# **Basilica Cathedral Privacy Policy**

## Closed Circuit TV, Livestreaming, Surveillance, Website and Data Collection Privacy Notice

This document explains what to expect when the Basilica Heritage Foundation collects static or moving imagery via its live-streaming and Closed Circuit TV systems, when you visit and pass through the Basilica Cathedral and its associated properties.

### **Materials**

Any photographs, documents, video clips, graphic designs, textual content or other materials on the website or the YouTube channel of the Basilica Heritage Foundation Inc. may not be used by any corporation or individual without the express written consent of the Basilica Heritage Foundation Inc.

## Consent

In your use of this website you agree to be bound by this Privacy Policy. When you submit information via this website you consent to the collection, use, disclosure and storage of such information in accordance with this Privacy Policy. Additionally, you may receive e-mails from time to time informing you of the work of the Basilica Heritage Foundation and its activities.

## Links on this website to other websites

This website may collect information from its visitors by permitting you to communicate directly with us via e-mail. Some of the information you submit may identify you, such as your name, address, e-mail address, telephone number, etc. You therefore consent to us using this information to contact you in relation to your inquiries. We may also collect static or moving imagery using closed-circuit television or surveillance systems. We will only ever use your information in conformity with applicable data protection laws, including the laws of the Parliament of Canada and the House of Assembly of Newfoundland and Labrador. We do not sell, reveal or share your personal data with any commercial entity.

## Why?

We are committed to protecting your safety and security, as well as your personal information, whenever you visit us.

#### Where are the cameras?

We collect video imagery with sound via livestreaming and CCTV cameras and surveillance devices located in public locations of the Basilica Cathedral, the offices of the Archdiocese of St. John's and the Basilica Parish, the Episcopal Library, the Parish and Sacristy Annexes, and other public areas of the complex.

## How is this information used?

The lawful justification for collecting imagery is that there are **legitimate interests** to do so. We may use the imagery for a number of purposes, including:

• Livestream broadcasting of Masses, Liturgies and other religious services which take place in the Basilica Cathedral;

- Extracting video clips of the livestream during the times of Masses and liturgies and other events in the Basilica Cathedral and posting these for public viewing on YouTube;
- Maintaining the safety and security of our staff, congregations, supporters, and visitors;
- Supporting effective management of the Archdiocese of St. John's, the Basilica Parish and the Basilica Heritage Foundation's operations;
- Investigating incidents; and
- In response to an Access Request.

#### Who will see it?

We'll keep your information within the Basilica Heritage Foundation and our trusted service provider/third parties, except where disclosure may be required by law, e.g. to the Police or government bodies, or in response to a request or a complaint.

Imagery is retained in a secure environment, and it may only be handled and used by the Executive Director, staff and IT support staff of the Basilica Heritage Foundation Inc. to maintain safe, secure and efficient operations.

#### How long will it be kept?

The livestream system of our television cameras used to livestream Mass, if turned on, digitally retains information for up to 8 hours after which it is automatically deleted and replaced by new information. Our security and CCTV systems digitally retain information for anywhere from 4 calendar days for external camera footage to 30 days for internal camera footage before it is automatically deleted. Imagery required for investigative or evidential purposes (e.g. investigating a complaint) may be retained beyond that period, but it will be securely disposed of, upon completion/conclusion of that purposes.

#### Your data rights

You have the right (where appropriate) to A) access your personal data, if it still exists given the conditions under which our systems record data (as described above), by making an Access Request; B) Rectification, erasure or restriction of your information if such has been collected and exists; or C) Object to the processing of your information. To exercise your data rights please write The Basilica Heritage Foundation at The Basilica Heritage Foundation Inc., 200 Military Road, St. John's, Newfoundland Canada A1C 2E8 or e-mail: bhf.inquiries@thebasilica.net

#### What if that is not good enough?

Should you find our response unsatisfactory, you retain the right to lodge a complaint with the Office of the Information and Privacy Commissioner of Newfoundland and Labrador, who is an officer of the House of Assembly of Newfoundland and Labrador. Kindly note that we are not a government entity and therefore as a private corporation and Registered Canadian Charity we comply voluntarily with direction provided by the Privacy Commissioner as a matter of best practice. More information about the complaints process is on the Commission's website at: https://www.oipc.nl.ca/contact

We commit to review this privacy notice annually and post updates here. The Basilica Heritage Foundation, Inc., Date of last update: 1 November 2023.