

**PEBBLE BEACH OWNERS MANAGEMENT  
COMPANY LTD by guarantee**

**CLOSED CIRCUIT TELEVISION (CCTV)**

**POLICY & GUIDELINES**

**Adopted by Management Team at its meeting on**

**09th March 2020**

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## INTRODUCTION

### 1.0 Policy Statement

- 1.1 CCTV and surveillance systems have a legitimate role to play in helping to maintain a safe and secure environment for our staff, home owners and visitors. Pebble Beach Owners Management Company also has statutory law enforcement rights and obligations. These roles must be balanced, proportionate and undertaken in compliance with data protection law. This policy is intended to assist staff in complying with legal obligations when working with personal data.
- 1.2 Any questions in relation to this policy should be directed to pebblebeachomc@yahoo.com
- 1.3 Pebble Beach Owners Management Company has the following types of surveillance systems in place:
- CCTV;
- 1.4 This system is in place at Pebble Beach estate, Tramore, Co. Waterford for the following purposes:
- protecting the safety and security of its staff, Owners, buildings, assets and information located or stored on the premises;
  - Securing public order and safety in common area's
  - to assist with Waterford Council's own law enforcement purposes e.g. illegal dumping/litter pollution
- 1.5 Images are monitored and recorded at the security hut building at the entrance into Pebble Beach and will be used in strict accordance with this policy. This system is owned by Pebble Beach Owners Management Company Ltd by guarantee, details of which are contained in **Appendix 1 and Appendix 2**.
- 1.6 The CCTV system operated by Pebble Beach Owners Management Company is regulated in accordance with the Data Protection Acts 1988-2018 (as amended) and the General Data Protection Regulation (**GDPR**) (the '**Acts**').
- 1.7 For the purpose of the Acts (including Part 5 of the Data Protection Act 2018, where relevant) the Data Controller is Pebble Beach Owners Management Companies Administrator Ms Melissa Murrayhill.
- 1.8 Where images captured by surveillance technology are capable of identifying a natural person, they constitute personal data and are covered by the Acts. This Policy is associated with the Pebble Beach Estate Privacy Notice and Data Protection Policy, the provisions of which should be adhered to at all times.

1.9 Our data protection contact for the purpose of the Acts is:

Data Protection Controller:  
Melissa Murrayhill  
Email: pebblebeachomc@yahoo.com

## **2.0 Policy Purpose**

2.1 The purpose of this policy is to outline the procedures and safeguards in place in regard to the operation of and access to the CCTV system.

## **3.0 Policy Scope**

3.1 This policy applies to all Pebble Beach Owners Management Companies staff, including consultants, temporary workers and to all CCTV and surveillance systems operated by Pebble Beach Owners Management Company:

- a) General data protection rules, as set out in the Acts (excluding Part 5 of the Data Protection Act 2018) and
- b) For law enforcement purposes, under Part 5 of the Data Protection Act 2018

## **Part A: USE OF CCTV AND OTHER SURVEILLANCE TECHNOLOGIES UNDER GENERAL DATA PROTECTION RULES**

### **4.0 Legislation**

4.1 The Acts (excluding Part 5 of the Data Protection Act 2018).

4.2 The following Data Protection Principles apply to the use of CCTV. Personal data must be:

- Processed lawfully, fairly and in a transparent way ('transparency');
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (except for archiving in the public interest) ('purpose limitation');
- Adequate, relevant and limited to what is necessary for the purposes its being processed ('data minimisation');
- Accurate and kept up to date ('accuracy');
- Kept safe and secure using appropriate technical and organisational measures ('integrity and confidentiality');
- Retained for no longer than is necessary for the specified purpose ('storage limitation').

Pebble Beach Owners Management Company must be able to demonstrate compliance with each of these principles ('accountability').

## **5.0 Purpose of the CCTV**

### **5.1 CCTV based in Pebble Beach**

This CCTV system has been installed by Pebble Beach Owners Management Company. The purpose is to secure safety and to deter illegal dumping or anti-social behaviour in common area's. This purpose will be achieved by monitoring the system to:

- Deter those having criminal intent;
- Assist in the prevention and detection of crime and to investigate security incidents to secure evidence, should such incidents occur;
- Facilitate the identification, apprehension and prosecution of offenders in relation to crime.

### **5.2 CCTV system on Pebble Beach Estate – Tramore, Co. Waterford**

This system has been installed by Pebble Beach Owners Management Company with the purpose of protecting the security of The Pebble Beach estate and helping to ensure the safety and security of all owners, employee's, visitors consistent with respect for the individuals' privacy. These purposes will be achieved by monitoring the system to:

- Deter those having criminal intent;
- Assist in the prevention and detection of crime and to investigate security incidents to secure evidence, should such incidents occur;
- Facilitate the identification, apprehension and prosecution of offenders in relation to crime;
- In certain circumstances, where Pebble Beach Owners Management Company becomes aware of or suspects inappropriate or unlawful activity on the part of its owners, employees of a reasonably serious nature, CCTV may be used as part of the formal internal investigation and disciplinary procedure, where necessary and proportionate.

## 6.0 Roles & Responsibilities

- 6.1 The CCTV system in use in Pebble Beach, is maintained by CCS Facilities, as outlined in **Appendix 1 and Appendix 2**.
- 6.2 The CCTV system is accessed as necessary by designated Data Protection Officer Ms Melissa Murrayhill. Images captured by the system is monitored and recorded in a individual control room/box/comms. Monitors are not visible from outside the control room. Access to control rooms/box is strictly limited to the Controller.
- 6.3 No unauthorised access to the individual control room/boxes will be permitted at any time. Access will be strictly limited to the controller listed in **Appendix 3**, authorised members of senior management, an Garda Siochana and any other person with statutory powers of entry.
- 6.4 Before allowing access to the individual control room/box, staff will satisfy themselves of the identity of any visitor and that the visitor has appropriate authorisation. All visitors will be required to complete and sign the visitors' log, which shall include details of their name, their department or organisation they represent, the person who granted authorisation and the times of entry to and exit from the centre. A similar log will be kept of any visitors granted emergency access.
- 6.5 In order to protect the security of the CCTV system, a number of technical and organisational measures have been put in place, including:
- Access rights to users are granted only to those where it is strictly necessary for them to carry out their work;
  - Only the controller (after consulting with The directors of the management company) can grant, alter, or annul any access rights of any persons.
  - The hard drive is a 30 day time lapse recorder and rerecords over itself after 30 days.
  - The CCTV system is password protected.
- 6.6 All CCTV equipment is tested and monitored in a planned and co-ordinated manner by CCS Facilities who are responsible for reporting any defects to the Estates Management company.
- 6.7 Following consultation with the Data Protection Officer, the Directors of Pebble Beach Omc has overall responsibility for overseeing the management of CCTV within their respective directorate, and ensuring the designated staff are adequately trained and informed of the appropriate use of CCTV.
- 6.8 The Data Protection Officer is responsible for monitoring compliance with this policy.

## **7.0 Summary Description & Technical Specifications for the CCTV system**

7.1 The CCTV systems are conventional static systems. This also includes a vehicle recognition camera. They record digital images and are equipped with motion detection. They record any movement detected by the cameras in the area under surveillance, together with time, date and location.

7.2 All cameras operate 24 hours a day, seven days a week.

7.3 The image quality in most cases allows identification of those individuals in the camera's area of coverage.

Cameras are located at strategic points around The Pebble Beach estate, principally at the entrance and exit points. Cameras are also located at strategic points throughout the estate to deter illegal dumping/fly tipping.

7.4 Most cameras are fixed or may facilitate a swivel action.

## **8.0 Siting of Cameras**

8.1 It is essential that CCTV equipment is sited in such a way that it monitors those areas intended to be covered by the equipment.

## **9.0 Quality of the Images from CCTV**

9.1 It is important that the images produced by the equipment are as clear as possible in order to ensure that they are effective for the purposes for which they are intended.

9.2 The equipment and recording media should be maintained on a regular basis and upgraded if necessary to ensure the quality of the images is upheld.

9.3 Although every effort has been made to ensure maximum effectiveness of the CCTV system, it is not possible to guarantee that the system will detect every incident taking place within the area of coverage



## **10.0 Retaining Information**

- 10.1 Digital recordings are made using digital video recorders operating in time lapse mode. Incidents may be recorded in real time.
- 10.2 It is important that the images are not retained for longer than is considered necessary for the purposes for which they are processed. Therefore, unless the images are required to investigate an incident, they will not be retained beyond a maximum of thirty days. After 30 days the footage will be automatically over-written.

## **PART B: USE OF CCTV FOR LAW ENFORCEMENT PURPOSES**

### **11.0 Processing data for law enforcement purposes**

- 11.1 Where Pebble Beach Owners Management Company is acting as a 'Competent Authority' and is operating CCTV and surveillance systems for law enforcement purposes, Part 5 of the Data Protection Act 2018 will apply to this data processing activity. Different rules apply to the processing of data for law enforcement purposes.

### **12.0 Types and purposes of the surveillance technology in use**

#### **12.1 CCTV**

The CCTV systems at bin bays has been installed by Pebble Beach Owners Management Company for the purpose of detecting and preventing **waste and litter offences** under the Litter Pollution and Waste Management Acts. These purposes will be achieved by monitoring the system to:

- Detect waste and littering offences
- Assist in the prevention and detection of littering and illegal dumping and secure successful prosecutions

### **13.0 Logging of automated processing**

- 13.1 A 'Data Log' shall be maintained in respect of all processing by automated means including CCTV and other automated surveillance, in accordance with the requirements of Section 82 of the Data Protection Act 2018.
- 13.2 The Data Log shall contain the following information:
- a) The collection of personal data in this way by Pebble Beach Owners Management Company i.e. a list of CCTV systems in use and the alteration of any such data;
  - b) The consultation of the data by any person (including the identity of the person who consulted; the date, time and reason for the consultation; identity of the recipient);
  - c) The disclosure of the data including the transfer of the data to any other person (including the identity of the person who disclosed; the date, time and reason for the disclosure; identity of the recipient);
  - d) The combination of the personal data with other data;
  - e) The erasure of all or some of the personal data.
- 13.3 The Data Log shall not be used for any purpose other than to:
- a) Verify the lawfulness of the processing;
  - b) Monitor the processing being carried out by Pebble Beach Owners Management Company;
  - c) Ensure the integrity and security of the personal data concerned or
  - d) For the purpose of criminal proceedings.

### **14.0 Retaining data**

- 14.1 The data collected shall not be retained for longer than is necessary for the specific law enforcement purpose.
- 14.2 A quarterly review of all data held for law enforcement purposes must be carried out by the Head of Section (in conjunction with the DPO) to determine whether data can be deleted.
- 14.3 Head of Section is responsible for coordinating and responding to any requests from the data subject and all communication with the data subject should be through the Data Protection Officer.

## **15.0 Roles and responsibilities**

- 15.1 Following consultation with the Data Protection Officer, each Director and Head of Section has overall responsibility for overseeing the contractual CCTV/surveillance services provided in each section and ensuring the designated staff are adequately trained and informed of the appropriate use of CCTV.
- 15.2 The DPO is responsible for monitoring compliance with this policy and should be consulted on all issues concerning data protection and the use of CCTV or other surveillance technologies.

## **PART C: MISCELLANEOUS**

### **16.0 Notifications, information & signage**

- 16.1 Data subjects must be notified of, and provided with certain information in relation to, the processing activity being carried out by Pebble Beach Omc, irrespective of the purpose of the surveillance. This information is included in the signage appended to this document.
- 16.2 It is also essential that signage is displayed in a prominent place where they will be clearly seen by staff, owners and visitors, and the public. Templates for signage are available in **Appendix 4**.

### **17.0 Security of CCTV systems and risk assessment**

- 17.1 Following consultation with the Data Protection Officer, before any CCTV systems or other forms of surveillance technologies are implemented, Pebble Beach Omc must:
1. Carry out a risk assessment in respect of the processing which evaluates the risks to the rights and freedoms of individuals arising from the processing;
  2. Carry out a Data Protection Impact Assessment in respect of the processing (as required by Article 35 of the GDPR and Section 84 of the Data Protection Act 2018) and
  3. Implement the security measures set out in Section 77 of the Data Protection Act 2018 and listed in **Appendix 5**.
- 17.2 Any other technical and organisational measures necessary to protect the data from unauthorised or unlawful processing and accidental loss, destruction or damage must also be implemented. This includes robust IT security solutions and strict physical and electronic access controls.

- 17.3 Access to the systems is strictly limited to the Data Protection officer and/or security companies acting on its behalf which are set out at **Appendix 3**.
- 17.4 The granting of access permissions shall be determined and approved by a Director of Pebble Beach Omc.

## **18.0 Access to the images**

- 18.1 It is important that access to, and disclosure of images and recordings are strictly controlled and documented. This is to ensure that the rights of the individual are maintained, and that the chain of evidence remains intact should the images be required for evidential purposes.
- 18.2 All access to images and recordings will be recorded in the **Access Log** and **Data Log** (as set out under Section 14 above in respect of automated processing for law enforcement purposes).
- 18.3 Access to CCTV images and systems will be restricted to those staff who need to have access in accordance with the purposes of the system. Access to the systems is strictly limited to the data protection officer and/or security companies acting on its behalf which are set out in appendices attached. The procedures for accessing the data, as set out at Section 6.0 above, shall be followed at all times.
- 18.4 The granting of access permissions shall be determined and approved by Director of Pebble Beach Omc.
- 18.5 Access to images by third parties:

Disclosure of recorded material will only be made to third parties in strict accordance with the purposes of the system and is limited to the following authorities:

- Law enforcement agencies where images recorded would assist in a criminal enquiry and/or the prevention of terrorism and disorder
- Prosecution agencies
- Relevant legal representatives
- The media where the assistance of the general public is required in the identification of a victim of crime or the identification of a perpetrator of a crime
- People whose images have been recorded and retained unless disclosure to the individual would prejudice criminal enquiries or criminal proceedings.
- Emergency services in connection with the investigation of an accident.

Access to these images will normally be through the following: Request from law enforcement agencies by Court Order, Freedom of Information access request or a Data Subject Access Request.

- 18.6 Only in exceptional circumstances may images be disclosed to those carrying out formal **internal investigation or disciplinary procedure**, where it can reasonably be expected that the disclosure of the images may help the investigation or prosecution of a sufficiently serious disciplinary office or a criminal offence.

## 19.0 Data subject rights and access requests

- 19.1 CCTV images of an identifiable natural person are personal data and are covered by the Acts. Anyone who believes that they have been filmed by CCTV or other surveillance technologies is entitled to ask for a copy of the data from the Data Controller, subject to exemptions contained in the Acts. They do not have the right of instant access.
- 19.2 Pebble Beach Omc has a Data Subject Access Request Protocol in place which should be referred to when a request is received.
- 19.3. A person whose image has been recorded and retained and who wishes access to the data must apply in writing to the Data Protection Officer at the registered address 29 Monalea Wood, Firhouse, County Dublin. or by email to pebblebeachomc@yahoo.com
- 19.4 The Data Protection Officer will then arrange for a copy of the data to be compiled and given to the data subject. All communications with the data subject must go through the Data Protection Officer. A response will be provided promptly and in any event within one month of the request having been made, subject to receiving satisfactory proof of identification from the data subject.
- 19.5 The Acts provide the right to refuse a request for a copy of the data in certain circumstances, particularly where such access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders. The application of this right of refusal will be managed by the Data Protection Officer.
- 19.6 If it is decided that a data subject access request is to be refused, the reasons will be fully documented, and the data subject informed in writing, stating the reasons.
- 19.7 The following information should be logged where access is provided:
- Record the reason for disclosure e.g. law enforcement request

- Record the details of the image disclosed i.e. the date, time and location of the image
- Record who was present when the images were disclosed
- Record whether any images were disguised/blurred to prevent identification of individuals other than the data subject
- Record the number of access requests per year

19.8 A third party's personal data (i.e. data relating to an individual who is not the person making the request) should never be released in response to a Data Subject Access Request. Individuals who are not the data subject should be disguised from the footage/images before release, through pixilation, redaction etc. If it is not possible to disguise the images, an external company may be contracted to facilitate this.

19.9 Requests cannot be complied with where there are insufficient details supplied relating to the date and time of recording. Correspondence is to be sent to the requester advising them of this.

19.10 If the data subject wishes to view the images on site, as opposed to a copy being sent, the viewing should take place in a closed office with only the relevant individuals present.

**19.11 Access requests in relation to data processed for law enforcement purposes**

19.12 Subject to certain exemptions, data subjects have the following rights in respect of CCTV used for law enforcement purposes:

- Information rights (i.e. privacy notices and signage indicating that CCTV is in use)
- The right of access, through Data Subject Access Requests
- The right to rectification or erasure
- The right to restrict processing and
- The right not to be subject to automated decision-making

Data subjects do not have the right to object or the right to data portability in respect of processing for law enforcement purposes.

19.13 Under Section 94 of the Data Protection Act 2018, the above rights are restricted, and Pebble Beach Omc may refuse to comply with a request to the extent that is necessary and proportionate in order to;

- avoid obstructing an official or legal inquiry, investigation or procedure;
- avoid prejudicing the prevention, detection, investigation or prosecution of criminal offences or the execution of criminal penalties;
- protect public security;

- protect national security; or
- protect the rights and freedoms of others.

## 20 Access Requests from An Garda Síochána

20.12 In line with Sections 41 and 71 of the Data Protection Act 2018 and guidance from the Data Protection Commission, Pebble Beach Omc may disclose personal data to An Garda Síochána where **necessary** and **proportionate** in relation to the following purposes:

20.13

- For the prevention, detection, investigation and prosecution of crime
- In order to prevent a threat to national security, defence or public security
- When it is required urgently to prevent injury or other damage to the health of a person, or serious loss of or damage to property
- When it is required by, or under any enactment, or by a rule of law or order of a Court.

Requests must be made on the official Garda Data Protection Form, except in extreme emergency situations.

## 21 Security Companies/Data Processors

21.12 Where CCTV or any other surveillance technology is controlled by an external company contracted by Pebble Beach Omc, the following applies:

- Security companies that place and operate CCTV systems or other surveillance technologies on behalf of Pebble Beach Omc are considered to be 'Data Processors'. As Data Processors, they must only act on the instructions of the Data Controller. Articles 28-32 of the GDPR and Part 5 of the Data Protection Act 2018 sets down a number of obligations in respect of Data Processors. These include having appropriate security measures in place to prevent unauthorised and unlawful access to and alteration, disclosure or destruction of the personal data.
- Pebble Beach Omc shall only engage a processor to act on its behalf where:
  - a. There is a **written agreement** in place between the two parties which contains the provisions required by Article 28 of the GDPR or where the processing is for law enforcement purposes, Section 80(2) of the Data Protection Act 2018 **and**
  - b. The Processor provides sufficient guarantees and assurances that it will implement the appropriate **technical and organisational measures** required to comply with the GDPR or Part 5 of the Data Protection Act

2018 (where the processing is for law enforcement purposes) and to protect the rights and freedoms of data subjects.

- The appropriate contractual documentation should be obtained from the DPO in all instances.
- An appropriate level of due diligence from a data protection perspective should be carried out in respect of any Data Processor before their CCTV/security services are engaged.
- Staff of the security company must be made aware of their obligations relating to the security of data.

## **22.0 Purpose Limitation/prohibited use**

22.1 The surveillance technologies operated by Pebble Beach Omc under Part A or Part B of this policy shall not be used for any other purpose than those outlined in 5.0 and 13.0 above or as agreed with the Director of Services.

22.2 In particular, the systems shall not be used:

- To record sound;
- For inappropriate or personal reasons unconnected with the purpose of the surveillance or an employee's role within Pebble Beach Omc;
- For any automated decision making

## **23.0 Policy Review**

23.1 This policy will be reviewed and evaluated yearly. Ongoing review and evaluation will take cognisance of changing information or guidelines, legislation and feedback from staff and others.



**APPENDIX 1**

| PART A                       | LOCATION OF CAMERA   | MAINTENANCE/SECURITY COMPANY |
|------------------------------|--|------------------------------|
| <b>Safety &amp; Security</b> | Pebble Beach<br>Pebble Drive/Walk 2 Camera's<br>1 Vehicle Recognition Camera | CCS Facilities - Tramore     |
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## APPENDIX 2

| PART B                 | LOCATION OF CAMERA | MAINTENANCE/SECURITY COMPANY |
|------------------------|--------------------|------------------------------|
| Bottle Bank & Bin Bays |                    |                              |
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## APPENDIX 4

### SIGNAGE



## WARNING

CCTV CAMERAS IN OPERATION

**Images are recorded for the purposes of securing public order and safety by facilitating the deterrence, prevention, detection and prosecution of offences**

**This scheme is controlled by Pebble Beach Owners Management Company Ltd by guarantee**

**For more information contact 085 8780945**



## **WARNING**

### **CCTV CAMERAS IN OPERATION**

**Images are recorded for the purpose of ensuring the security and safety of its staff, owners and visitors; for crime prevention and to facilitate investigations relating to criminal matters and the investigation of offences.**

**This scheme is controlled by Pebble Beach Owners Management Company Ltd by guarantee.**

**For more information contact 085 8780945**



## **WARNING**

**CCTV CAMERAS IN OPERATION**

**Images are recorded to aid the prevention, detection and prosecution of criminal offences by  
Pebble Beach Owners Management Company Ltd by guarantee**

**This scheme is controlled by Pebble Beach Omc Ltd.**

**For more information contact 085 8780945**

Appropriate locations for signage will include:

- At entrance to estate
- Near recycling banks/bin bays where necessary
- At or close to each external camera

## APPENDIX 5

### Security of CCTV systems and other automated surveillance systems

Before implementing CCTV systems and other automated surveillance Pebble Beach Omc must implement measures which:

- (i) deny access to the equipment used for the processing to any person other than the persons authorised in that regard by Pebble Beach Omc
- (ii) prevent the reading, copying, modification or removal of the data media concerned, other than in so far as is authorised by Pebble Beach Omc
- (iii) prevent the input of personal data/recording of footage other than in so far as is authorised by Pebble Beach Omc
- (iv) prevent the inspection, modification or deletion of the data other than in so far as is authorised by Pebble Beach Omc
- (v) prevent the use of the system by persons using data communication equipment who are not authorised to do so
- (vi) ensure that where a person is authorised to use the system concerned, he or she has access to personal data on the system only in so far as he or she is so authorised by Pebble Beach Omc
- (vii) ensure that it is possible to verify or establish the persons to whom personal data have been or may be transmitted or made available using data communication equipment
- (viii) ensure that it is possible to verify or establish which personal data have been input into an automated processing system, and in relation to such data, to verify and establish the person who input the data and when the data were input,
- (ix) prevent the reading, copying, modification or deletion of personal data during transfers of personal data/CCTV footage or during transportation of data media and equipment, other than in so far as is authorised by Pebble Beach Omc
- (x) ensure that an installed system may be restored in the event of an interruption in the service of the system
- (xi) ensure that the system properly performs its function and the appearance of a fault in the system is reported to Pebble Beach Omc

- (xii)** ensure that personal data that are stored on the automated processing system cannot be corrupted by means of a malfunctioning of the system.