

Clare County Council Privacy Notice

Traffic Survey in connection with road design and construction

| DOCUMENT NO. | REVISION NO. | DETAILS | EFFECTIVE DATE |
|--------------|--------------|---|----------------|
| DP-PN-01 | 1 | Clare County Council Traffic Survey in connection with new road design and construction | May 2022 |

The purpose of this privacy notice is to describe, in clear and concise terms, the personal data that the County Council's traffic survey is processing, why it is needed, how it is used and how individuals may interact with the Council in relation to personal data and traffic surveys for road design and construction. It also outlines the rights of individuals under data protection legislation in relation to the processing of their personal data.

The council also has a Privacy statement which is a general document about how we approach data protection as an Organisation and is available on the council's website <https://www.clarecoco.ie/info/privacy-statement/> or on request from this council.

Contact details for the data controller:

The identity and the contact details of the controller:

- Clare County Council, New road, Ennis, Co Clare [Tel: 065 6821616](tel:0656821616)
Email: customerservices@clarecoco.ie : website: www.clarecoco.ie

The contact details of the data protection officer

- Data Protection Office: Telephone: 065 6846405 email: DPA@clarecoco.ie

Purpose of Clare County Council's Traffic Survey

Cameras are being used by a company contracted by Clare County Council to carry out a traffic survey on the 10th of May 2022 to inform the design of the N19 Shannon Airport Access Road Improvement Scheme. 13 No Traffic Survey Cameras will be installed adjacent to the N19 National Road between Drumgeely Roundabout and Knockbeagh Point Roundabout for a duration of 12 hours from 06:30-18:30. GPS Coordinates for the Camera locations are shown in the Table below, as per the map attached below.

| Survey Type | Ref | Coordinates | |
|---|-----|--------------------------|--------------------------|
| | | Longitude (Degrees East) | Latitude (Degrees North) |
| Automatic Number Plate Recognition (ANPR) for journey time measurement | A | -8.9130 | 52.6893 |
| | B | -8.8880 | 52.7089 |
| Video Junction Turning Counts (JTC) including pedestrian movements and queue length surveys for junction operation assessment | 1 | -8.9139 | 52.6890 |
| | 1a | -8.9132 | 52.6893 |
| | 2 | -8.9118 | 52.6896 |
| | 3 | -8.9007 | 52.6961 |
| | 3a | -8.9000 | 52.6975 |
| | 4 | -8.8994 | 52.6983 |
| | 5 | -8.8956 | 52.7037 |

| | | | |
|--|---|---------|---------|
| | 6 | -8.8935 | 52.7029 |
| | 7 | -8.8915 | 52.7029 |
| | 8 | -8.8845 | 52.7132 |
| | 9 | -8.8749 | 52.7250 |

This use involves the processing of personal data, namely vehicle registration numbers. The Council is obliged to protect such personal data in accordance with the Data Protection Act 2018 and the provisions contained in the General Data Protection Regulation (GDPR) which came into effect in May 2018.

The 13 No. traffic cameras are deployed in connection with a localised and short-term traffic survey. The cameras will process data in order to:

- Generate anonymised traffic profile information to inform a detailed Traffic Model
- Design junction improvements

Legal bases for Clare County Council's use of traffic camera for a road survey in connection with road construction

The legal basis for Clare County Council's use of CCTV systems to process personal data consists of any one or more of the following:

- Article 6(1) (c) GDPR. The processing is necessary for compliance with a legal obligation to which Clare County Council is subject; e.g. Health, Safety & Welfare at Work Acts.
- Article 6(1) (e) GDPR
The processing is necessary for the performance of a task carried out in the public interest or in the exercise of an official authority vested in Clare County Council; e.g. Under the following sections of the Roads Act 1993;
 - Section 13 - Responsibility of road authorities for the maintenance and construction of public roads.
 - Section 78 - Powers of inspection.

The categories of personal data concerned:

Personal data processed by the camera for traffic survey consist of the following:

- Vehicle number plates will be read by cameras and instantaneously converted irreversibly into anonymised codes.
- Anonymised (i.e. low resolution) images of vehicles, bicycles and pedestrians will be captured whereby individuals are not recognisable, but the type of traffic (bike, car, truck, pedestrian) can be distinguished.

Processing and recipients of the data

The personal data (i.e. number plate) is being irreversibly anonymised instantaneously by 2 No. ANPR (automatic number plate recognition) cameras. This conversion of number plates by these cameras into anonymised codes means that no personal data is being collected or retained by the survey.

Video footage to classify traffic types/numbers at junctions, including pedestrian movements will be taken by 11 No. JTC (junction turning count) cameras, but at such a resolution and height as to block capacity for personal identification in any image recorded. Personal data is therefore not being gathered from the survey, but rather, anonymised data.

The Council has a data processing agreement in place with the traffic survey company who will act as processor of the data.

The retention period for CCTV data:

No PID information will be provided as part of the survey results therefore there is not a requirement to delete the information within a specified timeframe. The data recorded on the cameras is anonymised data and will be retained by the company for the minimum period so that the necessary detail can be attained to inform the traffic model. Once this has been completed the data can be securely destroyed.

Data subjects have a range of rights under GDPR:

- Right of access by the data subject
- Right to rectification
- Right to erasure ('right to be forgotten')
- Right to restriction of processing
- Right to data portability
- Right to object and automated individual decision-making

The right to lodge a complaint with the supervisory authority

If you are not satisfied with a decision on your request for access to data or to exercise your data protection rights, it is open to you to make a complaint to the Data Protection Commission, Canal House, Station Road, Portarlinton, Co. Laois, Ireland. Before doing so it is recommended that you contact Clare County Council (DPA@clarecoco.ie) to establish the circumstances and to indicate your intention to complain to the Data Protection Commission's Office. We may be in a position to resolve the problem in a timely manner. If you are not satisfied with our response, or if you do not receive a response, at that point you could make a formal complaint to the Data Protection Commission's Office.

The Data Protection Commission website www.dataprotection.ie has further details and the forms that are required to be completed if you wish to raise a concern or make a complaint.

Appendix – Maps Identifying location of traffic survey cameras



Background mapping is © **OpenStreetMap contributors** under the Open Database License. (See openstreetmap.org or opendatacommons.org for details).

