



GRANITE CLUB

1875

VIDEO SURVEILLANCE POLICY

The Granite Club (the “Club”) has an overt video surveillance system, which includes several surveillance cameras throughout the facilities of the Club. The cameras were installed for safety, security, and risk management reasons.

The cameras are out in the open and are in the plain view of the public. They are located throughout the public spaces of the property and never in locker-rooms or restrooms. However, as these cameras capture video footage as well as “personal information,” the Club has developed this Video Surveillance Policy to ensure that its privacy obligations are abided by, in accordance with the Personal Information Protection and Electronic Documents Act (Canada) and the Club’s Privacy Policy.

INDIVIDUAL ACCOUNTABLE FOR PRIVACY COMPLIANCE WHO CAN ANSWER QUESTIONS ABOUT THIS POLICY (“PRIVACY OFFICER”)

1. John Gravett, Chief Executive Officer
ceo@graniteclub.com

PUBLIC SIGNAGE

2. A sign with the following message is prominently displayed at the driveway entrance of the Club and pedestrian walkway:

“Video surveillance in use.”

There are also signs at the Employee and Main entrances to the Club with similar messaging.

PURPOSES OF SURVEILLANCE SYSTEM

3. The purpose of the video surveillance system is to enhance safety, security, and risk management with respect to activity that takes place in the Club. It may also be used in limited circumstances for Member or Employee investigative purposes.

CONSENT

4. Through the public signage with respect to the surveillance system and through this policy, all people who enter the Club acknowledge and agree to the collection, use and disclosure of their personal information for the purposes set out in this policy. If any person objects to the collection, use or disclosure of their personal information for the purposes set out in this Policy, they must contact the Privacy Officer and state their objection.

LOCATION AND FIELD OF VISION OF SURVEILLANCE SYSTEM

5. The surveillance video cameras are located throughout the public spaces of the Club, capturing video footage within those areas.

SPECIFICATIONS OF THE SURVEILLANCE SYSTEM

6. The surveillance system is a basic system, without any special capabilities. The surveillance system only records video, not audio.

PERSONNEL AUTHORIZED TO OPERATE THE SURVEILLANCE SYSTEM AND ACCESS THE INFORMATION IT CONTAINS

7. Operation of the surveillance system from the control room and access to the information that it contains is restricted to authorized personnel, including the Privacy Officer. Such authorized personnel will be selected in writing by the Privacy Officer.

SURVEILLANCE TIMES

8. The surveillance system is turned on and capable of recording at all times to record any incident that may occur. The surveillance system is activated by movement and deactivates when there is no movement.

SIGNALS FROM THE EQUIPMENT

9. Signals from the equipment will be received and monitored in an access-controlled, secure location, known to the Privacy Officer and authorized personnel.

GUIDELINES FOR MANAGING RECORDINGS OF THE SURVEILLANCE SYSTEM

10. The Club will maintain control of and responsibility for the surveillance system at all times. All Employees and Contractors of the Club must review and comply with this Policy.
11. The recorded images will be stored on a dedicated security network, that only the Privacy Officer and authorized personnel have access to. The recordings are only to be used and disclosed in a manner consistent with the purpose of the surveillance system.
12. Individuals have the right to access images containing their personal information. As such, if an individual requests a recording of him/herself, the individual will be given the right to access the recording, with the personal information of other identifiable individuals removed, subject to payment of certain fees and charges by the individual.
13. Should the Club determine that video surveillance recordings must be disclosed outside of the Club, the Club's reasons will be justified and documented, in accordance with the applicable law.
14. Video recordings will only be kept as long as necessary to fulfill the purpose of the video surveillance/recording. Any recordings that are no longer required will be destroyed and the Club will ensure that the destruction is secure.

SECURE DISPOSAL OF VIDEO RECORDINGS

15. When it is determined that recordings are no longer required, the recordings will be destroyed in a manner that ensures that personal information is erased prior to disposal and that the personal information cannot be retrieved or reconstructed. Disposal methods may include shredding, burning or erasing.

UNAUTHORIZED DISCLOSURE OF IMAGES

16. Should images be disclosed when there has been no authorization to do so, the following procedures shall be followed:
 - (a) Upon confirmation of the existence of a privacy breach involving personal information that may lead to a real risk of significant harm, the Privacy Officer will notify the Privacy Commissioner of Canada ("OPC") and any impacted individuals;
 - (b) The Privacy Officer shall investigate the cause of the disclosure with the goal of eliminating potential future occurrences;
 - (c) The Privacy Officer shall take all reasonable actions to recover the record and limit the record's disclosure; and
 - (d) The Privacy Officer, where required, shall notify affected parties whose personal information was inappropriately disclosed.

SANCTIONS FOR EMPLOYEES AND CONTRACTORS FOR FAILING TO ADHERE TO THIS POLICY

17. For Employees of the Club, a breach of this Policy will result in disciplinary action up to and including termination for cause.
For Contractors of the Club, a breach of this Policy will result in penalties up to and including the termination of their contract.

PROCEDURES FOR INDIVIDUALS TO ACCESS PERSONAL INFORMATION CAPTURED AND CHALLENGE ANY SUSPECTED FAILURE TO COMPLY WITH THE POLICY

18. All formal requests for video records should be directed to the Privacy Officer.
19. Reports of any suspected failure to comply with the policy should be directed to the Privacy Officer.

REVIEW OF POLICY

20. This Policy will be reviewed and updated every two (2) years or sooner if there is a change or upgrade to the surveillance system or applicable laws or regulations.