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The municipal board in Kungälv municipality

Diary number:

DI-2021-8567

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Date:

2023-05-15

Decision after supervision according to

camera surveillance act –

The municipal board in Kungälv

municipality

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The Swedish Privacy Protection Authority

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The Privacy Protection Authority's decision

The Privacy Protection Authority states that the Municipal Board in Kungälv Municipality

violates the permit requirement in Section 7 of the Camera Surveillance Act (2018:1200) by

the following locations during the specified time period conduct camera surveillance without permission.

- Nordmannatorget during the period 19 October 2021 to 15 May 2023
- The outdoor parking White spot during the period 8 June 2021 to 15 May 2023
- Bandy track Skarpe Nord during the period 11 September 2021 to 15 May 2023

- Kongahälla Center during the period 11 September 2021 to 15 May 2023
- Thorildskolan during the period 1 August 2018 to 15 May 2023
- The outdoor swimming pool in Kungälv during the period 1 August–7 November 2018, 13 May–1 September 2019, 10 June–29 August 2020, 21 May–4 September 2021 and 5 June–22 June 2022.

The Privacy Protection Authority issues a reprimand to the Municipal Board in Kungälv Municipality according to Section 24 of the Camera Surveillance Act and Article 58.2 b of the Data Protection Ordinance¹ for the violation.

The Privacy Protection Authority prohibits the Municipal Board in Kungälv municipality according to Section 24 of the Camera Surveillance Act and Article 58.2 f of the Data Protection Ordinance to conduct permit-required camera surveillance at Nordmannatorget, outdoor car park Vita the stain, the Skarpe Nord bandy court, Kongahälla Center, Thorildskolan and the outdoor swimming pool in Kungälv without a camera surveillance permit.

Statement of the matter

The Swedish Privacy Protection Agency (IMY) has received a complaint regarding camera surveillance in Kungälv municipality. The complaint states that the municipality conducts camera surveillance without permission in a number of places in the municipality where the public has access.

IMY has started supervision of the Municipal Board in Kungälv municipality (municipal board) i purpose of investigating the municipal board's camera surveillance of the public listed below places are subject to a permit in accordance with Section 7 of the Camera Surveillance Act, as well as - regarding the permit requirement

deemed to exist - whether the municipal board has permission for the camera surveillance.

The Camera Surveillance Act entered into force on 1 August 2018. IMY's supervision refers to the time period 1 August 2018 to the date of this decision.

What the municipal board has stated

The municipal board is responsible for nine different camera installations in the areas listed below

public places in Kungälv. The municipal board is responsible for personal data

the surveillance. In three of these places (places 1–3) surveillance takes place without

anonymization technology and in six places (places 4–9) the monitoring takes place with

anonymization technology. Surveillance takes place at the following locations.

1. The Three Kings car park. Surveillance takes place every day around the clock inside the parking garage.

1 Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with

regarding the processing of personal data and on the free flow of such data and on the cancellation of directive 95/46/EC (General Data Protection Regulation).

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2. The Palissaden parking garage. Surveillance takes place every day around the clock inside

3. Art Gallery Mimers Hus. Surveillance takes place every day around the clock

the parking garage.

the art exhibition hall.

4. Nordmann Square. The surveillance covers the square, connecting parking lot as well as

part of Kongahällagatan. The monitoring began on 19 October 2021 and is ongoing

every day at 18.00–06.00.

5. The "White spot" outdoor parking lot. The surveillance covers outdoor parking and

street parking. The monitoring began on June 8, 2021 and takes place every day

at 00:00–04:00.

6. Bandy track Skarpe Nord. The surveillance is partially fenced

sports facility. The monitoring began on 11 September 2021 and is ongoing

Monday–Friday at 23.30–07.00 and Saturdays and Sundays at 22.00–07.00.

7. Kongahälla Center. The surveillance concerns the outside of the shopping centre. The surveillance started on 11 September 2021 and takes place every day at 18.00–06.00.

8. Thorild School. The surveillance concerns the school yard and outdoor facades.

The monitoring began on 28 August 2017 and takes place every day around the clock.

9. The outdoor swimming pool in Kungälv. The surveillance refers to the outdoor pool and adjacent areas surfaces. Surveillance takes place every day at 21.40–06.30 during that period of the year

there is activity in the bath. Monitoring has taken place during the following

time periods: July 7–August 18, 2015, May 9–October 20, 2016, May 17–20

September 2017, June 21–November 7, 2018, May 13–September 1, 2019,

10 June–29 August 2020, 21 May–4 September 2021 and 5 June–22 June 2022.

Security in the parking garage and art gallery (places 1–3)

With regard to the surveillance at locations 1–3, the municipal board has essentially stated

following. The monitoring takes place without an anonymization function. Because the coverage in

the Tre Kungar car park and the Palissaden car park are done with the aim of preventing,

preventing or detecting criminal activity or investigating or prosecuting crime is not required

permission. Regarding the security in the Art Gallery Mimers Hus, Kungälv municipality has one

valid permit for camera surveillance from the County Administrative Board².

Surveillance with anonymization technology (places 4–9)

With regard to the surveillance at locations 4–9, the municipal board has stated that the surveillance

takes place with anonymization technology. The current technology – anonymization through

pixelation – in short means that foreground objects such as pedestrians, vehicles and

similar is replaced with a low-resolution version of the same object. The thought with

the monitoring is that it should be possible to see about people from anonymized video material

stays in a certain place for a certain time, and automatically notify

the alarm operator in unwanted situations. The alarm operator only takes part anonymized image material. The monitoring is provided by the alarm operator who handles video alarms information about the course of events in a certain situation so that he can decide whether guards need to be sent to the site. Anonymized material is saved and stored in triplicate days. The original video is not recorded.

Technical description of "anonymization by pixelation"

The technique replaces foreground objects with a number of larger pixels (square picture elements) in a way that makes identification of the person in question impossible. If the original video is in color the color information of the foreground objects is eliminated and replaced by a grayscale version of the same object. The coarseness of the pixelation can be set per camera. The

2 Decision of the County Board of Västra Götaland County on 26 February 2007 in case 211-2587-2007.

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the current cameras are set so that people's faces are covered by a maximum of 5x5 pixels which is the default setting.

All surveillance in places 4–9 takes place with the pixelation function switched on. The cameras collect upload footage from the scene, called "original video". The low-resolution image is superimposed on i a software that runs on a server with direct connection to the camera in a private network. Before the low-resolution image is superimposed, the video data is handled only in the camera's RAM, network buffers and the like, and only for a fraction of a second.

No original video is saved on hard drive, in database or other more permanent storage location. Compared to other technologies, it is not about taking pictures with identifiable people are first saved and then anonymized - without the whole process with image recording and anonymization happening simultaneously and at the same time.

The software is a prerequisite for the camera to function as intended. It is not possible to record footage through the camera without processing the original video takes place via the software. The entire process takes between 0.02 to 0.1 seconds. First after this process, the image capture is accessible to humans. There is no technical possibility for an individual to access imaging that occurs before the process is completed. There is no way to recreate the original video from the anonymized one the video.

The municipal board's assessment regarding the identification of individuals

The technique of anonymization through pixelation includes a variety of techniques to make identification of individuals impossible. These include reducing resolution to one level so low that identification becomes impossible, removal of color data to make large objects and articles of clothing impossible to recognize, "introduced imprecision" in the image that does precise measurements of object dimensions impossible. Individuals therefore cannot be identified based on video material where anonymization through pixelation has been applied, neither manually nor with technical methods. In this part, the municipal board has, among other things, referred to the industry standard for video surveillance systems³ regarding which image resolution required to perform a certain surveillance task, e.g. identification or recognition possible.

The municipal board's assessment regarding the permit obligation

Camera surveillance that takes place with the anonymization function turned on does not constitute personal data processing according to the data protection regulation and neither personal surveillance in the meaning of the Camera Surveillance Act when individuals who meet the criteria of the surveillance cannot be identified. The Data Protection Regulation and the camera surveillance act is therefore not applicable regarding the surveillance that takes place in place 4–9.

In this part, the Municipal Board has referred to a supervisory decision from the County Board i

Västra Götaland county⁴ which, according to the municipal board and the alarm operator, constitutes precedent that monitoring with the anonymization technology does not constitute personal monitoring in the meaning of the Camera Surveillance Act. The municipal board states that the county board's supervisory decisions apply to the same basic technology and settings for the anonymization function which is used for the surveillance in places 4–9.

Before the decision to set up cameras in public places contacted the municipality's security coordinator IMY (then the Data Inspectorate) for advice regarding the permit obligation. The advice and authority information that IMY

3 International Electrotechnical Commission, Industry Standard for Video Surveillance Systems - IEC 62676-4:2016

4 Decision of the County Board of Västra Götaland County on 19 December 2012 in case 211-41360-2012.

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provided in its response gives the impression that IMY has made an assessment of the image material the security coordinator attached to the email. The municipal board has rightly understood IMY's answer that the attached image material did not constitute personal surveillance and that camera surveillance was therefore not subject to a permit. The municipal board also refers to information from the alarm operator that the current anonymization technology has been demonstrated for and approved by IMY as not requiring a permit.

Justification of the decision

Applicable regulations

Article 4.1 of the data protection regulation states that any information relating to a identified or identifiable natural person is personal data. According to Article 4.2 i the data protection regulation refers to processing a measure or combination of measures regarding personal data, for example collection, registration, storage,

reading and erasing.

According to Article 4.7 of the data protection regulation, the person in charge of personal data means a natural or legal person, public authority, institution or other body which alone or together with others determines the ends and the means for the processing of personal data.

In the Camera Surveillance Act, there are provisions on camera surveillance that supplement data protection regulation. The purpose of the Camera Surveillance Act is to meet the need for camera surveillance for legitimate purposes and to protect natural persons against undue intrusion into personal privacy during such monitoring (section 2 the Camera Surveillance Act).

The concept of camera surveillance is defined in Section 3 of the Camera Surveillance Act. Of 3 § 1 it appears that camera surveillance is meant

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that a television camera, another optical-electronic instrument or a thereby comparable equipment is used,
that the equipment is used without being operated on site,
that the equipment is used in a way that implies permanent or regular use repeated personal surveillance.

Personal surveillance means that people can be identified through the surveillance. The it is required that such characteristics can be observed which means that one can without great uncertainty distinguish the persons being observed from other persons. This is the case if the whole person or the person's face is clearly visible. Also such as distinctive clothing, special body movements or particular body constitution can enable identification (prop. 2017/18:231 pp. 41 and 137). Pictures from the so-called thermal imaging cameras can be so clear through

that particular characteristics appear that it may be a question of personal surveillance.⁵

Even surveillance with a still camera can constitute personal surveillance even though body movements then cannot be observed (cf. the Court of Appeal in Stockholm's judgment on November 7, 2007 in case no. 6613-07).

Long-term personal surveillance refers to e.g. surveillance with a camera as under one longer time is located in or directed towards a place where people normally stay. With regularly repeated bodyguarding means bodyguarding on several occasions.

5 SOU 2009:87 p. 162

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The requirement for regularity is that it should primarily be about occasions that are relatively close to each other in time. Also surveillance on occasions that are more scattered however, can be considered regular if it is a matter of systematic use of surveillance equipment (prop. 2017/18:231 p. 137).

According to Section 7 of the Camera Surveillance Act, permission is required for camera surveillance of a location the public has access, if the monitoring is to be carried out by an authority, or someone other than an authority when carrying out a task of public interest that follows from law or other constitution, collective agreement or decision issued on the basis of law or other constitution.

According to Section 8, third paragraph, 2 of the Camera Surveillance Act, when assessing it the individual's interest in not being monitored is particularly taken into account if technology promotes the protection of the individual's personal integrity must be used.

According to Section 9 8 of the Camera Surveillance Act, permission is not required for camera surveillance at guarding in a parking garage, if the purpose of the guarding is to prevent, prevent

or detect criminal activity or investigate or prosecute crime.

Personal data responsibility

The municipal board has stated that it is responsible for the processing of personal data personal data that takes place through camera surveillance at locations 1–9 in Kungälv. What the municipal board states that it is supported by the investigation in the case. IMY therefore assesses that The municipal board is responsible for personal data for the current processing.

Security in the parking garage and art gallery (places 1–3)

The security in the art gallery Mimers Hus, the parking garage Tre Kungar and The Palissaden car park takes place without anonymisation technology. It appears from the investigation that the surveillance constitutes the kind of camera surveillance referred to in Section 3 of the Camera Surveillance Act. IMY further states that because the municipal board is an authority and the monitoring takes place in places where the public has access is required which main rule permission according to section 7 of the Camera Surveillance Act.

The security in the Tre Kungar car park and the Palissaden car park (place 1 and 2) occurs inside the parking garages and for the purposes of prevention, prevention or detection criminal activity or investigating or prosecuting crime. Such monitoring is according to 9 § 8 the camera surveillance act exempted from the permit requirement. The surveillance at location 1 and 2 is thus not subject to a permit.

As for the security in the art gallery Mimers Hus (location 3) Kungälv municipality has granted permission for camera surveillance according to older legislation.⁶ IMY notes that the permit according to the transitional provisions to the camera surveillance act still applies. The municipal board therefore has permission for the surveillance at location 3.

Against this background, IMY notes that the municipal board's camera surveillance on locations 1–3 either have a permit or are exempt from the permit requirement. It is therefore missing reason to investigate the camera surveillance of these places further.

⁶ Decision of the County Board of Västra Götaland County on 26 February 2007 in case 211-2587-2007.

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Monitoring with anonymization technology (places 4–9)

The Camera Surveillance Act applies to the surveillance

IMY states that it appears from the investigation that the camera surveillance of the locations 4–9 takes place with equipment that falls under the concept of television camera, other optical instrument or comparable equipment according to § 3 § 1 of the Camera Surveillance Act. The it also appears that the camera equipment is permanently mounted at the relevant locations.

The monitoring takes place automatically and the equipment is therefore not operated on the place.

Decisive for the question of whether the municipal board's use of cameras constitutes camera surveillance in the sense of the law is therefore if the cameras are used in a way that means permanent or regularly repeated personal surveillance. With personal security means that people can be identified based on the surveillance.⁷

The municipal board has stated that the purpose of the surveillance is not to identify individual persons, but only to see if someone stays in a certain place and notify the alarm operator in the event of unwanted situations. IMY states that the purpose of the use of the camera equipment is irrelevant to the question of the applicability of the Camera Surveillance Act. ⁸ The Act is applicable both in the case of such use of cameras that take place for the purpose of monitoring people and such use that takes place for other purposes but where people at the same time for a longer period of time or reasonably regularly enter the camera's field of view in a way that makes them possible to identify. What the municipal board stated about the purpose of the surveillance is missing therefore important for the assessment.

With regard to the use of the camera equipment, it appears from the investigation that it takes place first by recording the image data (the original video) and then by transferring the original video to a server. A software processing takes place on the server which results in a processed image material (pixelated images). The pixelated images are then stored in triplicate days.

The municipal board believes that the assessment of whether the use of cameras involves personal surveillance must be done based on the pixelated images and not from the outside the original video. IMY notes, however, that already the recording of the original video, the transmission of the original video to the server and the processing of the original video constitute use of such equipment covered by the Camera Surveillance Act. The it appears from the investigation that the original video is of such quality that it is possible to identify individuals. That access to the original video is prevented by technical measures do increase privacy protection but do not result in the processing ending to constitute personal data processing or personal surveillance. The treatment of the original video is thus both personal data processing according to data protection regulation as personal surveillance in the meaning of the Camera Surveillance Act. Because personal security refers to places where individuals normally stay and regularly comes within the coverage area of the cameras, the surveillance is permanent and regularly repeated.⁹ The municipal board's camera use through recording of the original video, transmission to the server and processing of the video on the server constitute thus camera surveillance in the sense referred to in Section 3 of the Camera Surveillance Act.

⁷ Prop. 2017/18:231 pp. 41 and 137.

⁸ Prop. 2017/18:231 p. 137.

⁹ Cf. prop. 2017/18:231 p. 137.

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When it comes to the assessment of whether also the treatment of the pixelated the images constitute personal surveillance, IMY states that the current software technology admittedly making identification difficult. The images have, after the pixelation, a low resolution which reduces the possibilities of distinguishing a person's facial features. Furthermore, have color information on people in image eliminated. However, it is not a question of a complete one masking where only outlines can be discerned without people in the image being presented in a gray scale. Several factors are important when assessing whether an identification can happen and a person can be identifiable based on one or more characteristics. The the pixelated images can still provide information about e.g. what type of clothing the person carries or if they use aids such as a wheelchair, crutches or walkers.

The investigation shows that with the cameras you can observe at least these types of distinctive clothing, particular body movements or particular body constitution that do that one can distinguish the people being observed from other people without much uncertainty.

IMY emphasizes in particular that the surveillance at Thorildskolan refers to a limited one circle of students and staff, which can facilitate identification. It can further found that the pixelated images are saved for three days, which means larger opportunities for identification of individuals compared to if surveillance had only taken place in real time. Overall, IMY judges that the camera images, despite the use of it described software, are clear enough that individuals passing the cameras can be identified. It is therefore the question of personal security.

Even if not all people who are met by the surveillance will be able to is identified, IMY assesses that identification can take place regularly. Then that's the question systematic use of camera equipment in places where many people stay

IMY assesses that the personal surveillance is lasting and regularly repeated. Against

IMY considers that the pixelated image material also constitutes this background

camera surveillance in the sense referred to in Section 3 of the Camera Surveillance Act.

The Camera Surveillance Act is therefore also applicable with regard to the processing of pixelated imagery.

In summary, IMY assesses that both the recording and processing of the original video to which the pixelated images are processed the camera surveillance law.

The technology that the municipal board uses in locations 4–9 does not therefore mean that the surveillance falls outside the scope of the camera surveillance act.

However, the use of the technology means that the privacy risks with personal data processing and camera surveillance are reduced. It is thus question about such privacy-promoting technology as, according to § 8 third paragraph 2 the camera surveillance act, especially must be taken into account during a permit review. 10

The municipal board lacks permission for camera surveillance

The municipal board has stated that in light of the county board's decision¹¹, information from IMY as well as data from the alarm operator had reason to perceive that the camera surveillance act is not applicable when surveillance takes place with the person in question the anonymization technique.

Whether a certain camera use means camera surveillance requiring a permit or not, is decided by the IMY after an examination in an individual case. Neither IMY nor the county board¹²

10 Prop. 2017/18:231 p. 145

11 Decision of the County Board of Västra Götaland County on 19 December 2012 in case 211-41360-2012.

12 The County Administrative Board was, according to the Camera Surveillance Act (2013:2013:460), the authority responsible for examining applications for and issue permits for camera surveillance. The task was taken over by IMY on 1 August 2018 through the new the camera surveillance law.

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has tested the use of cameras in locations 4–9 through a permit procedure or through supervision reviewed camera use. IMY notes that the municipality's security coordinators have turned to IMY's information service and received general information regarding the concept of personal surveillance in Section 3 of the Camera Surveillance Act. 13 That information has not been able to be used as revenue because the surveillance is not covered permit obligation.

The municipal board is an authority and therefore needs permission to operate camera surveillance in places where the public has access. IMY notes that the public has access to places 4–9. The municipal board's camera surveillance on site 4–9 is therefore subject to a permit according to Section 7 of the Camera Surveillance Act. The municipal board does not hold a valid permit for camera surveillance in the areas in question the places. The municipal board has not applied for a permit either.

IMY thus states that the municipal board violates the permit requirement in § 7 the camera surveillance law by in the following places during the specified time period conduct camera surveillance without permission.

- Nordmannatorget during the period 19 October 2021 to 15 May 2023
- The outdoor parking White spot during the period 8 June 2021 to 15 May 2023
- Bandy track Skarpe Nord during the period 11 September 2021 to 15 May 2023
- Kongahälla Center during the period 11 September 2021 to 15 May 2023
- Thorildskolan during the period 1 August 2018 to 15 May 2023
- The outdoor swimming pool in Kungälv during the period 1 August–7 November 2018, 13 May–1 September 2019, 10 June–29 August 2020, 21 May–4 September 2021 and

5 June–22 June 2022.

Choice of intervention

Applicable regulations

According to section 24 of the Camera Surveillance Act, provisions on the supervisory authority's powers in the data protection regulation also apply to the supervision of the camera surveillance law is followed.

According to § 25 § 1, the supervisory authority may collect a sanction fee from the operator camera surveillance and violates the permit requirement in section 7.

When deciding on a penalty fee, according to Section 26 of the Camera Surveillance Act, Article 83.1, 83.2 and 83.3 of the data protection regulation and ch. 6 Sections 4–7 of the Data Protection Act¹⁴ apply.

Section 27 of the Camera Surveillance Act states that in the event of such violations as referred to in Section 25 1–3, the size of the fee shall be determined in application of Article 83.4 i the data protection regulation or, in the case of authorities, with application of the lower one the fee level in ch. 6 Section 2, second paragraph of the Data Protection Act.

From article 58.2 and article 83.2 of the data protection regulation it appears that IMY has power to impose administrative penalty charges in accordance with Article 83.

Depending on the circumstances of the individual case, administrative penalty fees are imposed in addition to or instead of the other measures referred to in article 13 IMY Inquiry Case DI-2020-11701.

¹⁴ Act (2018:218) with supplementary provisions to the EU's data protection regulation

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58.2, such as injunctions and prohibitions. Furthermore, it is clear from article 83.2 which

factors to be taken into account when deciding whether administrative penalty charges are to be imposed and when determining the size of the fee. If it is a minor violation receives IMY as set out in recital 148 in lieu of imposing a penalty charge issue a reprimand according to article 58.2 b. Consideration must be given to aggravating circumstances and mitigating circumstances of the case, such as the nature of the violation, degree of severity and duration as well as previous violations of relevance.

IMY's assessment

IMY has established that the municipal board by conducting camera surveillance on location 4–9 violates the permit requirement in Section 7 of the Camera Surveillance Act. A violation of that provision may result in a penalty charge.

The camera surveillance is carried out in places where the public has access and includes a large number of people from an indefinite circle and involves an intrusion into their personal integrity. The surveillance has been going on for a long time. In the supervisory matter has not emerged other than that camera surveillance is still ongoing at all locations including exception for the outdoor swimming pool (place 9).

It is a matter of surveillance in different types of places where the interest in privacy arises different strongly applicable. The breach of privacy during night time camera surveillance on parking spaces are generally considered to be limited, as few people are met by the surveillance. In the case of schools and schoolyards, this means camera surveillance, on the other hand often a significant invasion of privacy. According to the data protection regulation, children are a group worthy of special protection. A school yard is a place for recreation where children and young people stays both during and after school hours. The school is also a workplace where students and teachers must be present. Camera surveillance during business hours is therefore particularly sensitive. Against this background, IMY considers it difficult to

The municipal board has for several years carried out round-the-clock camera surveillance at Thorildskolan without permission.

However, IMY assesses that the image processing software – anonymization through pixelation – which the municipal board makes use of means that the breach of privacy decreases, compared to if during the entire process there had been a question of treatment and storage of high-resolution images. That the municipal board uses integrity promotion technology is a mitigating factor.

IMY assesses that the violation of Section 7 of the Camera Surveillance Act found in this decision is of such scope and degree of seriousness that it would normally incur a penalty charge.

In this supervisory case, however, there are special circumstances that speak against one penalty fee. The municipal board has referred to a supervisory decision from the County Board i Västra Götaland County¹⁵, which was then the competent supervisory authority, as support for that monitoring with the anonymization technology does not constitute personal monitoring i the meaning of the Camera Surveillance Act. The municipal board states that the county board's supervisory decisions apply to the same basic technology and settings for the anonymization function which is used for the surveillance in places 4–9. IMY notes that the county board's decision has given the municipal board some justification for the view that the camera surveillance was not license required. This has meant that there has been a lack of clarity about how the regulation is would be interpreted.

¹⁵ Decision of the County Board of Västra Götaland County on 19 December 2012 in case 211-41360-2012.

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From the preparatory work for the camera surveillance law, it appears that there may be cases where it is unclear how the camera surveillance law should be interpreted. In such cases, whoever has made one should incorrect interpretation of the regulation is first given the opportunity to come to terms with

the violation through, for example, an injunction or a warning from the supervisory authority. Only if such a warning or order is not followed should penalty fees come into question.¹⁶ IMY notes that it is a matter of application of a provision on penalty fees introduced in national law (section 26 of the Camera Surveillance Act) and that the operating statements are therefore indicative of the interpretation of the provision.

IMY finds in an overall assessment of the circumstances that, especially with consideration of what was stated in the preparatory work for the camera surveillance act, is available reason to refrain from imposing a penalty fee on the municipal board found the violation. The municipal board must therefore, with the support of § 24 of the Camera Surveillance Act and Article 58.2 b of the Data Protection Ordinance, instead one is given reprimand for the established violation.

The camera surveillance means a breach of privacy for people who are seen by it the surveillance and it is urgent that the camera surveillance ceases. IMY assesses because there is reason to prohibit the municipal board according to article 58.2 f i of the data protection regulation and section 24 of the camera surveillance act to operate subject to a permit camera surveillance at Nordmann Square, the outdoor car park Vita fläkken, the Skarpe Nord bandy track, Kongahälla Center, Thorildskolan and the Outdoor Swimming Pool i Kungälv without a camera surveillance permit.

This decision has been taken by the general manager Lena Lindgren Schelin after a presentation by lawyer Moa Nordqvist. In the final proceedings, the Chief Justice David also has Törngren and the IT security specialist Petter Flink participated.

Lena Lindgren Schelin, 2023-05-15 (This is an electronic signature)

Copy to:

Data Protection Officer (for information)

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How to appeal

If you want to appeal the decision, you must write to the Swedish Privacy Agency. Enter in the letter which decision you are appealing and the change you are requesting. The appeal shall have been submitted to the Privacy Protection Authority no later than three weeks from the date of the decision was announced. If the appeal has been received in time send

The Privacy Protection Authority forwards it to the Administrative Court in Stockholm examination.

You can e-mail the appeal to the Privacy Protection Authority if it does not contain any privacy-sensitive personal data or information that may be covered by secrecy. The authority's contact details appear on the first page of the decision.