

Public Note of the Privacy Impact Assessment for the Integration of a Camera Field Accessory into Thread X3

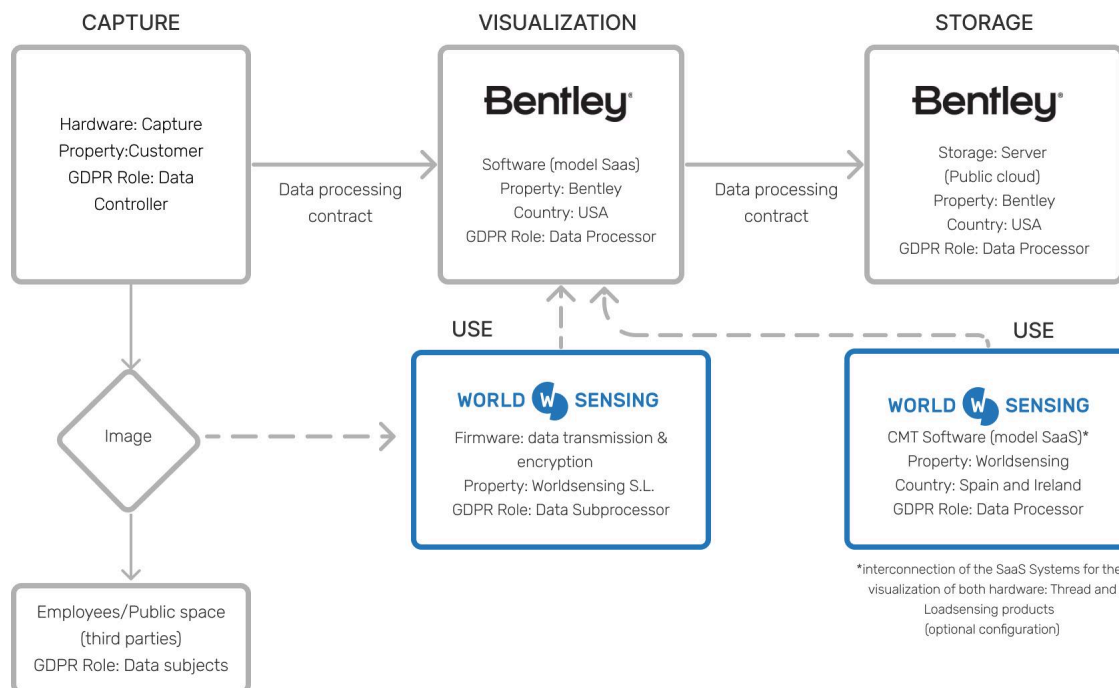
This document presents a summary of the Privacy Impact Assessment (PIA) conducted by Worldsensing concerning the integration of a Camera Field Accessory into Thread X3, focusing on data collection, processing, and sharing. The objective is to safeguard privacy rights while maximizing the benefits of using this technology. The complete PIA is maintained as a confidential document available for review by authorities if deemed necessary.

Keywords: [Camera Field](#) Accessory, [Thread X3](#)

Data Processing

The data processing for the integration of the Camera Field Accessory into Thread X3 focuses on image capture, contextual analysis, and storage, excluding facial or biometric recognition functionalities.

Data Flow



Lawful Basis

The lawful basis for data processing using the Camera Field Accessory varies depending on the legislation applicable in the country where it is utilized. Within the European Union, the legal bases are delineated by articles 6.1.b) and 6.1.f) of the General Data Protection Regulation (GDPR). Additionally, in certain cases, compliance with legal requirements (6.1.c) aimed at safeguarding infrastructures and mitigating potential risks may be necessary.

Anonymization of personal data

The absence of facial recognition or biometrics in handling images acquired with the Camera Field Accessory indicates that the surveillance technology is not intended for identifying specific individuals. Instead, it focuses on observing and recording events or situations in real time without directly linking them to identifiable persons, thus making the captured data non-intrusive.

Necessity of the PIA

An exhaustive analysis has been conducted regarding the obligation and necessity of performing a PIA. Considering the nature and extent of the data processing, it has been determined that a PIA is indispensable to ensure regulatory compliance and safeguard the rights and freedoms of the concerned parties.

Analysis of the necessity and proportionality of the Data Processing

The analysis of the necessity and proportionality of data processing using the Camera Field Accessory has demonstrated its necessity for commercial purposes and its exclusion of facial or biometric recognition. The processing is limited to monitoring abnormal events in private or public facilities.

Controls to mitigate potential risks

Adequate mitigation controls have been established to mitigate the risks associated with data processing using the Camera Field Accessory, including limiting the number of acquired images, protecting stored data, and the absence of facial recognition or biometrics technologies. The PIA has facilitated the identification and effective management of risks associated with the described data processing, ensuring compliance with regulations and safeguarding the rights of the concerned parties.

Controller's Identification and Main Obligations

The Controller, referred to herein as the Customer or User, responsible for deploying video surveillance and monitoring infrastructure shall assume responsibility for privacy principles in the field. The Controller is accountable for identifying, for its employees and the public, the areas subject to video surveillance and providing an appropriate level of information per Art. 13 of GDPR or applicable privacy law. The Controller must safeguard the privacy of employees, visitors, and third parties and refrain from placing cameras in areas designated for rest, bathrooms, and private life.

PIA Revision & Extension

The obligation to assess the necessity of additional Privacy Impact Assessments (PIAs) for each type of video surveillance topology rests with the Data Controller as a legal requirement. This includes cases where new technologies are implemented, such as the integration of artificial intelligence tools for object or situation recognition.

Conclusions

The Privacy Impact Assessment (PIA) for video surveillance using a Camera Field Accessory into Thread X3 has identified crucial factors for regulatory compliance and safeguarding individuals' rights. It showcases proactive data protection measures, with recommendations for enhancing security, implementing more robust privacy practices, and establishing enhanced data management in future releases of the Camera Field Accessory. The result of the PIA is positive, indicating that the product is aligned with GDPR principles if the recommendations outlined in the PIA are taken into account.

Revised and approved by the Data Protection Officer:
February 4th, 2024



Dr. Francisco Hernández-Ramírez