

CCTV Policy for Common Pool Area

Green Village Grand Gaube — Syndicat de Copropriétaires

Purpose

This Policy sets out the Syndicat's rules for the installation, operation, access, retention and security of closed-circuit television (CCTV) systems covering the common pool area and immediate access routes at Green Village Grand Gaube. Its objectives are to enhance safety, deter vandalism and assist in incident investigation while protecting co-owners' privacy and ensuring compliance with applicable law.

Scope

This Policy applies to:

- All CCTV cameras and recording equipment installed by or on behalf of the Syndicat that monitor the common pool, pool entry/exit points, and adjacent common walkways;
- All recorded footage, still images and system logs;
- All persons authorised to access, manage or act on CCTV footage, including the Syndic and authorised committee members.

Principles and Limits on Use

- Cameras shall be positioned and focused exclusively on common areas. Cameras must not record inside private residences, balconies, windows, internal doors, private gardens or other private spaces.
- CCTV shall be used only for legitimate Syndicat purposes: safety, prevention and detection of criminal or antisocial behaviour, protection of communal property, and the investigation of incidents involving the Syndicat or its members.
- Footage shall not be used for monitoring individuals for purposes unrelated to Syndicat duties (for example employment performance or neighbour disputes outside an investigated incident).

Governance and Responsibilities

- Data controller: *Syndic of Green Village Grand Gaube* (Syndicate of Green Village Grand Gaube, thesyndicategreenvillage@outlook.com, Tel +23058474313)
- Operational responsibility: Syndic assisted by up to two authorised committee members appointed by the General Meeting. A register of authorised persons will be maintained.
- Supplier responsibility: Any third-party supplier must enter a written agreement including data protection, encryption, access controls, confidentiality and service levels.

Access, Disclosure and Request Handling

- Access to live feed or stored footage is restricted to the Syndic and the authorised committee members. All access must be logged (who, why, date/time).
- Footage will be disclosed to the police or other competent authority only on receipt of a formal request or as required by law. Any other disclosure to third parties (including a co-owner requesting footage) requires written approval by the Syndic and will be limited to relevant extracts with redaction where necessary.
- Requests for access to footage by co-owners must be submitted in writing; the Syndic will assess and respond within a reasonable timeframe and only if disclosure is consistent with this Policy and applicable law.

Retention and Deletion

- Standard retention period: *14 days* from recording, unless retained longer for a bona fide ongoing investigation, formal legal process, or request by law enforcement.
- After the retention period footage will be securely deleted or overwritten. Any exception must be documented with justification and retention end date.

Security and Technical Safeguards

- Recorded footage will be stored on encrypted storage with access restricted to authorised personnel. Admin credentials are limited, stored securely and changed regularly.
- Remote access (if any) will require multi-factor authentication and be limited to authorised devices.
- The Syndic shall ensure regular backups, firmware updates, and secure configuration of cameras and recorders to reduce risk of unauthorised access or data loss.

Signage and Notices

- Clear, legible signage stating that CCTV is in operation, the purpose of monitoring and the Syndic contact details will be posted at all pool entrances and other appropriate points.

Accountability, Audit and Review

- All access logs, disclosure records and any incidents involving CCTV will be retained and made available for audit by the General Meeting on request.
- The Syndic will review this Policy annually and after any significant change to camera placement, technology or applicable law. Proposed material changes shall be tabled at a General Meeting for approval.

Complaints and Breaches

- Suspected misuse, data breaches or complaints regarding CCTV must be reported to the Syndic in writing. The Syndic will investigate promptly, notify affected co-owners as required by law, and take corrective measures.
- Significant breaches or disputes may be escalated to the General Meeting for determination.

Adoption

This Policy was adopted by the General Meeting of Co-owners on 21st February 2025. It becomes effective on that date and remains in force until varied or revoked by a subsequent General Meeting.

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