

Electronic/Digital Surveillance System Policy

Electronic/digital surveillance refers to video-digital (no audio) surveillance system or device that enables continuous or periodic video recording, observing or monitoring of individuals on property in the Slopes community.

1) Policy Statement

The Slopes Community Association (“TSCA”) has implemented electronic surveillance to promote the safety and security of residents, owners, guests, service personnel, visitors and TSCA property, and to aid in the deterrence and prevention of criminal activities. All electronic surveillance is digital and does not record audio.

2) Purpose of Electronic Surveillance

The purpose of the electronic surveillance by TSCA is to:

- Enhance the safety and security of residents, owners, guests, service personnel and visitors to the Slopes community (the “Slopes”);
- Deter theft and vandalism and assist in the identification of individuals who commit damage to property within the Slopes;
- Promote a safe environment by deterring acts of violence, harassment or assault within the Slopes; and
- Assist law enforcement agencies with regards to the investigation of any crime and aid in identifying intruders or persons breaking the law while in the Slopes.

3) Use of the Surveillance System

Surveillance camera equipment has been set up to record activity at Specified Locations (as defined below) in the Slopes. The images are only viewed by a Designated Individual (as defined below) if an incident requiring investigation occurs.

a. Surveillance Camera Specified Locations

Surveillance cameras may be located anywhere in the Slopes, other than the exclusions outlined below, but are often located in the following Slopes areas:

- At or near mailboxes
- Monitoring the vehicle entrance(s) and exit(s)
- Monitoring pedestrian/bicycle entrance(s) and exit(s).

Exclusions: Cameras are not intended to capture events on or in residents’/owners’ private property. Every effort will be made to ensure cameras are placed to avoid inadvertently recording images of private land areas.

b. Recording Operations

Recording of images (“**Recordings**”) are continuous (24 hours). All images are retained in a self-contained hard drive that has no external connection to a Wi-Fi, cellular or hard wired viewing system. Images are stored on the 3 Terabyte hard drive, and once the hard drive is full, the earliest Recordings will be overridden, resulting in Recordings being retained for approximately 30 days.

4) Responsibility for, Retention of, and Disclosure of Video Records

a. Responsibility for Recordings

TSCA’s volunteer Board of Directors (the “**Board**”) and community manager(s) are responsible for managing and auditing the use and security of the electronic surveillance cameras, monitors, and digital recordings, computers used to store the images, and all other electronic surveillance equipment & records. The Board and the community manager(s) shall be responsible for implementing and maintaining (or ensuring that a third party service provider implements and maintains) appropriate physical, organizational and technological safeguards to protect confidentiality and integrity of the Recordings. These safeguards include the restriction on access to the Recordings, auditing, retention and secure destruction of storage devices and Recordings, all in accordance with this policy.

TSCA shall use appropriate measures to secure the cameras and related hardware devices and install them in locations that are difficult to access by the public. TSCA may engage personnel and security services providers to operate and maintain the surveillance systems as prescribed in this policy.

Only the following individuals are permitted to access controls and Recordings and only for the purposes set out in this policy. These include:

- the Community Managers;
 - the President of the Board; and
 - the IT Facilitator of the Board, if such a position has been appointed,
- and other such individuals as appointed by the Board from time to time (collectively, the “**Designated Individuals**”); provided that in the event that a Community Manager is the Designated Individual who is accessing the controls and Recordings, they shall be required to be accompanied by another Designated Individual.

When a person no longer holds a Designated Individual position that requires access to video records, access will be promptly removed from that individual (within one (1) week of formal change of position.)

The President of the Board and the Chair of the Corporate Governance Committee are responsible for ensuring TSCA’s adherence to any applicable legislation including but not limited to: Alberta’s *Personal Information Protection Act* and the federal *Personal Information Protection and Electronic Documents Act*. The Board shall review and assess the electronic surveillance program in the Slopes and this policy at least annually to ascertain if the surveillance and Specified Locations are still appropriate.

b. Retention and Disposal of Recordings

Recordings will be overwritten after 30 days, unless required to be retained longer in accordance with this policy, and securely destroyed in compliance with Alberta’s *Personal Information Protection Act*, the federal *Personal Information Protection and Electronic Documents Act* and any other applicable

regulations. All old or non-functioning storage devices will be disposed of in a secure manner so that any Recordings they hold cannot be retrieved or reconstructed.

c. Disclosure of Recordings

The President of TCSA must ensure that the appropriate written form is completed before disclosing Recordings to appropriate authorities or third parties. The written form shall include information on the individual or organization who is requesting the Recording, the date of the occurrence and when and if the Recording will be returned or destroyed by the authority or individual after use. In the event that the requested disclosure is for a purpose permitted by this policy, and that the request is in full compliance with this policy, the President may approve the same. In the event that that President is uncertain as to whether a requested disclosure of a Recording is in compliance with this policy, the President shall refer the matter to the Board for a determination.

If it is determined that a disclosure of a Recording may be made under this policy, such Recording shall be downloaded to an appropriate storage device (such as a USB memory stick) and immediately turned over to the appropriate authority or third party. TCSA shall have the right to request payment from the requesting party to cover all expenses incurred by it in disclosing such Recording (including, without limitation the cost of a storage device).

TCSA shall not use video monitoring for purposes other than the purposes expressed in this policy unless authorized by law.

d. Access by Individuals to Personal Information on Recordings

An individual who is the subject of video monitoring may request access to the Recording in accordance with the provisions of Alberta's *Personal Information Protection Act* and the federal *Personal Information Protection and Electronic Documents Act*. The Board shall consider such requests and access in full or in part may be granted or refused.

e. Violation of Policy

Any violation of this policy will be investigated by the Board and will be addressed through appropriate action, which may include the identification of individuals involved in the violation to affected individuals, termination of contractual relationships with TCSA, disclosure of information to law enforcement or civil action, as appropriate.

5) Notification of Electronic/Digital Surveillance

a. General Signage

TCSA shall posts signs informing residents, owners, guests, service personnel, and the general public that the Specified Locations are monitored by surveillance equipment, which signs shall be prominently displayed at the perimeter of the surveillance areas and at the entrances to the Slopes, in order to provide reasonable and adequate warning that Recordings are being undertaken.

The sign informs residents, owners, guests, service personnel, and the general public of:

- the hours during which the surveillance is conducted

- who within the organization is responsible for conducting the surveillance, and their contact information
- who can answer questions about the surveillance policy system, and their contact information
- where this **Electronic/Digital Surveillance System Policy** can be accessed and reviewed.

b. Resident, Owner, and General Public Communication

TSCA's **Electronic/Digital Surveillance System Policy** is posted on TSCA's public website. One (1) week in advance of the initial implementation of this policy on November 1, 2020, a copy of the policy was emailed to all residents and owners of property in the Slopes.