

# Glen Oaks Co-op

Glen Oaks Co-operative Homes Inc.

## GLEN OAKS CO-OPERATIVE HOMES INC.

### VIDEO SURVEILLANCE POLICY

December 7<sup>th</sup>, 2020

#### 1. POLICY PURPOSE

The purpose of the policy is to set out clear rules and how the Co-op collect personal information by video surveillance, its use, access, storage, and disposal.

The Co-op collects maintains a video surveillance system for the purpose of:

- Increasing safety and security of members, staff of the manager, contractors, guests, and visitors of the co-op
- Protecting the Co-op's assets and property
- Detecting and deterring criminal activity and vandalism

#### 2. DEFINITIONS

2.1 **Personal Information** – recorded information about an identifiable individual, which includes, but is not limited to, information relating to an individual's race, colour, national or ethnic origin, sex and age. If a video surveillance system displays these characteristics of an identifiable individual or the activities in which he or she is engaged, its contents will be considered "personal information".

2.2 **Video Surveillance System** – a video, physical or other mechanical, electronic, digital or wireless surveillance system or device that enables continuous or periodic video recording, observing or monitoring of personal information about individuals in open, public spaces.

2.3 **Storage Device** – a videotape, computer disk or drive, CD ROM, computer chip or other device used to store the recorded data or visual, audio or other images captured by a video surveillance system.

2.4 **Designated Staff of the Manager** – Staff members of the Manager that are designated by the Board to have access to the Co-op's video surveillance system and storage devices.

2.5 **Personal Information Privacy Officer** – A member of the Co-op as outlined in the Co-op's Privacy Policy.

### **3. COLLECTION OF PERSONAL INFORMATION**

3.1 Protection of Personal Information recorded by the Co-op's video surveillance system will comply with the Personal Information Protection and Electronic Documents Act, 2011, the Co-op's Privacy Policy and all relevant laws and regulations and the Co-op's By-laws and Policies.

3.2 Personal information as collected and recorded by the Co-op's video surveillance will only be used for the purposes set out in this policy and protected to avoid unauthorized access and disclosure.

3.3 Notices will be posted at each entrance to the building identifying:

- The purpose of the Co-op's use of cameras on the premises
- The location of each camera (as per Appendix 1)
- Contact information for a Designated Staff of the Manager who can answer questions about the video surveillance system

### **4. USE AND ACCESS OF PERSONAL INFORMATION**

4.1 The Board will designate Staff of the Manager that will have access to the Co-op's video surveillance system and storage device.

4.2 Personal information as collected and recorded by the Co-op's video surveillance will only be used for the purposes set out in this policy. In particular, the video surveillance will not be continuously monitored (not "watched" in real-time), and will only be viewed in accordance with this Policy.

4.3 Personal information may be disclosed to Canadian law enforcement agencies to aid in investigation.

4.4 In the event of a reported or observed incident, the review of recorded information may be used to assist in the Co-op's investigation of the incident and may be accessed by designated staff of the Manager and Personal Information Privacy Officer. In the paragraph, "incident" means an incident that is related to the purpose of this Policy, as set out in paragraph 1 and, without limiting this general meaning, may include damage to property, breach of Co-op By-laws and policies, disturbances and threats to health, safety or security of people.

4.5 Individuals have a right to access images relating to them only at the written request by the individual. When disclosing recording to individuals who appear in them, the Co-op must ensure identifying information about any of the other individuals on the recording is not revealed. This may involve the use of masking technology. The cost of the masking technology will be at the expense of the member making the request. The individual making the

request will be notified that if the video is redacted that they will only be able to identify themselves and not the other parties. If they would like a full copy of the video, they will need to obtain a court order or seek permission from everyone seen in the footage. The cost will be determined with a quotation for each incident.

4.6 Any disclosure will be documented in a log and reported to the Co-op's Personal Information Privacy Officer and the Board of Directors.

4.7 Access to the storage devices where the recorded personal information is retained is only permitted by Designated Staff of the Manager and/or the Personal Information Privacy Officer. The storage device will be secured by a password and will be located in a locked office. The monitor showing camera video feeds will not be accessible by anyone other than the Staff of the Manager and Privacy Officer.

## 5. RETENTION

5.1 Personal information will only be retained as long as necessary to fulfill the purposes for which it was collected pursuant to this policy, or otherwise as permitted or required by law. If a decision is made by the Co-op about a member based on their Personal Information collected, that was collected used or disclosed under this policy, that Personal Information shall be retained for a period of at least 60 days following the date the decision was made.

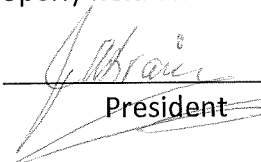
5.2 Personal information that has not been collected, used, or disclosed for the purposes set out in s.4 of this policy will be disposed of, in accordance with s.6 of this policy, no more than 14 days after recording.


## 6. DISPOSAL

6.1 Storage devices containing personal information will be securely disposed of in a way that the personal information cannot be reconstructed or retrieved. This may include shredding, magnetically erasing or deleting with third party software from the hard drive. Hard drives will be mechanically destroyed to ensure inoperability and unreadability. Storage devices will not be donated or sold after disposal.

6.2 A written disposal record will be maintained detailing the date and time and method used to dispose of each storage device.

Policy Approved by the Board of Directors of Glen Oaks Co-operative Home Inc. at a meeting properly held on **December 7<sup>th</sup>, 2020.**

  
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President

  
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Corporate Secretary