>Service Provision: Providing of our Service to you including:</p> <p>(a) enabling us to provide safe and secure access to our premises and storage facilities; and</p> <p>(b) protecting your personal property which is stored in our storage facilities.</p>	<p>Collection</p> <p>recording</p> <p>storing</p> <p>retrieving</p> <p>consulting</p> <p>using</p> <p>disclosing</p>	<p>This processing is necessary for the performance of our Terms and Conditions with you.</p>
<p>Business Management: Administering and protecting our business, property and Services by:</p> <p>(a) identifying victims and witnesses of potential anti-social or criminal behaviour on the grounds the Belfast Self Storage Locations;</p> <p>(b) identifying the victims and witnesses of potential accidents and incidents for the purpose of defending Belfast Self Storage Locations against public liability and personal injury claims;</p> <p>(c) identifying individuals who attempt to or gain access our storage units; and</p> <p>(d) deterring criminals who are looking for opportunities</p>	<p>Collection</p> <p>recording</p> <p>storing</p> <p>retrieving</p> <p>consulting</p> <p>using</p> <p>disclosing</p>	<p>This processing is necessary for our legitimate interests² to (i) enforce and/or defend our rights under our Terms and Conditions and (ii) prevent and address fraud, unauthorised use of Belfast Self Storage services, violations of our Terms and policies, or other harmful or illegal activity.</p>

¹ Company to review and confirm the extent to which the above processing is applicable to it. The DPC's [WhatsApp decision](#) requires privacy notices to provide data subjects with granular information including:

- (i) linking each category of personal data (in this case, CCTV data) with a processing purpose, processing operation and legal basis;
- (ii) the specific details of the EU or Member State law where a controller intends to ground a processing operation on compliance with a legal obligation.

² Legitimate interest assessment to be carried out for all processing that identifies legitimate interests as its legal basis.

to break into office premises.		
EU and EU Member State Laws: To comply with obligations arising under EU or EU member state law ³ .	Collection recording storing retrieving consulting using disclosing	Necessary to comply with our obligations arising under EU and EU Member State laws including (i) binding requests from regulatory bodies and law enforcement such as in relation to an information notice from the Data Protection Commission under the Data Protection Act 2018 or an investigation under the Criminal Justice (Miscellaneous Provisions) Act 1997 (as amended). Please contact us at email@belfastselfstorage.co.uk if you want further information on the specific legal obligations which it is necessary for us to process your CCTV data in connection with.

³The DPC's WhatsApp decision held that where compliance with a legal obligation is identified as a legal basis the relevant statutory provision must be identified. As discussed the WhatsApp decision is under appeal and we have not seen business adopt this recommendation wholesale. The approach in this Notice is a middle ground where examples of the statutory provisions are included.

4 Disclosures of your CCTV data⁴

Access by Belfast Self Storage Personnel. We allow only authorised employees to access CCTV data collected by the Security System, and only where there is a lawful purpose for accessing the information. All such authorised employees are trained in how to appropriately handle personal data.

Access by other third parties. Our contracts with third party providers only allow use of your information to provide their services and require that they not disclose it unless required in certain situations. We review the security policies and practices of our third party service providers as appropriate as part of our own efforts to maintain the security of your information. We may store your information with or allow access to your information to the following third parties who provide us with certain services:

- [Belfast Self Storage insurers, who will receive copies of data relating to serious incidents which have occurred on the premises. All non-relevant images and individuals are redacted in the data provided to the insurers.]
- Chubb, Belfast Self Storage third-party data processor which redacts CCTV footage on behalf of Belfast Self Storage where required, or any future replacement of equipment which provides such services to Belfast Self Storage

Law Enforcement, Court Orders and Protection of Our Rights. We may disclose data collected through the Security System to government officials as necessary to comply with applicable laws and orders, or where we consider it necessary in our or a third party's legitimate interests. If we receive a request to disclose any such information, we may do so if we believe in our reasonable discretion that such request is lawful and that disclosure is reasonably necessary to comply. We may also disclose your CCTV data to respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims. In the event that we are legally compelled to disclose your personally identifiable information to a third party, we will attempt to notify you unless doing so would violate the law, court order or government instruction.

5 International transfers

Belfast Self Storage does not transfer any personal data collected through the Security System outside of the European Economic Area.

6 Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those authorised employees and third party processors who have a business need-to-know. Our authorised employees and third party processors will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We use industry-standard measures to safeguard all data and have a continuous process in place to test the effectiveness of these measures and to review the threat landscape and new tools available. All CCTV Data, are stored in DVR, which can only be accessed by [authorised employees by keypad, or by third parties through a sign-in system controlled by Belfast Self Storage].

⁴The DPC's WhatsApp decision provides that individuals should be made aware of which categories of personal data will be sent to which category of recipient (para. 428).

7 Data retention

We and our third party processors will keep personal data in our active operating systems only for as long as necessary to fulfil the purposes we collected it for. We retain CCTV Data for 30 days, after which it is automatically deleted from the system requested by an authorised employee or member of An Garda Síochána in pursuance of a criminal or civil investigation.

8 Your legal rights

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. This right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you. Please note that Belfast Self Storage does not rely on consent or performance of a contract with you as its legal bases for processing personal data in the context of the Security System.

Withdraw consent at any time where we are relying on consent to process your personal data. Please note, however, that Belfast Self Storage does not rely on consent as its legal basis for processing personal data in the context of the Security System.

Contact Us If you would like to exercise any of the above rights, please contact us at email@belfastselfstorage.co.uk with your request. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

You have the right to make a complaint to a data protection supervisory authority at any time. The Data Protection Commission ("**DPC**") is the Irish supervisory authority and can be contacted at info@dataprotection.ie. We would, however, appreciate the chance to deal with your concerns before you approach the DPC or another data protection supervisory authority so please contact email@belfastselfstorage.co.uk or at the Belfast Self Storage postal address