

Video Camera Usage & Privacy Protection Policy

The purpose of this policy is to provide rules and guidelines regarding the usage of all video camera, and related, equipment installed by Royal City Housing Co-operative. The video camera system is intended solely to support the safety and security of residents, guests, and the Co-op's property.

The Co-operative recognizes that video surveillance involves the collection of personal information and is committed to protecting residents' privacy in accordance with applicable privacy legislation.

1. Compliance with Privacy Legislation

The Co-operative shall comply with all applicable privacy laws and regulations, including:

- The Personal Information Protection & Electronic Documents Act (PIPEDA)
- Any applicable Ontario privacy legislation, regulations, or guidance

All collection, use, disclosure, retention, and safeguarding of video footage will be carried out in a manner consistent with these legal obligations.

2. No Active Monitoring

The video camera system is not actively or continuously monitored, and live feeds are not routinely viewed.

Recorded footage will be accessed only when necessary, such as in response to:

- A reported safety or security incident
- Damage, theft, or vandalism
- A legal, insurance, or law enforcement request

3. Reasonable Expectation to Privacy

The Co-operative acknowledges residents' right to a reasonable expectation of privacy. Accordingly:

- Footage will not be used to resolve personal disputes unless directly related to a legitimate safety or security concern.
- Surveillance will be conducted in a manner that minimizes intrusion on residents and guests.

4. Access Control and Confidentiality

Access to the video camera system and/or recorded footage is limited to individuals specifically authorized by the Board of Directors.

Authorized individuals must:

- Access footage only in accordance with this policy
- Maintain strict confidentiality
- Refrain from copying, sharing, or distributing footage except as permitted by law and/or this policy

Any unauthorized access or disclosure constitutes a serious breach of policy and may result in disciplinary action and/or legal consequences.

5. Resident Rights

In accordance with PIPEDA, and applicable Ontario privacy requirements, residents have the right to:

- Be informed that video surveillance is in use
- Understand the general purpose for which personal information is collected
- Request access to personal information about themselves, subject to legal limitations and the privacy rights of others
- Request correction of personal information where applicable

Requests related to video footage will be reviewed on a case-by-case basis. Residents do not have an automatic right to receive copies of video recordings, and access will be limited or denied where disclosure would unreasonably infringe on the privacy of others.

6. Disclosure to Third Parties

Video footage may be disclosed only when:

- Required or reasonably necessary for proceedings before the Ontario Landlord and Tenant Board (LTB)
- Required by law or lawful authority
- Requested by law enforcement in connection with an investigation
- Necessary for insurance claims or legal proceedings

Any disclosure will be limited to the minimum amount of footage reasonably necessary for the stated purposes. Disclosures will take into account the privacy rights of other individuals captured in the footage, and reasonable measures including redactions on still images and restricted viewing of videos will be implemented where appropriate.

7. Retention and Safeguards

Video footage is stored on the secure hard drives that form part of the Co-op's video camera system. Retention periods may vary depending on the specific camera, system capacity, and recording settings.

Footage is automatically overwritten or deleted in the normal course of system operation once the applicable retention period is reached, unless it has been identified as required for a permitted purpose under this policy.

Video footage will be accessed and downloaded only when necessary for purposes permitted under this policy, including those set out in Section 6. Disclosure to Third Parties.

Once downloaded, footage will be securely stored and retained for as long as deemed necessary to fulfill the identified purpose.

Appropriate physical, technical, and administrative safeguards will be used to protect both stored and downloaded footage against unauthorized access, use, disclosure, alteration, and/or loss.