

U Store It CCTV Monitoring Policy

General

Closed circuit television ("**CCTV**") systems are installed at all U Store It storage facilities and premises. The cameras are in the publicly accessible areas of the premises and non-publically accessible storage facilities and record customers, staff members, and the public.

The prime reason for the use of CCTV is crime prevention and to assist in incident reporting. This policy details the scope, operation and use of CCTV.

Overall Responsibility

HSIL Properties (Self Storage) Ireland Limited trading as U Store It ("**U Store It**") has overall responsibility for the operation of the CCTV system ("**CCTV Controller**").

Our Duties

We have a responsibility to our clients and to provide 24-hour security and access to our storage facilities. We also owe a duty to our clients and employees to make their business and working environment a safe one.

We also have a legal responsibility under the General Data Protection Regulation ("**GDPR**") to ensure our use of CCTV is necessary to achieve our purpose, fair, and not unduly intrusive. Under the GDPR recognisable images captured on CCTV are regarded as personal data and therefore come within its ambit. We must always be able to justify the requirement for CCTV in the monitored locations.

Purpose and GDPR Legal Basis for CCTV Monitoring

We use CCTV for the following:

Purpose	Lawful Basis
Service Provision: Providing of our Services including: (a) enabling us to provide safe and secure access to our premises and storage facilities; and (b) protecting personal property which is stored in our storage facilities.	This processing is necessary for the performance of our contractual obligations .
Business Management: Administering and protecting our business, property and Services by: (a) identifying victims and witnesses of potential anti-social or criminal behaviour on the grounds the U Store It Locations; (b) identifying the victims and witnesses of potential accidents and incidents for the purpose of defending U Store It Locations against public liability and personal injury claims; (c) identifying individuals who attempt to or gain access our storage units; and (d) deterring criminals who are looking for opportunities to break into office premises.	This processing is necessary for our legitimate interests to (i) enforce and/or defend our rights under our Terms and Conditions and (ii) prevent and address fraud, unauthorised use of U Store It services, violations of our Terms and policies, or other harmful or illegal activity.
EU and EU Member State Laws: To comply with obligations arising under EU or EU member state law.	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).
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A legitimate interest assessment should be carried out for all CCTV processing which identifies legitimate interests as its legal basis.

Locations

The reception area has an average of 2 cameras. Visitors must be informed on entering the office by prominent signage.

The storage facilities have an average of 10 cameras. Customers must be informed on entering the office by prominent signage.

We do not operate covert or body worn cameras.

If additional cameras are to be installed for special events, their location and access to any footage recorded will be subject to the approval of the CCTV Controller.

Retention

Under the GDPR we must not retain CCTV footage for longer than the purpose for which it was intended. In general, CCTV footage should be kept for no longer than 30 days, unless there is a specific incident which requires it to be kept for a longer period. Specific incidents include a crime or accident in an office. Once that incident has been dealt with then the footage should be destroyed.

All stored footage on tapes, DVD or other media must be retained in a secure location on the U Store premises. The CCTV Controller will maintain a record of the individuals who gain entry to the secure location.

Access to Recorded Footage

The CCTV Controller has overall responsibility for access to recorded footage and no footage can be released to any third party without their approval. They may permit others to have regular access, such as Branch Managers, but this must be on an as required basis.

All Data Subject Access Requests under the GDPR must be copied to the CCTV Controller. The CCTV Controller will determine if any relevant footage can be released to the data subject and whether any measures such as pixelating or otherwise de-identifying the images of other identifiable parties who appear in the footage are required.

Where images of parties other than the requesting data subject appear on the CCTV footage the data controller must consider on an individual basis whether the release of the unedited footage adversely affects the rights or freedoms of the third parties, such as their data protection rights or intellectual property rights such as copyright.

The controller can ask the individual requesting access to give a reasonable indication of the date and time of the footage they are looking for. If the recording has already been deleted in line with the retention policy by the date the request is received, the individual should be informed that the footage no longer exists. If an access request has been received, the footage should not be deleted until the request has been fulfilled. The Controller will take advice from U Store It lawyers where necessary.

Access to Real Time Footage

It is necessary for the following persons to have access to be granted access by the Controller to the CCTV monitoring in real time for the purposes of overseeing the provision of safe storage:

Branch Manager

Prior to access being granted, they must be informed of U Store It's obligations under the GDPR and the provisions of this policy.

Failure to comply with the GDPR or this policy will be reported to management.

Outsourcing

Where the processing of the CCTV cameras is outsourced to another company we will put in place a legally binding data processing arrangement with the processor in respect of the processing and will inform data subjects of the details of the third party to whom their data is being disclosed.

On-going Review

The CCTV Controller will be responsible for the ongoing review on the CCTV Monitoring Policy. This will include the review of any new guidelines or policies issued by the Data Protection Commission in relation to the GDPR and CCTV related data protection compliance.

If a data subject wishes to access information in relation to any of the section in this policy they can contact our Compliance officer at email@ustoreit.ie