



Brookfield Lawn Tennis Club (BLTC)

CCTV Policy

1. Introduction

This Policy sets out the use of the CCTV system in Brookfield Lawn Tennis Club (hereafter referred to as “BLTC”). It is informed by the principles set out in the General Data Protection Regulation (GDPR), Data Protection Act 2018 and the guidance issued by the Data Protection Commission. This Policy will be kept under review with regard to the system meeting its purposes.

In the operation of its CCTV system, BLTC has the greatest possible regard for the protection of the fundamental rights and freedoms, including the right to privacy, enjoyed by the BLTC community (staff, members and visitors). BLTC exercises care at all times to ensure that the system is not used in any unauthorised or inappropriate manner. BLTC does not believe that there is an alternative way of meeting its objectives and is satisfied that the measures taken are necessary and proportionate.

2. Purpose of CCTV System

The CCTV system has the primary purpose of protecting BLTC property and helping to ensure the safety of the BLTC’S community, consistent with respect for the individuals' privacy.

The CCTV system at BLTC assists the following purposes in a proportionate manner:

- safeguarding the personal safety of all persons on site;
- safeguarding of property;
- maintenance of security on site;
- investigation of staff disciplinary offences, where necessary, under BLTC policy.

3. Legal Basis for Processing

BLTC relies on Article 6(1)(f) of the GDPR for its lawfulness of processing, relying on its legitimate interests in accordance with the purposes as set out in this policy.

BLTC considered the rights and freedoms of the data subjects whose data is captured on the CCTV cameras and believes that its legitimate interests override those rights and freedoms of data subjects. As the cameras are not located in any high risk areas (such as changing rooms or bathrooms), BLTC believes that there is minimal impact on the data subjects in terms of data that is captured.



The BLTC's CCTV system comprises of internal and external CCTV cameras located around the site, which can be monitored from the Club Manager's office.

Location of cameras & monitors

Internal areas that the CCTV covers:

- hallway/lobby
- behind the bar
- lounge
- function room

External areas the CCTV covers:

- front gate and car park
- front patio and path to the pedestrian gate
- 3 camera's covering the six courts
- Side gate entrance and storage sheds

There are no other cameras on the premises.

Signs are placed prominently at strategic points at entrance and exit points of the site and in the building; to advise staff, member and visitors of the presence of the CCTV system.

4) Data Controller

Data Protection Law requires that a Data Controller has responsibility to ensure that personal data generated and processed as a result of the operation of CCTV system is processed in a manner that is compliant with the Acts., keeping personal data private and safe. Brookfield Lawn Tennis Club is the Data Controller of these processing activities.

5) Retention

The signals received from the cameras are recorded on digital video recorders (DVRs) and the recordings are retained on the DVRs for a period of 28 days, after which they are automatically erased. Where relevant images are required to be downloaded, for example in relation to an incident, the recording shall be saved as a digital file and stored either on the BLTC office computer or mobile phone. All hard drives and recorders shall remain the property of BLTC until disposal and destruction.

6) Access to CCTV Systems and Recordings

Access to the CCTV system and recording is restricted in accordance with appropriate organisational and technical measures to comply with the GDPR.

Recorded material containing personal data will only be released in the following circumstances and processed by the Club Manager:

- A formal request from a member of An Garda Síochána;



- A requirement under any enactment, rule of law or court order to disclose the images;
- Where a valid data access request is made by an individual for a copy of their own personal data under Data Protection Law.

7) Exercising your rights in relation to personal data
CCTV digital images, if they show a recognisable person, are personal data within the meaning of the General Data Protection Regulations. Anyone who believes that they have been recorded by CCTV is entitled to ask for a copy of that data, subject to exemptions contained in Data Protection Law. A person whose image has been recorded and retained and who wishes access to their personal data in accordance with Article 15 of the GDPR should apply in writing or email to the Brookfield Lawn Tennis Club (Club Manager) manager@brookfieldtennis.com, setting out any relevant dates and times so that the request can be facilitated as easily as possible.

8) Enquiries

The contact point for members of the BLTC community or members of the public wishing to enquire about the CCTV system, or to exercise any of their data protection rights, is:

Club Manager, Brookfield Lawn Tennis Club

Palmerston Park, Dublin, D06 EY73

Email manager@brookfieldtennis.com and mark "Data Protection" in the subject box

If you wish to make a complaint to the Data Protection Commission, their contact details are:

Data Protection Commission

21 Fitzwilliam Square, Dublin 2

Approved by the BLTC Committee on 17th July 2025