

## Introduction

The purpose of this Policy is to regulate the management, operation and use of the closed circuit television system ("CCTV" or "system") at The Hebe Haven Yacht Club Ltd ("Club"). The system comprises of a number of cameras located at the Club's entrances, the boatyard, the pontoon berths, the carpark and in and around the Club's buildings and other facilities. All cameras are controlled from the office and the system's live feed can only be accessed by nominated security guards, the Operations and Facilities Manager and the Marine Manager. The Club owns the CCTV system. This Policy will be subject to review by the General Committee on the recommendation of the Management. This Policy follows the Personal Data (Privacy) Ordinance guidelines.

## Objectives

The objectives of the Club's use of CCTV are:

**Safety and security** – through CCTV surveillance to help protect the Club's and Member's property and to improve safety in and around the Club's premises and pontoon berths for Members and members of the public whilst on Club Premises.

**Investigation of unlawful and criminal activity** - such as theft from boats and Club buildings and installations, vandalism and unlawful access to and trespassing upon Club premises and member's boats.

## Statement of intent

The CCTV Scheme follows the terms of the "Personal Data (Privacy) Ordinance (Cap. 486)" and "Guidance on CCTV Surveillance and Use of Drones" from Privacy Commissioner for Personal Data and complies with the requirements of the Ordinance and recommendations of the Privacy Commissioner's Guidelines. The Club will treat the system and all information, documents and recordings obtained and used as data protected by the Ordinance.

Cameras will be used to monitor activities within the Club's premises, to identify unlawful, criminal and other activity which may be adverse to the Club's and Member's interests.

Information obtained from CCTV surveillance will not be used for any commercial purpose. Images will not be shown to Members otherwise than for the purpose of enabling them to identify persons or activities on or around their own boats for the purpose of identifying persons or activities of concern. Otherwise images will only be released for use in the investigation of a specific crime and with the written authority of the police. Images will not be released to the media for purposes of news reporting or entertainment. Any use of security technologies for purposes other than the safety and security purposes contemplated by this policy is prohibited.

The planning and design of the CCTV installation has endeavored to ensure that the CCTV Scheme will give maximum effectiveness and efficiency within available means, but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

Warning signs have been placed at all access routes to areas covered by the Club's CCTV system.

This Policy will be subject to review by the General Committee on the recommendation of the Management. This Policy follows the “Personal Data (Privacy) Ordinance (Cap. 486)” guidelines. The Club may amend this policy at any time and Members will be informed of such changes by notice to the membership posted on the Club website.

## **Operation of the system**

The CCTV system will operate 24 hours a day, 7 days per week 365 days per year. The CCTV system will be administered and managed by the Club in accordance with the values and objectives expressed in the Club rules. The day to day operation and management of the CCTV system will be the responsibility of the Club's Management and nominated security guards.

## **Monitoring Procedures**

The Club owns the CCTV system and the General Manager (“GM”) and those managers delegated by the GM with the duty of monitoring the CCTV System shall have the right to access and utilize the CCTV system and images captured by it for the purposes of the Club.

Camera surveillance may be maintained at all times and footage continuously recorded. Footage will be held within the CCTV system's memory for up to 30 days. After 30 days the CCTV system will automatically delete footage unless the GM, the GM's delegate or the Police issue an order in writing to retain any given record.

Viewing of footage by any Member, the Police or any external individual must be recorded in writing and entered in the register.

Requests by the Police can only be authorized under section 19 of the “Personal Data (Privacy) Ordinance (Cap. 486)”. Images will only be released to the Police on the clear understanding that the stored material remains the property of the Club, and both it and images on it are to be treated in accordance with the terms in the Ordinance. The Club also retains the right to refuse permission for the Police to pass to any other person the CCTV records or any part of the images contained thereon. The Police may require the Club to retain any stored material for possible use as evidence in the future. Such stored material will be properly indexed and securely stored by the GM's delegate (normally the HR Manager) until the Police need them. Applications received from outside bodies (e.g. solicitors) to view or release stored footage will be referred to the Hon. Gen. Secretary. In these circumstances stored material will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, or in response to a Court Order. A fee may be charged in such circumstances.

## **Access Right**

The Data Protection Act provides Data Subjects (individuals to whom "personal data" relate) with a right to data held about them, including those obtained by CCTV. Requests for Data Subject Access should be made through the General Manager.

The GM shall have the right to authorize any member of the Club's staff whom he/she considers appropriate to view images stored on the CCTV system in the event any incident upon the Club's premises is reported to the GM. Members may be invited to view the footage on and around their own boats in the presence of an authorized manager.

In addition to the General Manager and the Marina Manager the H.R. & Accounting Manager and IT Manager are authorized to keep the log-in password for access to CCTV recordings.

## **System Control**

The IT department will periodically check and confirm the efficiency of the system and, in particular that the equipment is functioning properly. The Club will liaise with the supplier regarding servicing and/or repairs and maintenance of the system.

## **Breaches of the code**

The General Manager will initially investigate any breach of this policy by the Club's staff, outsourced Security Guards or Club Members.

## **Complaints**

Any complaints about the Club's CCTV system should be addressed to the General Manager.

## 引言

本政策旨在規範白沙灣遊艇會有限公司（「遊艇會」）對閉路電視系統（「CCTV」或「系統」）的管理、運作及使用。系統包括位於遊艇會入口、船塢、浮橋停泊處、停車場，以及遊艇會大樓和其他設施內部與周邊的多台攝影機。所有攝影機均由辦公室控制，只有指定的保安人員、營運及設施經理、海事經理可以存取系統實時影像傳送。CCTV 系統歸遊艇會所有。本政策將在管理層的建議下由執行委員會進行檢討。本政策遵循《個人資料(私隱)條例》的指引。

## 目標

遊艇會使用 CCTV 的目標包括：

安全和保障——透過 CCTV 監察協助保護遊艇會和會員的財產、提高會員和建築物公眾於遊艇會建築物內和浮橋停泊處的安全。

調查非法和犯罪活動——如船隻和遊艇會建築物和設施內的盜竊，故意破壞和非法進入並侵入遊艇會建築物及會員船隻。

## 意向聲明

CCTV 政策遵循《個人資料(私隱)條例》（第 486 章）和個人資料私隱專員公署頒佈的《閉路電視監察及使用航拍機指引》的條款，並遵守該條例的規定和私隱專員公署指引的建議。遊艇會將該系統及所獲得和使用的一切資料、文件和記錄視作受條例保護的數據。

攝影機將用於監察遊艇會建築物內的活動，識別可能有損遊艇會和會員利益的非法、犯罪和其他活動。

從 CCTV 監察獲取的資料不會用於任何商業目的。不會向會員放映影像，除非是為了幫助他們識別自己船上或周邊的人士或活動，以識別特定人士或活動。否則僅會在用於調查特定犯罪及在具有警方書面授權時提供影像。影像不會提供予媒體作新聞報道或娛樂之用。除本政策擬定的安全和保安目的外，禁止將 CCTV 影像用於其他目的。

CCTV 安裝的規劃和設計旨在確保 CCTV 計劃在現有資源中提供最大效用和效能，但無法保證系統能覆蓋或檢測到覆蓋範圍內發生的每一件事情。

在所有通往遊艇會 CCTV 系統覆蓋範圍的通道上均設有警告標誌。

本政策將在管理層的建議下由執行委員會進行檢討。本政策遵循《個人資料(私隱)條例》（第 486 章）的指引。遊艇會可以隨時修改本政策，並透過在遊艇會網站上張貼會員通知，告知會員該等變動。

## 系統運作

CCTV 系統每週 7 天、每天 24 小時運作，全年無休。遊艇會將根據遊艇會規則中所列的價值觀和目標經管及管理 CCTV 系統。CCTV 系統的日常運行和管理將由遊艇會管理層和指定保安人員負責。

## 監察程序

CCTV 系統歸遊艇會所有，總經理以及總經理指定負責監察 CCTV 系統的經理有權為了遊艇會存取和使用 CCTV 系統及其拍攝的影像。

攝錄監察系統可能會一直開啟並持續錄製視頻。視頻將在 CCTV 系統的儲存裝置中保存最多 30 天。除非總經理、總經理委派的代表或警方簽發書面命令，要求保留任何特定記錄，否則 CCTV 系統將在 30 天後自動刪除視頻。

任何會員、警方或任何外部個人觀看視頻均須以書面記錄並記入登記簿。

警方的要求只能根據《個人資料(私隱)條例》（第 486 章）第 19 條予以授權。只有在明確了解儲存材料仍屬遊艇會財產，並將根據該條例的條款處理材料及其中影像的前提下，才會向警方提供影像。遊艇會亦保留拒絕警方將 CCTV 記錄或其中所含影像的任何部分轉交任何其他人的權利。警方可能要求遊艇會保留任何儲存材料，以備日後作證據之用。該等儲存材料將由總經理派委的代表（通常為人力資源經理）適當編製索引及妥善儲存，直至警方需要使用為止。外部機構（例如律師）關於查看或提供儲存視頻的申請將交由榮譽秘書長處理。在該等情況下，如有令人信納的文件證據，證明儲存材料為法律程序所需或對法院命令的回應，通常會提供儲存材料。在該等情況下可能會收取費用。

## 存取權

《數據保護法》向資料當事人（即與「個人資料」有關的人士）賦予關於其資料的權利，包括 CCTV 獲得的資料。資料當事人的存取要求應透過總經理提出。

如總經理接獲有關在遊艇會建築物內發生事件的報告，他有權授權其認為合適的遊艇會工作人員查看儲存在 CCTV 系統中的影像。會員可能會被邀請在獲授權經理在場的情況下查看他們自己船上和周邊的視頻。

除總經理和海事部經理外，人力資源及會計經理和資訊科技經理亦有權保存存取 CCTV 錄像的登錄密碼。

## 系統控制

資訊科技部門將定期檢查並確認系統的效率，尤其是設備是否運作正常。遊艇會將就系統的檢修及／或維修保養聯絡供應商。

## 違反守則

總經理會調查遊艇會員工、外判保安人員或遊艇會會員違反本政策的情況。

## 投訴

任何關於 CCTV 閉路電視系統的投訴應提交總經理。

## Appendix I

### Locations of CCTV Cameras

1, 2, 3, 4, 5:	South pontoon
6, 7, 8, 9, 10:	North pontoon
11, 12:	Entrance of the pontoons
13, 14:	Boat Yard area
15, 16:	Footpath, Hard Standing & Boat lifting area
17:	Dinghy area, Marine office & Slipway
18:	Sampan pontoon
19, 20, 21, 22:	Car Park area
23, 24, 25:	Main vehicle entrance
26:	Steps down to the Sampan pontoon
27, 28, 29:	Garden Bar area
30, 31, 32:	Garden Bar inside
33:	Playground
34:	Female toilet & Disabled toilet
35:	Male toilet
36, 37:	Main office corridor
38, 39:	STC area
40, 41:	Balcony
42:	Cashier
43:	Inner Restaurant
44, 45:	Restaurant entrance
46:	Kitchen
47, 48:	Kitchen Store area
49, 50:	Main Entrance

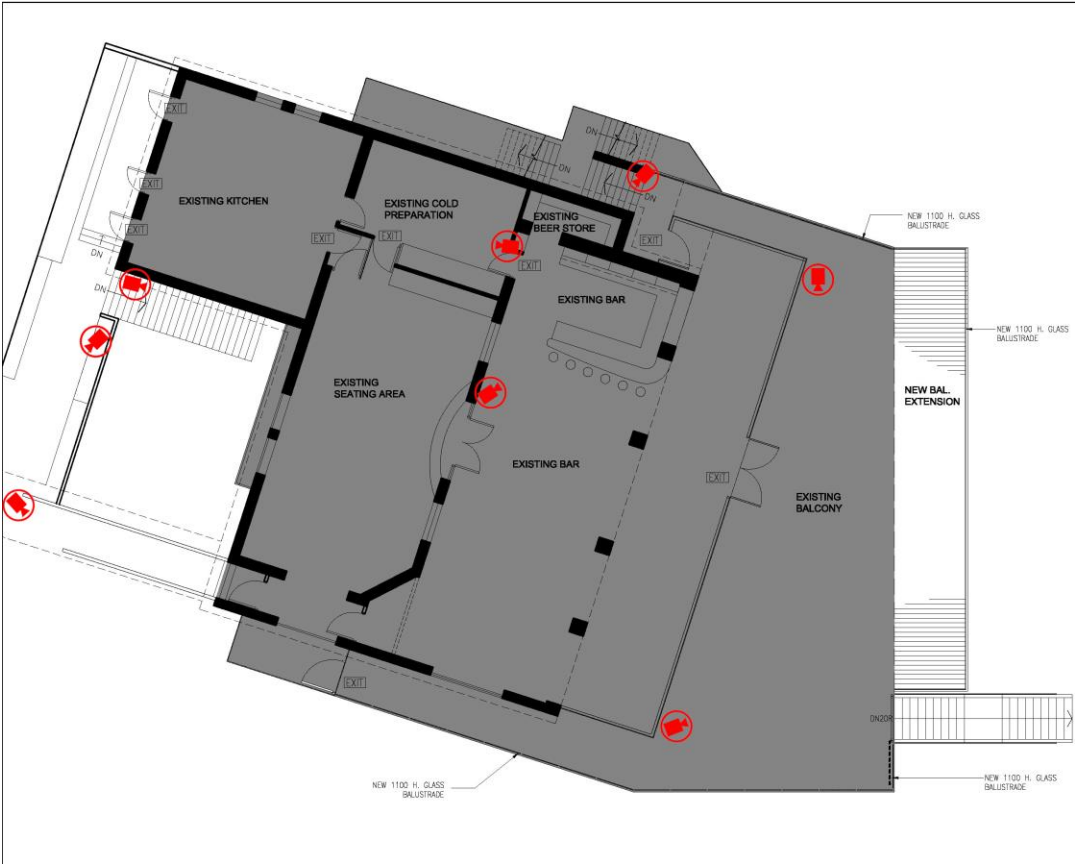
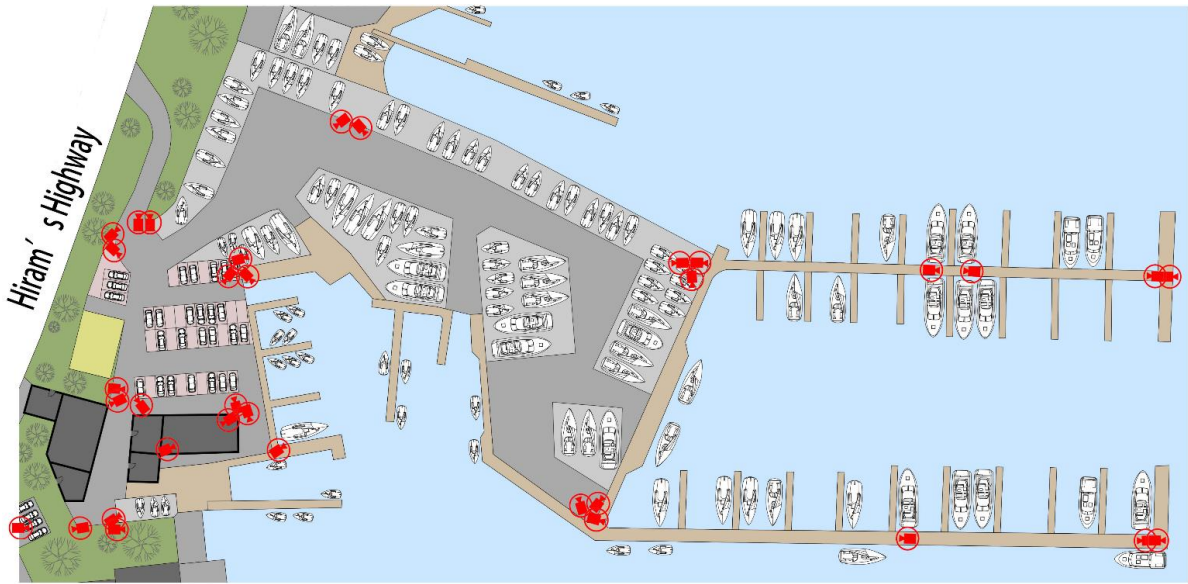
## 附錄一

### **CCTV 攝影機的位置:**

1、2、3、4、5：	南浮橋
6、7、8、9、10：	北浮橋
11、12：	浮橋入口
13、14：	船塢區
15、16：	行人路、硬地及小艇起吊區
17：	帆船區、海事部辦事處和滑道
18：	舢板浮橋
19、20、21、22：	停車場區域
23、24、25：	車輛入口
26：	前往舢板浮橋的台階
27、28、29：	花園酒吧區
30、31、32：	花園酒吧內部
33：	遊樂場
34：	女洗手間及殘障人士洗手間
35：	男洗手間
36、37：	主要辦公走廊
38、39：	<b>STC 區</b>
40、41：	露台
42：	收銀區
43：	餐廳內部
44、45：	餐廳入口
46：	廚房
47、48：	廚房儲物區
49、50：	主入口

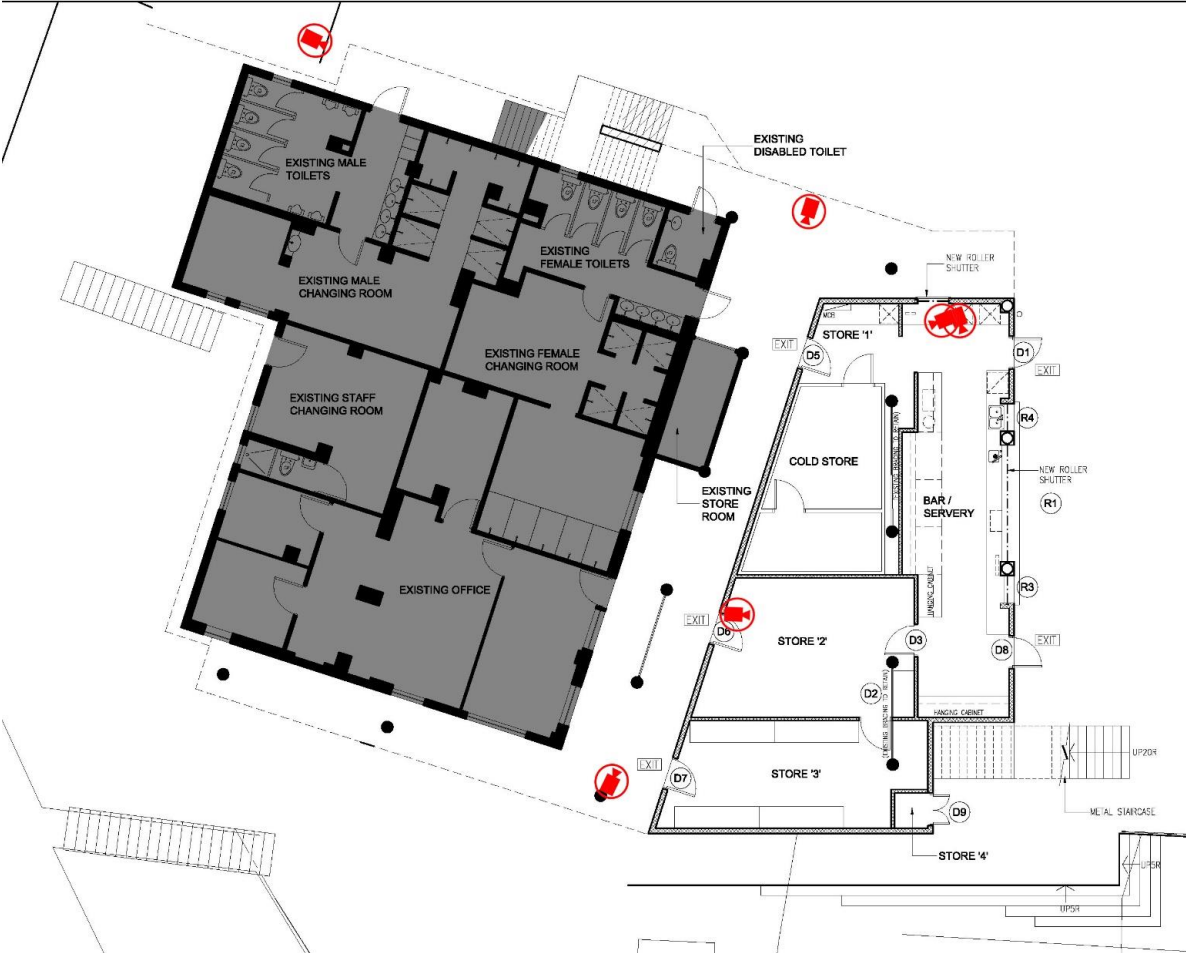
Locations of CCTV Cameras:

CCTV 攝影機的位置:



Locations of CCTV Cameras (cont'd):

CCTV 攝影機的位置 (續):



## Appendix II

### Web Links:

[Personal Data \(Privacy\) Ordinance \(Cap. 486\)](#)

[Guidance on CCTV Surveillance and Use of Drones](#)

## 附錄二

### 網頁連結：

[《個人資料\(私隱\)條例》（第 486 章）](#)

[《閉路電視監察及使用航拍機指引》](#)